NAMAH CAPITAL RESOURCES LIMITED

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Internal Controls

Write up on the Internal controls followed by you with regards to:

• Registration of Clients.

Checking CRF complete in all respect. Collection & Verification of all the Documents. Personal Interview of the Client. PAN No to be verified with IT site. Executions of Broker Client Agreement, Risk Disclosure Document. Allotment of Unique Client Code. Upload of UCC in NSE Enit. Informing details to Clients through email.

• Receiving, validating & entering the orders of clients in the trading platform.

Allowing order after completing of Registration Process and Allotment of UCC Execution of Order only after identifying the Customer. Before accepting any order from the client it should be check whether the order is market or limit. Before Execution of Transaction to see the Quantum of the Order. Margin to be collected if needed.

• Collection and Release of Payments to clients

Payment to be collected on T-day for client debit. After Receiving the Delivery from Client and Verify from Client Demat A/c payment are made within 24 hrs payout. If running a/c is maintained by the client payment will be made on client's request. No Cash transactions.

• Collection and maintenance of Margins.

Adequate Margin to be maintained with the Exchange for Exposure limit. Collection of Margins from the clients wherever applicable.

• Collection and delivery of Securities to the clients.

Accepting of Share from Client Demat A/c only. Third party Shares not accepted. Delivery of Shares to Client Demat A/c within one day of payout. If client have debit balance Delivery transferred to Our Beneficiary A/c.

• Monitoring /DP Operations etc.

Check on daily basis the transaction statement and holding statement with back office report. Check Deliveries are received from Client A/c.

• Monitoring Debit Balances

Branch Head and Compliance regularly monitoring debit balances of clients. They do

age analysis of payment outstanding from the clients on monthly basis and categoriesthme as

i)High risk

ii)Medium Risk

iii)Low Risk.

High Risk Clients Those clients whose outstanding dues remain more than 30 days NCRL puts them into high risk category and efforts are made to realize the money at the earliest. And NCRl puts them under watch for further transactions.

Medium Risk Clients-Those clients whose outstanding dues remain more than 15 days but less than 30 days, Namah Capital Resources Ltd.puts them into medium risk Category. And efforts are made to realize the money at the earliest.

Low Risk Clients -Those clients whose outstanding dues remain more than 7 days but less than 15 days, Namah Capital Resources Ltd puts them into low risk category.

Exposure to the clients

In capital market segment Clients exposure limit varies from client to clients . Management decides on Exposure limits to the clients.

In future & option and derivative segment, clients exposure limit depend on margin receipts from clients.

• Operations & Compliance Requirements.

Giving training to each department person for their department related compliances. All Daily Routine Stock Compliance are done at Department level and where monitored by Compliance Officer.

• Payment of Dividend etc.

Dividends are Credited to respective Client A/c after identifying the Beneficial Owner on fortnightly/Monthly Basis.

• Continuity planning /Alternate plan in case of disasters etc.

In case of disasters we have system to access trading system from NSE Contingency Pool. We have two leased line at our main office. In addition to the same we have ISDN connectivity for backup.

• INVESTOR REDRESSAL MECHANISM.

Investor grievances register is maintained centrally at H.O.

An exclusive e-mail ID to enable the investors to register their complaints is designated

Compliance Officer daily monitors Investor complaint.

If Compliance Officer do not redress any compliant in 15 days then it is monitored by the whole time director

For, NAMAH CAPITAL RESOURCES LTD