DETAILING OF SIGNIFICANT POLICIES AND PROCEDURES APPLICABLE TO CLIENT DEALINGS

1. Refusal of orders for Penny Stocks

"Penny Stocks" are defined as shares having a low market price. Almondz Global Securities Ltd (AGSL) / Almondz Commodities Pvt Ltd (ACPL) will allow trading in penny stocks, but would charge brokerage on a different basis. While in normal transactions (i.e. transactions other than in "Penny Stocks"), AGSL / ACPL shall charge the applicable brokerage rate which is a percentage of

the transaction value, for "Penny Stocks", the brokerage would be charged in paise per share.

To illustrate, a brokerage tariff applicable to the Client would read as under:

BROKERAGE SLABS				
Delivery transactions (%)	Minimum rate on delivery transactions (paise per share)			
0.50%	10 paise			

The minimum rate in paise is the rate that would be applicable to "Penny Stocks". To further illustrate the applicability of these rates, please see the examples below:

Illustration - I:

If the Client purchases 100 shares of Reliance Industries @ Rs. 2000/- per share, then the formula by which the applicable brokerage would be determined is as under:

(a) Normal Rate: 2000 x 0.50% = Rs. 10/- per share

(b) Minimum rate: 10 paise per share

In this case, the higher of (a) or (b) would be charged i.e. Rs. 10/- per share which is the Normal rate. Illustration - II:

If the Client purchases 100 shares of XYZ Ltd. @ Rs. 15/- per share:

(a) Normal Rate : $15 \times 0.50\% = \text{Re. } 0.075 \text{ per share}$

(b) Minimum rate: 10 paise per share

In this case, the higher of (a) or (b) would be charged i.e. 10 paise per share, which is the Minimum rate.

2. Setting up Client's exposure limit

The Client's exposure limits means the extent to which he/she can take the position on the cash and/or equity derivative and/or currency derivative markets.

The Exposure limit given to the Client is based either on the clear cash balances available in Client's ledger account with AGSL / ACPL ("Clear Cash balance" refers to only such balances as have been received in Client's A/c after clearance from Bank and does not contain any cheques in transit or under collection) OR the amount of such stocks available in Clients' DP A/c as are acceptable to the Broker (in terms of approved list), after application of hair cut margin.

The exposure limit could be equal to the above aggregate amount of cash balance and securities value (after hair cut), or be a multiple thereof, depending on the products or the markets in which the exposure is sought.

3. Applicable brokerage rate

AGSL / ACPL applicable brokerage rates are as under:

BROKERAGE SLABS									
Delivery	Minimum rate	Intraday	Minimum rate	F&O	Options	Delayed	Currency		
transactions	on Delivery	transactions	on Intraday	transactions	contracts	Payment	Derivatives		
(%)	transactions	(%)	transactions	(%)	(Rs/contract)	Charges			
	(paise)		(paise)			(% pa)			

4. Imposition of penalty / delayed payment charges by either party, specifying the rate and the period

While we do not permit funding (except under Margin Finance Scheme as defined by the Stock Exchanges), there can be instances where we may have to fund delivery settlement and/or margins for short periods. Delayed Payment Charges (DPC) would be applicable @ ____% p.a. for the actual number of days that we are out of pocket for such instances, which are specified below:

- (i) If there is a delay in payment of dues by the client for settlement in the Cash market; or
- (ii) Delay by the client in payment of margins/Mark to Market in the derivative markets; or
- (iii) Substitution of margin by providing collateral in the form of 'Approved Category Shares' in Demat A/c.

5. The right to sell clients' securities or close clients' positions, without giving notice to the client, on account of non-payment of clients' dues

If Client position in the Cash or Derivative markets is built on leverage i.e. without the backing of 100% cash margin in the Clients' ledger account, then these positions can be terminated at any time (including before pay-in-date) without notice to the Client, on the occurrence of the following:

- (a) Where in the cash market, stocks have been bought without 100% cash margin and the value of the purchased stock and/or stocks available for collateral is eroded on account of adverse market fluctuation.
- (b) Where stocks are sold short in the market and the margin available for this short sale is being eroded on account of adverse market fluctuations.
- (c) Where margins provided by the Clients for derivative position are being eroded on account of adverse market fluctuations.

6. Shortages in obligations arising out of internal netting of trades

In case of shortages in internal netting of trades, these would be closed out by Almondz at the auction price declared by the respective Exchange. In case no auction rate is declared the close out will be at the highest price from trade date to T+2 plus 3% on T+2 evening.

7. Conditions under which a client may not be allowed to take further position or the broker may close the existing position of a Client

Following are the conditions under which a Client may not be allowed to take further position or AGSL / ACPL may close the existing position of a Client:

- (i) If the Client does not have 100% cash margin to back an exposure;
- (ii) A Client may have availed the facility for taking positions without 100% cash margin in the past. This would not be allowed to act as a precedent and a fresh position may be denied unless it conforms to (i) above;
- (iii) Transactions of a nature which are prohibited by the Regulator

8. Temporarily suspending or closing a client's account at the client's request

A formal letter of request by way of hard copy / email would need to be submitted for temporary suspension or closure of client's account alongwith reason of such suspension or closure. This request would be acceded to, only if there is positive balance in the account i.e. there is no debit balance in his/her account.

9. Deregistering a Client

Place:

The procedure for deregistering a Client is currently	the same i.e. deactivating the Client's account on a	8
formal request.	XO	