

Policy on Risk Management System

1. Overview:

Risk Management is an important aspect for any organization. A poorly planned risk management system may result in the compromise of the safety and security of the business operation of the company as well as of the clients.

M/s Zanskar Securities Pvt. Ltd. (Referred to as '**Company**') has applied Risk Management policy to counter these situations which may result in loss to the organization/system.

This policy identifies the set of measures which are part of company's security programs. Risk Management policy is a policy towards safe and secure environment with respect to client obligations and reduce risk at the minimum possible level.

2. Scope:

The scope of this policy includes all personnel who are dealing with **Company** and are associated as an employee, client & Authorised persons (APs) or in any other way which may affect the operational activity of **Company**.

- **Deposit calculation:** Deposit is calculated at customer level after netting off ledger balance in all segments and margin pledge shareholding lying in Zanskar. Margin is calculated as follows:

Margin = Ledger Balance (Dr/Cr) + Net value of margin pledge shareholding after haircut.

Valuation of margin pledge shareholding: It is calculated based on previous day's closing price. Net valuation is calculated by applying appropriate haircut based on VaR margin percentage specified by the exchanges or Zanskar prescribed rates, as the case may be.

- **Margin Reporting**

- For same day margin requirements, clear ledger balance as on date will be considered.
- Ledger balance calculation will be done by netting off balances across segments i.e. Cash, F&O, Currency and Commodity.
- Shares in Margin pledge / Client unpaid securities account with previous day's valuation across all segments, after Zanskar prescribed haircut, will be considered.
- Post valuation/calculation of the above, cash segment will be given first preference and in case of excess margin, the same will be considered for reporting of FNO, Currency Derivatives, MCX & then NCDEX.
- Extreme market conditions: Limits are assigned based on credit in the ledger. In such conditions, clients will be allowed to buy only to the extent of ledger credit available.
- **Short selling** in equity is not permitted under the Margin product. It is only allowed when using the Intraday product.

- All other terms & conditions including levying of margin shortfall penalty will remain as is and in line with regulatory requirements.
- **Single order quantity and value cap:** In order to minimize loss from possible order punching errors by a dealer while executing the transaction for a customer, Risk Management of the company puts restriction by capping the maximum quantity and value per order. Orders exceeding that maximum quantity or value cap will be rejected. Zanskar also sets terminal level limits to contain loss from erroneous trades getting executed. Zanskar shall not assume any liability in respect of orders rejected by reason of their quantity or value exceeding the cap value.

In Case of bulk / block deal, prior approval from Zanskar Risk & compliance department will be required

3. Risk Management System:

The Business model for **Zanskar** consists both **Zanskar** owned Branches and Business Associate Offices (Authorized Persons). The clients are linked or mapped to these branches or Associate Offices, and are engaged in trading from these branches. Apart from the trades executed from Branches, there are certain clients who are conducting online trading using the internet / wireless trading platform of **Zanskar**. Controlling and monitoring of these trades are done from RMS surveillance dept.

3.1. Major Functions of RMS:

- Allocating exposure to the clients' trading account and enabling the clients' to do trades.
- Restricting any client from making transactions beyond exposure level per transaction/day and/or per scrip based on quantity & value.
- Monitoring of orders & trades by clients. Checking of order rejections and increasing Exposure, if required.
- Monitoring the MTM profit/loss incurred out of trades, comparing the Actual Margin requirements of clients and the Total Margin available for clients on a one to one basis and initiating remedial actions, if required.
- Decision with regard to squaring off positions on account of debit balances, MTM loss or Margin shortfalls or any other reasons that may come across.
- Suspending/Blocking of client based on instruction received by the KYC or any other Department or statutory orders of non-compliances or for non-fulfilling the information sought from the client.

In short, the Risk management in relation to all the trading activities for Clients is handled by RMS Dept.

3.2. Trading and Limit Setting:

- All the employees/APs designated for the trading activity should be adequately qualified and should be holding appropriate certificates as per the guidelines prescribed by SEBI and the exchanges.
- All the above employees/APs should be allotted a unique user ID for their trading platform which is to be

password protected.

