

Procedure for Client Registration, Documents maintenance

Persons are added as clients only after they had a meeting with the Employees / Authorised Persons / sub-broker of the company

The company has taken due care in the preparation of the Client Registration Forms in the format as prescribed by SEBI and Stock exchanges.

The forms which are duly filled and signed are collected at the Branch offices.

In-person Verification is done by employees / authorized persons / sub brokers

Verifying Personnel's Name, signature is stamped in the Registration form as well as on the copy proofs enclosed

The original forms and supporting documents are then forwarded to the Head office.

At Head Office, they are first entered in the inward register and then thoroughly verified depending upon the nature of account type and the segment selected

Defective forms are sent back to branches for rectification with a covering note.

For all satisfactory forms, PAN is checked with IT site

Then information are keyed in back office software based on the Original form.

Another official generates the Unique Client Code and thereby activates the account after cross verification of all the details once again.

The required client details are then uploaded to Stock Exchange site.

After obtaining the Success file, the same mapped in the trading terminal.

A welcome kit including a welcome letter mentioning the Client code, Xerox copy of the Client registration form, Rights & Obligations of stock broker, Sub broker and clients, RDD Policy & Procedure are sent to the Client by post.

The Unique Client Code activated for the client is intimated to the client by means of E-mail

All the Client forms and the supporting documents are kept in safe custody at the Head Office Premises.

All client registration documents, once checked, found complete and verified are stored in safe vaults in a sequential manner

Procedure for UCC Upload

From our back-end, we generate file for the client containing data of market segment, client code, client name, PAN, address in the format prescribed by NSE /BSE. The data generated are thereafter verified with KYC. On the data being found fully correct, the client is uploaded on UCC – site of NSE / WEBX – Site of BSE. After uploading, we run a check, on the UCC-site, by entering the specific client, whether or not the client details are actually uploaded on UCC-site.

Procedure for Sales Practices

The company does not have any separate sales / marketing department.

The company does not have any marketing division and has not launched any promotional schemes for registration / enrollment of clients.

The clients are appraised about the risk disclosure document and make them aware of the contents regarding the risk associated with the securities market.

The company does not offer any freebies to the clients. All the services provided are charged as per the agreed terms.

Procedure for Closure of Client accounts/ Dormant accounts

Dormant Accounts

All dormant accounts (inactive for six months and more) are made inactive in our system. Hence it is not possible to execute a transaction in dormant accounts. However, a client can re-activate his/her/its dormant account by giving us in writing in prescribed format to activate the account and also stating the reason for keeping the account dormant.

Old dormant a/c (2 years old),

In case of clients who have not traded for more than two years, the time they call up execution of any trade then enquiry is made about their non activeness in the share market.

Additionally, their updated financial information is also enquired & called for. Only after they have given the updated financials only then further actions for execution of transaction are carried out.

Closure of account

Closure request letter from the client is obtained in the prescribed format, specifying the reason for closure. The form should be duly signed by the client and should be forwarded to Head office. The signatures are verified. Any pending settlements in the existing code are also thoroughly cross verified. An exit interview over telephone is taken from the HO end.

Then the existing code is deactivated in Back office software. Closure intimation is sent to the client either post through E-mail or through

Procedure for Order Receipt and Execution

The company setup is small and all the clients are personally known to employees / Authorised persons, their financial position is known and the dealer is aware of the risk appetite of the client which helps in better control.

The company has restricted the access to the dealing office only to the employees / authorized persons and sub brokers. The clients are informed of the dealers / authorised persons, sub-broker who would be responsible for receiving, validating and entering the orders on behalf of them.

The orders are received over phone, through employees ,authorised persons, sub-brokers, personal instructions when they are in the office.

The company does not have a telephone recording system as the orders are duly confirmed at the time of entry itself when the orders are inputted in the system.

Procedure for Sending Contract Notes, Daily Margin statement, Quarterly Statement of Accounts to clients

The company sends contract notes and daily margin statements within 24 hours of execution of the trade (ie. Within 1 day) by digitally signed emails to the email id of all the clients, who have an email id.

The activity of sending contract notes, daily margin statement and quarterly statement of accounts to clients has not been outsourced to any person.

The log reports are maintained for the documents sent electronically and in case of documents sent by courier the proof of dispatch (POD) is maintained and in case of hand delivery, acknowledged copies of the documents sent are maintained.

Procedure for Square off of positions / Liquidation of securities without consent of clients

The company does not have a system of squaring off the position of a client or liquidation of securities without the consent of the client. The company tries to have extra margin so that client positions are not forced to be squared off.

