



JYOTI BROKING PVT. LTD.

Previously Known as "JYOTI PORTFOLIO PVT. LTD" CIN : U74899HR1980PTC036599

MEMBERS : NATIONAL STOCK EXCHANGE, BOMBAY STOCK EXCHANGE, DEPOSITORY PARTICIPANT : NSDL & CDSL

Corp. Office : B-78, 3rd Floor, Defence Colony, New Delhi - 110024

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RISK MANAGEMENT POLICY

Pay-in or margin cheques are either collected by our field staff or clients send them through couriers or they do fund transfers through NEFT/RTGS/ELECTRONIC FUND TRANSFER from their respective account. Margins in F&O are collected upfront as per positions to be carried over and pay-in cheques / NEFT/RTGS/ELECTRONIC FUND TRANSFER are deposited in the bank latest by pay-in day. Setting up of limits is being done through the XTS admin or through corporate and Branch Manager ID's for exposures & turnover for clients, terminals, branches.

We monitor debit balances of the clients on daily basis

We send quarterly financial & demat ledgers to the clients

For debits we ensure that we do not allow them to take further exposures after T+15 debit balances and regularly try to convince them to clear their debit balances.

Yes we charge penal interest for outstanding debts.

The securities purchased by the client in CM Segment and or F&O segment (under physical settlement) shall be settled as under:

- i) The securities purchased by the client in CM Segment and or F&O segment (under physical settlement) for which the payment is made/credit balance is available, in full on or before pay in day shall be transferred to beneficiary demat a/c of the client from Pool a/c within 24 hours of pay out.
- ii) The securities purchased by the client in CM Segment and/or F&O segment (under physical settlement) for which the full credit balance is not available in the account of the client or the payment is not/partially made by the client, shall be transferred to Client Unpaid Securities Account (CUSA)
- iii) The securities lying in the CUSA shall be transferred to the beneficiary demat account of the client only on the receipt/availability of full amount from the client
- iv) The securities lying in the CUSA shall be liquidated to the extent of debit balance within 5 trading days from the pay-out date of such securities without further notice to the client and the securities so liquidated shall be transferred to Pool Account for meeting payin obligation. No securities shall be kept in CUSA for more than 5 trading days from the pay-out date of such securities.
- v) The choice of selection of securities to be liquidated against debit balance from CUSA will be at the sole discretion of the Member Broker depending upon the liquidity of the scrip, volatility in the market or any other factor as the Member Broker deem fit in each case.
- vi) With effect from 1st April 2023, payout of all unpaid securities shall be transferred to respective client's demat account followed by creation of auto pledge with the reason 'Unpaid' in favour of account titled 'Client Unpaid Securities Pledgee Account' (CUSPA)
- vii) If the client fulfils its fund obligation within 5 working/trading days after payout, FM shall release the pledge so as the securities are available to client as free balance else the trading member shall dispose off such unpaid securities in the market within 5 trading days after payout.

viii) In case such pledge is neither invoked nor released within 7 working days after payout, the pledge on securities shall be automatically released and the securities shall be available to client as free balance.

Mechanism of pay-in and pay-out of funds and securities:

For Funds:

In case of payin, we make the funds available in the settlement account out of the funds that are already available with us, from the respective client whose payin is being done in that settlement and the amount which is short from clients or which belong to us (pro account) is made available from our own funds.

Payout is received in settlement account and the money which belongs to the clients is kept in the client account.

Payin/Payout of securities:

In case of payin of securities which are sold by the client and are already lying with us in our CUSA A/c, MTF A/cs are transferred to the pool account and the rest are transferred by the clients themselves from their beneficiary account to our pool account. And in case of payin of securities of our pro account and where ever we have POA/DDPI from clients we transfer shares from client's account to pool account, securities are transferred from our own beneficiary account to pool account. In case of payout received from clearing corporation, payout is transferred to respective client's beneficiary account, For the payout belonging to pro account, it is transferred to our own beneficiary account.

However, since January 2023, feature of block mechanism is being adopted wherein then the client intends to make a sale transaction shares will be blocked in the demat account of clients in favour of Clearing Corporation. If the sale transaction is not executed, shares will continue to remain in client's demat account and will be unblocked at the end of T day.

Payments are always done by NEFT/RTGS/Transfers etc. only electronically.