- Each user should be given a pre-set limit for the trading activity as per the availability.
- Each client registered with the **Zanskar** needs to provide adequate Margin (Upfront) by way of funds and/or securities through Margin Pledge before he/she wishes to execute the trade. On receipt of the adequate margin/collateral from the client, he/she will be able to put buy or sell orders through **Zanskar's** trading platform either online or offline. Client shall be granted applicable exposure on clear fund/collateral balance available in his/her trading account. Client shall require fulfilling the Peak Margin requirement at all time.
- In cash segment client needs to deposit minimum margin and/or 20% of traded value margin on an upfront basis and M2M loss and/or other/additional margin is required to be cleared within T+1 day. No buy/sell order can be allowed without depositing adequate margin.
- In respect of sale of shares by a client for which early pay-in (EPI) request via Block mechanism has been accepted by depositories and credit entry is posted of the sale value of the shares in the ledger account of the client, EPI value may be considered as margin collected towards subsequent margin requirement of the client. Further, the entire EPI value of sold shares/securities without reduction of 20% upfront margin shall be available as margin for other positions across all the exchange/segment(s) as per guidelines revised by exchange(s) via circular NSE/INSP/64391 and BSE 20241004-61.
- In case of Derivatives (F&O/Currency), It is mandatory for client to deposit Initial (SPAN) margin, Extreme Loss Margin, Net buy premium on upfront basis and delivery margin, MTM Loss etc. by T+1 as may be imposed by the exchanges from time to time.
- In case of Derivatives (Commodity), it is mandatory for client to provide Initial Margin and Extreme Loss Margin on upfront basis and other Margins (MTM loss, delivery margin, additional/special margin) by T+2 as may be imposed by the exchanges from time to time.
- Client must deposit Mark to market losses (MTM) by T+1 day in case of Cash segment/F&O/currency derivative and by T+2 in case of commodity derivatives. In case of margin shortage applicable penalty will be levied to the client as prevailing rules and regulations and policy mentioned in below in short margin penalty head.
- The term 'Exposure' means the extent to which the client's initial deposit can be utilized for trading activities.
- While granting the exposure limit, collateral in the form of securities by way of margin pledge will be valued as per the latest available closing price on the exchange after applying appropriate haircut as per the applicable VaR or VaR+ ELM and Additional/Adhoc Margin as provided by CC.
- For the purpose of client Margin collection and reporting, the Zanskar shall compute the value of securities as per the closing rate on T-1 day as reduced by the appropriate haircut at a rate not less than the VAR margin rate of the security at the beginning of T day.
- All Intraday position (Equity Cash & Equity Derivatives) shall be squared off 3:15 P.M onwards automatically. In case of Buying/Selling cap, **the Zanskar** would not be able to square off such position and therefore any shortage penalty or loss arises due to such situation shall be borne by the respective client.

- Upon the MTM loss on open position reaching to 70% or above of the available margin (such %age may be curtailed or enhance by the **Zanskar** in its absolute discretion depending upon the prevalent market condition), the position shall be cleared/Squared off either from the respective branch or associates offices concerned/terminals or through RMS dept. or by the system automatically.
- **The Zanskar** may allow client to trade in newly Listed Shares (including SME and/or IPO) & Illiquid Securities subject to certain conditions as may deem fit and proper in its absolute discretion.

a. Newly listed shares, illiquid securities, Trade-to-Trade, Z group securities, Penny stocks SME Scrip's, Scrip's shortlisted by NSE/BSE in ASM (Additional Surveillance Measures) ,GSM (Graded surveillance Measures) or any other group of scrips that may be introduced by the exchange having high VaR margin, ELM and additional margin and where levying of additional surveillance deposit by the exchanges on said GSM/ASM scrips, trading in these scrip are subject to the high market risks and rate fluctuations.

b. Illiquid securities & Trade-to-Trade securities will have a daily price range and there are chances that these shares reach the upper DPR or Lower DPR during a trading day. Hence, the dealing in these securities as mentioned in part 1 & 2, will be subject to the permission from the RMS dept. and will be subject to the available credit balance and/or sufficient margin by the client. In few cases **Zanskar** may allow client on its own discretion to trade (buy/sell) in above group of scrips depending upon Client's profile and market condition only on sufficient available margin.

c. liquid Contracts and Bonds - Restricted Contracts-- We are restricting/ blocking certain Future and options contracts on trading platform to avoid Malpractices or erroneous trading. The Parameters on which we are restricting/ blocking such Contracts are as under:-

- Open interest value in the contract is less than 25 Lacs. For future contract $\text{Open interest} \times \text{Closing prices} < 25 \text{ lacs}$, in case of option open interest quantity $\times (\text{strike price} + \text{closing Premium price}) < 25 \text{ lacs}$.

