

SECURITIES OPERATION AND RISK MANAGEMENT (SORM) POLICY

Internal Policy in respect of passing of NISM-Series –VII: Securities Operation and Risk Management Certification Examination

Introduction

As per SEBI circular following categories of associated persons associated with a registered stock broker/trading member/clearing member in any recognized stock exchanges, who are involved in, or deal with any of the following:

- a. Assets or Funds of investors or clients
- b. Internal control or risk management
- c. Activities having a bearing on operational risk
- d. Redressal of investor grievances

shall be required to have a valid certificate of NISM Series VII – Securities Operation & Risk Management (SORM) from National Institute of Securities Market(NISM).

Need For the Policy

The Company being a trading member, provisions of the aforesaid requirement is applicable to all its employees & AP involved in the activities as mentioned above.

Exemption

Associated persons handling the basic clerical / elementary functions in the aforesaid specified areas shall be exempted from obtaining the certification of NISM Series VII – Securities Operation and Risk Management (SORM). For this purpose, the company considers following activities as basic elementary level / clerical level:

Internal Control or Risk Management

1. Inwarding or collateral's / Cheques
2. Person performing market entries
3. Maker entry in the database
4. Preparing of MIS
5. Photocopying, printouts, scanning of documents
6. Sending of letters / reports to clients, Exchanges, SEBI
7. Attending Calls, etc.

Redressal of Investor Grievances

1. Inwarding of complaints
2. Photocopying, printouts, scanning of documents
3. Preparing of MIS
4. Maker entry in the database
5. Seeking documents from clients
6. Person performing maker entries
7. Sending of letters / reports to clients, Exchanges, SEBI updation, data entry, uploading on SCORES
8. Attending calls, etc

Activities having a bearing on operational risk and dealing with assets of funds of investors of clients

1. Person performing maker entries
2. Generating of reports, Files
3. Dispatching documents to clients
4. Sending of letters / reports to clients, Exchanges, SEBI
5. Maker entry in the database
6. Preparing of MIS
7. Photocopying, printouts, scanning of documents
8. Attending calls etc.

However, any of the works as stated herein above being performed by such persons, obtaining, NISM-SORM Certification shall be optional provided that they are supervised by his / her supervisor who shall have to obtain / continue to have NISM – SORM Certification or such other prescribed certification at all times.

For Trustline Group

Authorised Signatory