Every time we clearly tell the client his debit balance, margin amount, value of securities pledged with us and most of the clients after understanding their positions give instructions to square up positions as per their desire and our fund requirements. May be in some isolate cases if we had done any square ups by our own that is only done after sending proper written communication either through email or courier. Till now all squared up transactions have been done after informing clients about the shortfall and on their instructions only.

We also mark those transactions in contract notes which are squared up by us.

We daily inform the clients at day end about fund/securities/margin requirements Through Email.

Whenever we feel that client is trying to avoid the situation we maintain proper Records for the margin calls made

For delivery clients we mostly take payments on NIL basis only which is auto balance confirmation and for high volume clients we insist clients to send mail confirmations of ledger entries and balances periodically in reply to our emails of ledger.

Framework for Trading Members to provide the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities
(per requirements of SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024)

The framework for Jyoti Broking Pvt. Ltd. for providing the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities as finalised by the Brokers' Industry Standards Forum in consultation with the Exchanges is as follows:

1. Jyoti Broking Pvt. Ltd is providing internet based trading/ mobile trading/ other online access for trading, shall allow clients to communicate through the following modes to request for voluntary freezing/ blocking the online access of trading account if any suspicious activity is observed in the trading account: -
 - a) Email from registered e-mail ID
 - b) Call/SMS from registered mobile number
 - c) Trading Member's website
2. Dedicated Email id and Contact number for receipt of communication for voluntary freezing/ blocking of the online access of the clients' trading account is

Email: stoptrade@jyotiportfolio.com

Contact no. 01146059446,01146059432, 9810159032,9667501765

3. Jyoti Broking Pvt. Ltd shall take the following actions on the receipt of request through any modes of communications as provided by the Jyoti Broking Pvt. Ltd for freezing/blocking of the online access of the trading account from the client:
 - a. Validate that the request is received from the client as per below point no. 4 and issue the acknowledgement as well as freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the said client. The timelines for freezing/ blocking of the online access of the clients' trading account is as under: -

Scenario	Timelines for issuing acknowledgement as well as freezing / blocking of the online access of the trading account.
Request received during the trading hours ¹ and within 15 minutes before the start of trading.	Within 15 minutes ²
Request received after the trading hours and 15 minutes before the start of trading.	Before the start of next trading session

¹Trading hours shall be as follows:

Capital Market Segment: 9.15 a.m. to 3.30 p.m., Equity Derivatives Segment: 9.15 a.m. to 3.30 p.m., Currency Derivatives Segment: 09.00 a.m. to 05.00 p.m., Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.

² To begin with, the time limit of 15 minutes is being specified for the purpose of issuing acknowledgement as well as freezing/blocking of the online access of the trading account. This time limit shall be contracted after a review in next six months after the date of its applicability to enhance protection of investors from suspicious activities.

- b. Post freezing/blocking the client's trading account, Jyoti Broking Pvt. Ltd shall send a communication on the registered mobile number and registered e-mail ID of the client, stating that the online access to the trading account has been frozen/blocked and all the pending orders in the client's trading account, if any, have been cancelled along with the process of re-enablement for getting the online access to the trading account.
 - c. Details of open positions (if any) should also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account. This will eliminate the risk of unwanted delivery settlement. This time limit shall be contracted after a review in the next six months after the date of its applicability to enhance protection of investors from suspicious activities.
4. Jyoti Broking Pvt. Ltd shall validate that the request for freezing/blocking of the online access of the trading account is received from the respective client only. This shall be done by the Jyoti Broking Pvt. Ltd by:
 - a) verifying whether request is received from the registered phone number/e-mail Id of the client;
 - b) Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time.
 5. Jyoti Broking Pvt. Ltd shall maintain the appropriate records/logs including, but not limited to, request received to freeze/block the online access of trading account, confirmation given for freezing/blocking of the online access of the trading account and cancellation of pending orders, if any, sent to the clients.
 6. In case of failure of the Jyoti Broking Pvt. Ltd in freezing/ blocking the online access within the prescribed timelines
(15 minutes in case the request is received during the trading hours and within 15 minutes before the start of trading / Before the start of the next trading session in case the request is received after the trading hours and 15 minutes before the start of the trading), Jyoti Broking Pvt. Ltd shall be responsible for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.
 7. Re – enabling the client for online access of the trading account: - Jyoti Broking Pvt. Ltd shall re-enable the online access of trading account after carrying out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account.
 8. It is clarified that:
 - a. Freezing/blocking is only for the online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of the Trading Member.
 - b. The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.