Or

- In case of Option contracts, if strike price falls (+,-) 20 % of previous day closing price of that Particular scrip in cash market.

Or

- All contracts having expiry more than 6 months –

Any contract which falls under the above parameters will be not allowed for trading on trading Terminals

And

- Options trading will be allowed within the range of 5 % of Underlying for contracts with

Symbol of MIDCPNIFTY and FINNIFTY.

d. In case of Trading in BSEFO derivatives segment :-

Stocks :-

i. Current Month Contracts: Only current month contracts traded on the previous day are eligible.

ii. Open Interest (OI): The OI should exceed 50 lacs.

iii. Option Strike Price: Option strikes within 3% of the underlying price are permitted. iv. Maximum Position: Value not exceeding 10 lacs.

- For Margin Trading Funding (MTF) trade executed by client as per our policy and guidelines prescribed by SEBI and Exchange(s) via circular no CIR/MRD/DP/54/2017, NSE/COMP/48531, 20210609-35.
- Client requires MTF can submit MTF consent form to **Zanskar** to enable MTF trading facility in his/her trading account by agreeing all terms and conditions related to MTF trading facility. In Trading system client can execute trades by selecting product 'MTF' instead of 'CNC' if wish to executed trades under MTF facility, as well as clients can liquidate/sell his/her existing MTF Funding securities/stocks only via using "MTF" product at the time of order executing on trading platform. Further, the **Zanskar** may its own discretion to considering cash collaterals as margin for margin trading facility.
- **The Zanskar** at its own discretion may prohibit or block intraday trading in any scrip at any time. **Zanskar** may also demand higher margin considering the factors such as volatility, fluctuation, and circuit filters etc. in any given scrip.
- Clients registered with **Zanskar** but not provided POA/DDPI and/or demat accounts are not with the **Zanskar**, in such case(s) **Zanskar** shall be granting exposure limit for buying of securities only up to available clear funds balance in clients account. However, **Zanskar** at its own discretion, depending on client's profile, may provide exposure to clients based on required minimum applicable margin on the available collateral.
- RMS dept. of Zanskar may refuse to allow any trade in below mentioned group of securities on its absolute discretion, even if client have sufficient credit balance and/or margin available in his account.
- In continuation to various surveillance measures already implemented, SEBI and Exchanges, pursuant to discussions in joint surveillance meetings, have decided that along with the aforesaid measures there shall be additional Graded Surveillance Measures on securities with price not commensurate with financial health and fundamentals like Earnings, Book value, Fixed assets, Net-worth, P/E multiple, Market Capitalization etc.
- ASM / GSM will be handled with caution. The Zanskar reserves the right to restrict fresh purchases of these securities on our trading platforms without prior notice, at its sole discretion

NSE: <https://www.nseindia.com/reports/asm>

<https://www.nseindia.com/reports/gsm>

BSE: https://www.bseindia.com/static/markets/equity/EQReports/additional_surveillance_measure.aspx
https://www.bseindia.com/markets/equity/EQReports/graded_surveil_measure.aspx

3.3. Maintain minimum cash collaterals by Clients:

- As per the norms of the exchange, segregation & monitoring of collateral at client level (circular no SEBI/HO/MRD2_DCAP/CIR/2021/0598 dated July 20, 2021 and NCL/CMPT/51657, NCL/CMPT/51658 dated March 17, 2022, member is required to maintain and upload minimum 50% cash collateral for their clients towards their margin requirement. In accordance with the new requirement, each client is required to maintain sufficient cash collateral (at least 50% of total margin requirement) towards their margin requirement at all times in all segments.
- It is to be noted that while making funds pay-out to the client, minimum 50% cash collateral will be retained by us against the total margin requirement of the respective client and then only remaining funds shall be released.
- Further, Clients are required to pay interest charges on the shortfall of the Cash-collaterals required to be maintained and uploaded to the clearing corporation. There will be interest charges of 18.00% p.a (0.05% per day) levied on cash-collateral shortage on respective segment.