The Clients are informed of any increase in margin, or any increase in MTM losses beyond their collaterals

The company provides opportunities to the clients to bring in adequate margin

If payment is not received despite reminders then we square off the positions after giving prior intimation to the clients

Margin calls being made on phone, no record are maintained for the same.

Procedure for Monitoring of debit balances

The monitoring of the debits of clients is done on daily basis.

For the recovery of old Debts we would go through the legal methods like arbitration or court of law and time request the Clients to Pay in parts.

Procedure for Receipt, Delivery of Securities from / to clients

The company has taken POA from clients for meeting there transaction related pay-in to avoid trouble of receiving / giving shares on daily basis.

The POA provides only restricted right and does not provide total control to the broker on the Depository account.

Only few employees of the company are authorised to operate the POA.

The persons authorised are directors or employees of the company with long standing and confidence.

Proper record for securities received / given to the clients is maintained.

The company receives the deliveries of securities from the clients in the pool accounts intimated to the clients.

For delivery of securities company has activated auto payout facility in clients demat account, for which daily report is been sent to the Clearing House / Clearing Corporation.

The company also reconciles its pool, principle, CISA and client beneficiary account on a daily basis.



The company has subscribed for easi facility to monitor online the activities of pool and other accounts.

The company has a policy of maintaining all client shares in a separated Demat account exclusively held from Client beneficiary / client margin shares.

The person in charge of securities has proper control and checks that the client share are used only for the client to whom it belongs.

Additionally daily reconciliation of the shares lying in the demat account and the client wise details as per the back office report is done on regular basis.

Procedure for Transfer of trades

The organization has a policy of not considering any transfer of trades in the back office and all updates are done in the post closing or during market hours.

The branches are warned in case of transfer of trades for such transfer of trades and cautioned that severe actions would be taken if such errors continue.

Limits setting for exposures & turnover for clients, terminals

The limits and exposure is provided as per the clients debit and credit positions, along with stocks lying with us, margin requirement for the open positions in f&o segment, MTM check and ageing report is also taken in consideration. .

Branch & Sub-Brokers Audits

We have designated a Compliance team which is headed by the Compliance Officer for periodic inspection of Authorised person & Sub-Brokers Audit on periodic basis.

The branch / sub-broker audit covers areas like No Cash dealings with clients, Check whether any illegal or unauthorized activity is being carried out at the said location, Operation of trading terminals, Advertisement are issued only after due permission from head office and/or Exchange, Display of Notice Board and SEBI registration certificate, etc.

We ensure that all the areas as per the exchange norms are covered under the inspection. After the inspection a report is provided to concerned office with findings of the inspection along with the suggestions for better compliance.

We have appointed M/s. Sriram & Associates for conducting the internal audits as per the exchange norms.

Findings & suggestions of the Internal Auditors are referred to audit committee which is designated to comply with the findings of the internal & rectify the discrepancies if any found.

Procedure for Allotment of trading terminals

The terminals are installed / activated only after complying with the regulatory requirement of informing Exchange and uploading of the details of the authorized user.

The company carries out proper due diligence before opening of the branch is carried out.

The Inspection team will make the surprise visit to the branches to check that only authorized persons are operating the terminal.

The senior management spend regular time to access the working of the branches and various concerns including the volume vis a vis clients vis a vis clients profile and activity pattern are considered.

Procedure for Investor Redressal Mechanism

The company shall take necessary steps to ensure that all its dealing offices / branches / sub-broker offices / main office etc. shall display a notice board which contains the name and address of the Company along with the person in charge of the respective office and telephone numbers of the office. Also all the bills and contract notes shall contain investor redressal email i.e. investorgrievance@apollomoney.com.

On receipt of any investor complaint, whether physically or post or through designated email id of the company, a copy of the same will be sent to Compliance Department as well as the Management of the Company. Simultaneously, the details of the same are also entered into the Register of Complaints, maintained by the Company.

Based on the contents of the complaint, the same will be forwarded to the respective department of the Company and it shall be the responsibility of the Compliance department to gather the facts / data about the complaint, reasons thereof etc. in consultation with the respective department of the Company.

An acknowledgement is be sent to the client about the receipt of his compliant within reasonable time and also a broad time frame required for the redressal of the same.

Upon redressal of the complaint, the client shall be intimated about the same and shall also be given an option that if he is still not satisfied by the redressal mechanism of the Company, he can address the complaint further to the concerned Stock Exchange.