Procedure for the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities

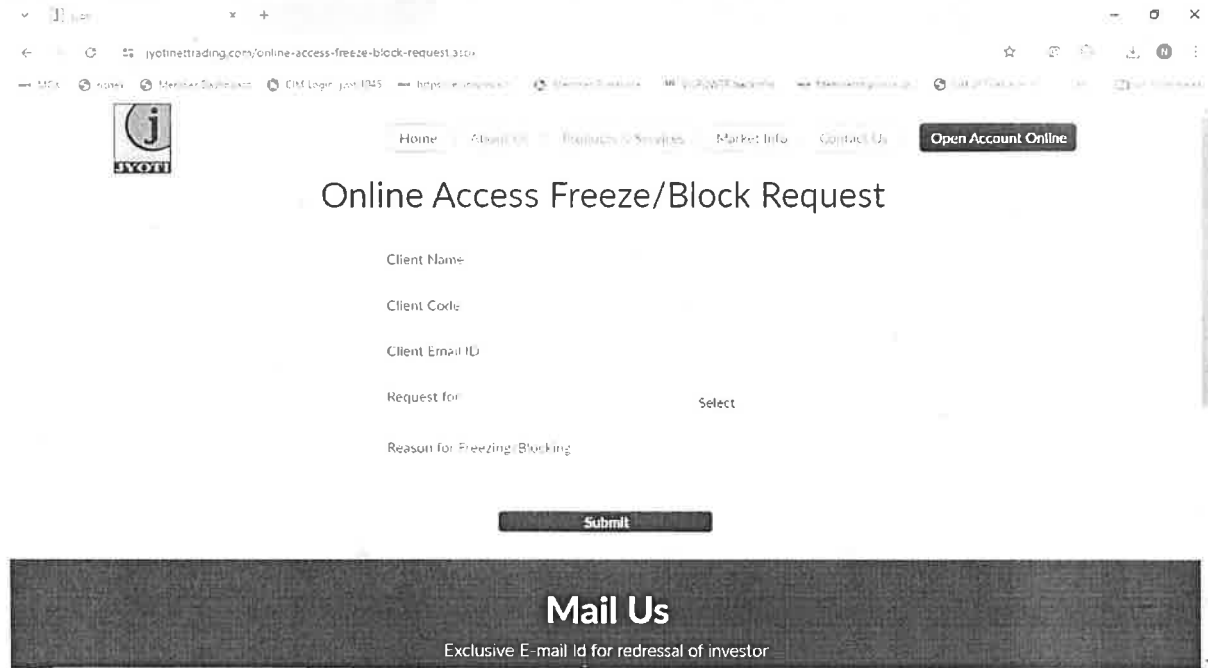
Procedure 1

Go to Our Website WWW.JYOTINETTRADING.COM

Follow the below mentioned step to place the request click on Voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities



After Click below screen open for Voluntary freezing/blocking the online access



Fill the Required Details and click on submit button

The screenshot shows a web browser window with the URL `jjyotinettrading.com/online-access-freeze-block-request.aspx`. The page features a navigation menu with links for Home, About Us, Products & Services, Market Info, Contact Us, and an Open Account Online button. The main heading is "Online Access Freeze/Block Request". The form contains the following fields:

Client Name	DHARMENDRA KUMAR SINGH
Client Code	CDS15
Client Email ID	dharmendracomp@gmail.com
Request for	Freeze Account
Reason for Freezing/Blocking	I want to Voluntary freeze my online access of trading software

At the bottom of the form is a "Submit" button.

Mail Us
Exclusive E-mail Id for redressal of investor

After submitting the details acknowledgment windows appears and our team will take appropriate Action.

This screenshot shows the same website page as above, but with a white pop-up window in the center. The pop-up contains the following text:

We have received your details. We will process your request and may contact you in case of any concern/clarification.

At the bottom right of the pop-up is an "OK" button. The background form and navigation elements are dimmed.

Procedure 2

You can send Email from your registered Email Id and Mobile No to Dedicated Email id

Email: stoptrade@jyotiportfolio.com

and

You can Call/SMS from your registered Mobile No to Dedicated on Contact Number

Contact no. 011-46059446, 011-46059432, 9810159032, 9667501765

for receipt of communication for voluntary freezing/ blocking of the online access
of the clients' trading account.

Our Team will take appropriate action as per RMS Policy and send confirmation to you.

For Jyoti Broking Pvt. Ltd.

Deepak Agarwala
Director