3.4. Collection and reporting Margin/MTM losses of client:

We shall consider the free and unencumbered consolidated balance across all segments and exchanges (Including commodities balances but excluding balances in the client's Margin Trading (MTF) account for the purpose of collection and reporting Margin/MTM losses of the client as per clarification of the exchange circular no NSE/INSP/41498 dated 03.07.2019 and NSE/INSP/45191 dated 31.07.2020 and NSE/INSP/46485 dated 27.11.2020. Further, for reporting of margin collection from client to the exchange, first preference would be given to NSEFO segment and thereafter NSE/BSECASH, NSECD, MCX and other segments. We may change the preference at any time in future as per the discretion of the management.

3.5. Short Margin Penalty:

In case client fails to provide other Margins (MTM Loss, Delivery Margin, Additional/other Margin etc.) then penalty as prescribed as per SEBI circular no. CIR/DNPD/7/2011 dated 10.08.2011 shall be levied from the client and same shall be debited to respective client's account. Additionally, as per NSE circular no NSE/INSP/64315 & BSE circular no 20241001-48 the penalty levied by clearing corporation on short/non-collection of upfront margins may be passed on to the client, in case of Cheque issued by client to the **Zanskar** is dishonoured and/or increase in margins on account of change in hedge position by client/expiry of some leg(s) of the hedge positions of the clients.

3.6. Liquidation of Client's Securities/Restrictions/Prohibition to take further position or closing / Liquidation of existing position

- As per the SEBI circular no CIR/HO/MIRSD/DOP/CIR/P/2019/75 dated 20.06.2019 on Handling of Client's

Securities **Zanskar Securities Private Limited** shall transfer the securities purchased by client to client's demat account within 1 working day of the pay-out in case of clear payment is received from the client.

- Further, as stated in SEBI circular SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2022/153 dated 11.11.2022 on Handling of Client's Securities by trading/clearing member. If any client purchase securities, the **Zanskar** shall transfer the securities to the client's demat account from the pool account of the **Zanskar** within 1 working day of the pay-out. In case of the client fulfils / paid its full funds obligation the securities are available as a free balance in the respective client's demat account. If client fails to make a payment in full then the **Zanskar** shall transfer the such unpaid securities to the respective client's demat account followed by creation of an auto-pledge (without any specific instruction/request from the client) with the
 - flag/reason "auto pledge for unpaid securities", in favour of a the **Zanskar** in separate demat account titled "Client unpaid securities pledgee account (CUSPA)".
 - In case of pay-out of securities directly to client demat account by clearing corporation as per guideline prescribed by SEBI via circular no SEBI/HO/MIRSD/MIRSD-PoD1/P/CIR/2024/75 dated June 05, 2024, the clearing corporation shall transfer the securities directly to the client demat account and **Zanskar** shall provide unpaid securities details to the respective clearing corporation for pledge securities in favour of a the **Zanskar** in separate demat account titled "Client unpaid securities pledgee account (CUSPA)".
 - If the client fulfils its funds obligation within 5 trading days after the pay-out **Zanskar** shall release the pledge securities so the unpaid pledge securities are available to the client as free balance. **Zanskar** shall release the pledge securities subject to ledger balance available at the time of pledge release process. If client shall transfer funds (clear dues) after securities pay-out /release process completed by **Zanskar** those pledge securities shall release on next working day. In case of the Non-payment of dues by client in specified time period, **Zanskar** shall dispose-off/liquidate such unpaid securities in the market within 5 trading days after the pay-out without any notice to the extent of debit balance of the client and/or as per prevailing Risk management policy of **Zanskar**. Further, the **Zanskar** shall invoke the pledge against the delivery obligation of the client and such securities shall be blocked for early pay-in in the client's demat account. However as a good practice we may send SMS to client for pending dues and reminder for making payment before disposing/liquidating the securities of the client. If any excess securities balance in unpaid pledge balance shall be released from pledge in the respective client's demat account.
 - **The Zanskar** may on its own discretion, transfer the unpaid securities of the client to demat account of the respective client having debit balance depending on the profile of the respective client.
 - In case client fails to meet its Pay-In or margin obligations or MTM or clearance of outstanding debit balance with **Zanskar** before permissible time limit (within 5 days from T-Day), the client shall not be allowed to take any fresh or further position until the full clearance of earlier dues, obligation, outstanding etc. Further, it would be the duty of the client to monitor his/her/its position with the **Zanskar** from time to time. In case of any delay or failure in meeting any obligation, margin requirement etc. from client side, the **Zanskar** shall close the existing/open position WITHOUT ANY FURTHER INTIMATION to the client; however as a good practice we send SMS to client for margin calls and reminder for making payment before disposal of the securities, open position of the client.
 - Please note, we may allow further exposure to client having negligible debit amount up to Rs. 500/- (may

