NJ INDIA INVEST PRIVATE LIMITED

RISK MANAGEMENT POLICY

INTRODUCTION:

This is a policy for guiding the stock broking operations of NJ India Invest Private Limited ('NJ' or 'the Company').

CLIENT REGISTRATION:

This is the first stage of contact with the client. It is very important to take adequate details from the clients to maintain a record.

Company registers clients by obtaining the Client Registration Form which is the foremost requirement of Exchanges for maintaining account based relationship with client. In this form the KYC and other necessary details of the clients are obtained & updated as per the latest SEBI circulars issued from time to time. The client is allowed to open both, Trading and Demat accounts with the single account opening form.

RISK DISCLOSURE DOCUMENT:

Trading in the securities market involves risks of various nature. The clients are required to be properly educated and informed about the risks involved and the company as a policy will issue the Risk Disclosure Document to all its clients and obtain an acknowledgment alongwith the account opening form.

RECEIPT FROM & PAYMENTS TO THE CLIENTS:

All the receipts of funds from the client will be accepted only in the Member Bank Accounts which are tagged as "Upstream Accounts". Whereas all the payments to the client will be made only from the Members Bank Accounts which are tagged as "Downstream Accounts" as per regulatory requirement. The receipts and payments shall be allowed only in the client's bank account(s) registered with NJ.

RECEIPT AND DELIVERY OF SECURITIES:

The securities pay-in & pay-out will be done only with the Demat account mapped to the UCC. For pay-in, securities will be blocked in client Demat & debited on settlement date by the respective Clearing Corporation.

CONTRACT NOTES:

Contract notes will be issued to the clients within 24 hours from the trade taking place. Additionally, the clients can view the contract notes for trade executed by them on the trading portal.

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STATEMENT OF ACCOUNTS:

The statement of accounts will be sent to the clients as per timelines prescribed by Exchanges/SEBI from time to time.

EXPOSURE TO THE CLIENTS:

The limit to the clients will be provided as per the available clear ledger balance.

TRADING IN (GRADED SURVEILLANCE MEASURES) GSM SECURITIES, ILLIQUID SECURITIES & UNSOLICITED SMS/WHATSAPP/VIDEOS SECURITIES.

Exchange provides the list of GSM, illiquid scrips, etc. on its website. The clients shall not be allowed to trade in securities that fall under GSM Securities above Stage 0,, Illiquid Securities and Unsolicited SMS/Video, IRP as per IBC, ASM IBC categories.

PROCESS AND TIMELINES FOR CLIENTS TO REQUEST FREEZING/BLOCKING AND UNFREEZING/UNBLOCKING OF TRADING ACCOUNTS (As per SEBI circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated 12th January, 2024, BSE notice no. 20240408-12 and NSE circular no. NSE/INSP/61529 dated 8th April, 2024 and amendments from time to time).

In case of any suspicious activities found by the clients in their Trading account, they can avail this facility of voluntary freezing/ blocking of their Trading account by using the Chatbot available in their NJ E-Wealth account login or by sending an email at stoptrade@njgroup.in through their registered email IDs available with NJ.

The request received by NJ shall be validated. The timeline for freezing/ blocking of the online access of the clients' Trading account shall be as under: -

Scenario	Timelines for issuing acknowledgment as well
	as freezing/ blocking of the online access of the
	Trading account.
Request received during the trading hours ¹	Within 15 Mins
and within 15 mins before start of trading.	
Request received after the trading hours and	Before the start of next trading session
15 min before the start of trading.	

¹Trading hours shall be as follows:

Capital Market Segment: 9.15 am to 3.30 pm.

Post freezing/blocking the Trading account, a communication shall be sent on the registered mobile number and registered email ID of the client, stating the online access to the Trading account has

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been frozen/blocked and all the pending orders including live Stock SIP in the Trading account, if any, have been canceled.

Further, the request to re-enable the online access of the trading account can be made by sending an email to <u>starttrade@njgroup.in</u> stating your E-wealth (Trading) account details (i.e UCC, PAN and Name) from your registered email ID and the same will be processed promptly and within a reasonable time.

REVIEW OF THE POLICY

The Board of Directors of the Company shall review the policy at least once in a year or as and when required.

The board hereby considers and approves the Policy duly amended through a circular resolution on 20th July 2024.

Place: Surat Date: 20th July 2024

- BY MANAGEMENT ORDER



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