

Sukesh Jain Securities (P) Ltd.

Internal policy - Securities Operation & Risk Management (SORM)

SEBI issued Notification No. LAD-NRO /GN /2010- 11/21/29390 dated. December 10, 2010 according to which following categories of associated persons, i.e. 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) Redressal of investor grievances
- (c) Internal control or risk management
- (d) Activities having a bearing on operational risk

Shall be required to have a valid certificate of NISM Series-VII-Securities Operation & Risk Management (SORM) from National Institute of Securities Market (NISM). NSE & BSE has also issued circulars requesting the Members to comply with the requirement of said SEBI Notification.

Requirement of Policy:

Sukesh Jain Securities (P) Ltd. being a stock broker of BSE Ltd. (BSE), provisions of the aforesaid requirement is applicable to all its employees involved in the activities as mentioned above.

Associated Person:

"Associated Person" means a principal or employee of an intermediary or an agent or distributor or other natural person engaged in the securities business and includes an employee of a foreign institutional investor or a foreign venture capital investor working in India.

Regulator Reference Circulars:

SEBI Notification No: LAD-NRO /GN /2010- 11/21/29390

NSE Circular No: NSE/INSP/16536 & NSE/INSP/ 27495

BSE Circular No: 20101215-19 & 20140902-8

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, Sukesh Jain Securities (P) Ltd. considers following activities as basic elementary level clerical level.

- Inwarding of collateral's/Cheques/Complaints
- Person performing Market entries
- Maker entry in database
- Photocopying/Scanning /Print outs of documents
- Preparing MIS
- Sending Letters/Reports to clients/Exchange/Regulators
- Generating Reports, Files.

However, any of the work (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.

Note: This policy has been considered and adopted by the Board of Directors of the Company.