be due to late payment charges, other charges or difference of last clearance) , this amount is such that may not be intentionally kept debit by the client and due to which client's trading should not get hampered.

- In the event of client not meeting margin obligations as applicable, the **Zanskar** may square off its outstanding positions and sell off collaterals, to the extent required, without prior written or oral notice or intimation to the client, to ensure that the open positions of the client is backed by sufficient margin. In case of MTM loss of client on open position reaching 70-80% of the available collateral value or at discretion of **Zanskar** depending the client's risk profile, client's open position shall be squared off by the RMS dept. manually/automatically at H.O. In case of client being granted exposure limit as a multiple of available margin/collateral value, the position taken for intraday is required to be cleared by the client at least 30 minutes prior to end of trading hours to the extent of the margin/collateral available, failing which the position of the client shall be cleared/squared off by the RMS dept. manually / automatically at H.O
- **Zanskar** , at its own discretion can ask to make payment before Pay- In or upfront before placing order.

3.7. Liquidation/Squaring-off of MTF Securities/Positions by Zanskar :

MTF Securities/Position may be liquidated / squared off immediately in case of any of the following situations/ conditions, without any further intimation:

- If the value of the Margin deposited by client with the **Zanskar** to purchase stocks under MTF (Funded stocks), falls below minimum of the margin requirement.
- If the Client has not transferred required funds and/or approved collateral to meet the MTM loss/margin shortages.
- In case of debit (dues) / margin shortfall still exist upon closing the position; collaterals pledged by client shall also be liquidated to recover the debits / margin shortfall.
- Failing to authenticate OTP for MTF stock pledging, his/her MTF pending purchase may square-off on T+1 day by giving message and/or Email on client's registered mobile number / Email ID.
- In case of funded position which was categorized as Group-1 at the time of purchase moves out of Group-1 category due to transferred in T2T segment, ASM/GSM category or any other reason specified by the exchanges.
- In case of suspension of the securities, **Zanskar** will initiate liquidation of such funded position with immediate effect from the date of notice of suspension so that the position is liquidated fully before the date of such suspension respectively.
- **Zanskar** may close the existing / partial position of a client if the margin cover falls below minimum prescribed margin limits as specified by SEBI / Exchange(s) / **Zanskar** guidelines.
- Value of collateral has fallen either due to fall in prices or removal of the stock from the approved collateral list by Exchange/**Zanskar** including due to corporate actions.
- The margin% on MTF stock has been increased by Exchange/Clearing Corporation and hence there is shortage of margin on client's open positions.
- All losses and financial charges on account of such liquidation/closing out shall be charged to and borne

by the client.

- MTF Funding allowed for the period of 90 days from date of purchase securities into the MTF facility. After completion of 90 days, your funded stocks/position shall be liquidated by **Zanskar**.
- In case of client's MTF ledger debit balance increased from total funded value of securities, **Zanskar** shall liquidate pledge securities of the client, if client fail to clear dues in his/her account.

