

# **PARDIWALA SECURITIES PVT. LTD.**

**MEMBER: BOMBAY STOCK EXCHANGE LTD. (SEBI REG NO. INZ000224933)**

**4A/EXAMINER PRESS BUILDING ,DALAL STRRET.FORT MUMBAI-400001**

**Email:rahul@rkpspl.com ,pardi\_33@hotmail.com.Tel-022 22652692,22651196,22615168.**

**CIN NO – CIN NO.:U67190MH2010PTC204022.**

---

## **Internal Controls**

### **1. Details**

#### **POLICIES & PROCEDURES :**

Date of starting of business	21 <sup>st</sup> December 2010.
Background of company	Our company is incorporated on 10 <sup>th</sup> june 2010 in the state of Maharashtra having Registered Office at Mumbai. Promotors of the Company are Shri Ramesh pardiwala, kokila pardiwala (wife) and Rakesh & Rahul Pardiwala (Sons). All our clients are Retail clients & most of them are delivery based.

#### **2. Client Code Modification : Policy Attached**

#### **3 PMLA : Policy Attached**

#### **4 Introduction/Registration of clients:**

Basis of accepting as client	Based on introduction by existing clients or Directors of the company.
Procedure for In-person verification of clients and maintenance of proof for the same, specifically in respect of out station & sub-broker clients	In person verification for local / outstation client done only by employee/director of the company at our office only.
Whether Client Registration Documents (CRD) given to new clients & to existing clients, on demand. Also, whether UCC & email ID communicated to clients on CRD or separate letters, and proof for the above	CRD is given to all the client along with account opening letter containing all details. We also send mail to new clients.
Do you outsource client registration modalities?	We do not outsource client registration.

Do you entertain walk in clients?	We do not entertain walk in clients.
Process of record keeping and retrieval of client registration document	We keep all current records of one year old at the Registered office in physical mode & before that period, all Records are kept at Vile Parle, Mumbai store room. All records & KYC Documents are in physical mode & can be retrieved through client code number.

## 5 Uploading of KYC documents to KRA:

All clients in our Company are allowed to trade only after they have completed the Registration process including the filling of Account Opening Form & KYC Documents (KYC Documents to be done in case of non KRA Registered clients). For Clients who are already registered under KRA a softcopy of the same is download from KRA Authority. In case of fresh KRA the scanned copy of the same is uploaded to KRA registering Authority for registration at their end. We have registered with all the KYC registration Authority like CVL KRA, DOTEX ,NDML .

## 6 Funds:

System of pay in and pay out of funds from / to clients	Pay In and pay out are made as per scheduled time of Exchange except in case of clients who has submitted running account authorisation. All pay-in & pay-out of funds are carried out through client bank account.
System & source of pay in and pay out of funds in case of Own trading	We don't do any trading in OWN account
Procedure of Margin collection, if any from clients & maintenance of records thereof	We are dealing in cash segment so we don't take any cash margin from clients. In most of the cases, pay-in amounts received before pay-in or within 2-3 days of pay-in.
Any funding is done to the clients	Only settlement obligations funding for 3-4 days of pay-in.
Credit / transfer of Dividend to the client / own dividend	We immediately credit the receipt of dividend to the particular client account.
Procedure followed in case of default by client/sub broker's client	Till date, we have no come through any instances of default from clients except insignificant amount of below Rs.100/-
Payment to sub brokers / remisiers	We don't have sub broker / remisiers .
Any third party transfer of funds? If yes policy in this regard	We strictly not transfer any funds to third party.

## 7 Terminal :

Procedure of accepting & placing of orders	All Orders are received on telephones or personally by clients. We immediately place the
--	--

	order in the BOLT System whether it is at the market rate or limit order.
Factors determining the trading limit for each terminal / client	Payment history are the main criteria. We also see his financial data & past trading pattern.
Control over operator to ensure that he is entering authorized trades only	We checked all trade in our 0 terminal using market hours.
In case where terminals have been located abroad, then opening of terminal abroad is in compliance with SEBI guidelines	We have only One terminal which is operated by Rahul pardiwala ,we dont have any terminal abroad .

