## **SAROJ SECURITIES**

309 KAN CHAMBER ,14/113 CIVIL LINES , KANPUR – 208 001

Member: The National Stock Exchange of India Ltd.

SEBI Regn No :INZ 000224427

## Policy on opening and closing of branches/sub broker offices

- 1. Whenever, we decide to consider for opening any new branches / Sub broker, detailed market survey is conducted and complete due diligence is carried out to ensure the viability of branch.
- 2. We would carry out at least 10 % of branch inspection every year and check all aspects as laid down by SEBI like display of notice board, SEBI certificate. Further, we also verify that the branch does no cash dealing with the clients. In case of any non compliance is observed, the branch manager is given 30 days to take corrective measures and to adhere that the branch comply all the rules and regulations of NSE and SEBI.
- 3. All CTCL IDs are required are uploaded to exchange in ENIT and after successful up-load, branches are allowed to Log in .It is further ensured that the branches use software provided by licensed vendors only .
- 4 We would carry out surprise inspection of the branches and ensure that no unauthorized use of the trading terminal is done by the branches.
- 5. We would convey to the clients regarding closure of branch by telephone and 30 days advance notice is given to clients at their registered address. To ensure smooth and proper closure of Branch, the customer registered with the said branch would be given offer to get itself associated with the Registered office of the Member or any of the branch which suits the customer .Actual Settlement of the funds and securities for all the customer registered with the said branch would closely be monitored by Compliance Officer to avoid any inconvenience for the clients registered with the branch.
- 6. There is a proper monitoring mechanism to identify sudden increase / decrease in level turnover from any specific branch.
- 7.We have a centralized system for the back office and accounting procedures. The branches are under direct control of the management.
- 8. All Branch Managers should be experienced, knowledgeable and qualified. Before Start of Business, Branch Manager is properly briefed about conducting Share Broking business. All Branch Managers should be instructed to comply with guidelines/instructions of SEBI

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/Exchanges and ensure best service to our Clients.

9.In case of closure of Sub broker office , proper diligence is maintained to ensure the surrender of sub broker SEBI Registration certificate and upload of closure of branch/sub broker office in NSEIL interface , to avoid any malpractice.

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