### **8 Contract Notes :**

Whether printing of contract note is centralized? If not, place from which CN are printed.	Creating & printing Contract Notes is centralized only.
Procedure for printing CN in case of outstation clients / sub broker clients	We sent CN to outstation clients through, courier/post& we also send by ECN. We print CN at our office.
Basis of numbering	Yearly
System for maintaining duplicates & acknowledgement for CNs	We maintain log file of all ECN. We also maintain acknowledgement of client received through courier like POD.
Whether consent for change in email id is obtained through physical letter from clients .	No we tell our clients to send us the mail on our registered mail id .

### **9 Securities:**

System of pay in and pay out of securities from / to clients	Securities are received from and given to only registered demat account of the clients
Separate Own Beneficiary Account maintained or not	Yes,
Separate Client Beneficiary Account maintained or not	Yes,
Client wise segregation of securities maintained or not	We are having system of client wise segregation of securities.
Whether Clients' securities maintained with Member	Yes, in few cases of running clients we transfer the securities in a separate clients beneficiary account maintained with us. Subsequently transfer the shares to his

	account or make pay-in if he sold.
Procedure for check on Third party security transfer / acceptance	We don't accept third party transfer/acceptance.We monitor all the pay-in securities manually on daily basis.
Policy to ensure that client's securities are not mis-utilised for own purposes or for any other client	Mr Rahul Pardiwala compliance Officer of the company personally looking after pay-in & pay out of securities strictly come in & goes out to respective client only.

#### 10 Monthly/Quarterly Settlement :

The accounts of the clients will be settled in accordance with rules & regulation & guidelines issued from time to time by SEBI & Exchange .

The settlement of funds / securities shall be done as per pay in /payout of the exchange ,unless clients specifically authorized to maintain running account .

The authorization shall be dated and shall contain clause that the clients may revoke the authorization at any time .Authorization shall be signed by the clients only & not by POA holder.

No inter-client adjustments are allowed for the purpose of settlement of running account.

We don't retained securities/funds towards any margin obligations,because all clients deal in delivery only .

#### 11. Statements of Accounts & Daily Margin Statement

Whether statement of accounts for funds and securities are issued on monthly or quarterly basis	We send statement of accounts for funds and securities on quarterly basis.
Whether statement of accounts is issued from the branches/sub-broker's office/authorized persons office. If yes, the procedure followed for issuance and the maintenance of the duplicates and proof of delivery	No,the statement of account are print from our main office only. We send statement of account through email & hand delivery to all our clients.We obtain Signature as a token of acceptance in the register.
Whether statement of accounts are issued physically or digitally?	Both.
Whether daily margin statement is issued as per prescribed format? The mode of sending the same to the clients?	YES, we courier the margin statement along with the contract notes.
Whether the statement explains the retention	Yes statement of accounts showing

of funds /Securities and the details of the pledge	retention of funds/ Securities .
--	----------------------------------

## 12. Execution of POA (Power of attorney)

Please specify in whose name POA has been taken (trading member, its employees or representatives or sub-brokers)	POA is taken in the name of Pardiwala Sec Pvt Ltd only from clients for transaction related to pay-in only (on market transaction).
Process adopted for execution of POA	POA issued by the client in favour of Pardiwala Sec Pvt Ltd ,for collecting the shares by PSPL Dp ie BOISL towards sale made by the client .

## 13 Opening & closing of branches :

We have one Only Registered office in Mumbai , we don't have any branches.

## 14 Closure of client accounts / dormat account : Policy attached

## 15 Receiving and Execution of Orders :

Mode of order acceptance at HO/Branches/Sub-brokers office/AP's offices	We have only one registered office all order accapantance at same office only.
Any document is maintained for the clients who personally walk into the office and place the order?	No, we don't maintain any document for walk in clients.
System for identifying authenticity of caller when the order is placed through telephone	We recognize our client voice on telephone .
Mechanism put in place to limit the cumulative value of unexpected orders from the terminals .	Yes we have only one terminal but all trading limits set from BSE RTRMS online.

## 16 Portfolio Manager :

We are not acting as a portfolio Manger so we donot have any policy .

## 17 Brokerage Charged :

We have some slab of brokerage based on clients risk & his trading pattern.  
We don't provide any brokerage schemes .

**18 Client Margin & collection of reporting margin**

**We have Back office system in place to monitor to the clients margin. We trade only in cash segment no future & option trading so we don't collect any margin from our clients . & we don't send any margin report mail to our clients. Majority of our clients are do delivery base transactions,.**

\*\*\*\*\*