3.8. Stock Expiry RMS Check:

TYPES	LONG	SHORT
Futures	Security Receivable	Security Deliverable
ITM Call	Security Receivable	Security Deliverable
ITM Put	Security Receivable	Security Deliverable

1. **Stock Options:**

a. **Intraday:**

- On monthly expiry, trading in intraday stock options is not allowed.

b. **CNC:**

- Clients having current month expiry contract positions should maintain 100% margin by 10 AM.
- If roll over is not done by the specified time, carry forward positions will be squared off by RMS team if the option is OTM but has a possibility of turning ITM.
- In case of low liquidity at lower prices, a limit order will be placed at the specified time.
- If a scrip is under a ban on the expiry day, then it cannot be rolled over and only square-off will be allowed.
- In case if delivery is marked, the client is expected to maintain the required balance in their account and any penalty charged will be passed on the client.
- In case of margin shortage, there be interest charged.
- In case of a short delivery, the client must maintain the position of underlying stocks in the specific quantity.
- Client can request for delivery but the margin and stock requirements must be maintained.
- In case of hedge position, netting off will be done and the client is liable to either deliver or take delivery of the balance position.
- In case of stock options buy position only the premium paid is required whereas in case of stock option short position the below margin is required.

c. **Margin Requirements:** Considering the expiry day as T, the margin requirements for both Intraday and CNC positions as follows:

- T – 4: 10% of Total Deliverable Margin
- T – 3: 25% of Total Deliverable Margin

- T – 2: 45% of Total Deliverable Margin
- T – 1: 75% of Total Deliverable Margin
- T : 100% of Total Deliverable Margin

2. Stock Futures:

a. Intraday:

- On monthly expiry, trading in intraday stock futures is allowed and square off will be done by 3:20PM.

b. CNC:

- New positions created will be squared off by 3:20PM.
- Clients having current month expiry contract positions should be rolled over or adequate margin must be maintained.
- If roll over is not done by the specified time, carry forward positions will be squared off by 3:20PM.
- If a scrip is under a ban on the expiry day, then it cannot be rolled over and only square-off will be allowed.
- In case if delivery is marked, the client is expected to maintain the required balance in their account and any penalty charged will be passed on the client.
- In case of margin shortage, there be interest charged.
- In case of a short delivery, the client must maintain the position of underlying stocks in the specific quantity.
- Client can request for delivery but the margin and stock requirements must be maintained.

c. **Margin Requirements:** Considering the expiry day as T, the margin requirements for both Intraday and CNC positions as follows:

- T – 4: 10% of Total Deliverable Margin
- T – 3: 25% of Total Deliverable Margin
- T – 2: 45% of Total Deliverable Margin
- T – 1: 75% of Total Deliverable Margin
- T : 100% of Total Deliverable Margin

By trading in physically settled contracts, the client acknowledges and accepts these risks and agrees to comply with exchange and broker policies. This policy may be changed at the discretion of the RMS team.

Circular: <https://archives.nseindia.com/content/circulars/CMPT43262.pdf>

Margin calculator: <https://www.nseindia.com/market-data/margin-calculator>

4. **Ban Scrip In Equity Derivative**

- Creation of Fresh position is not allowed in BAN Contract's in Equity Derivative. Hence all BAN Scrip's

contract's will be blocked everyday accordingly on trading system. The Zanskar 's Risk team has the right to liquidate any excess position in such scrip's without prior intimation. It is client's responsibility to ensure no excess position is created and or liquidation of position if any. Any penalty in this regard shall be paid by the client.

- Dealing in Restricted Scrips- In order to exercise additional due diligence while trading in these securities either on own account or on behalf of their clients:
 - Zanskar shall from time to time classify and publish on its website a list of securities which are restricted based on internal criteria.
 - Zanskar reserves the right to refuse execution of any transaction requests of the client on such restricted securities or to reduce the open market interests of the client in such securities/ contracts
 - Zanskar also reserves the right not to allow any trades or transactions in respect of certain securities or segments or orders/requests which may be below/above certain value/quantity as may be decided by Zanskar from time to time.

5. Unsolicited SMS

- The Securities identified by exchange in which unsolicited SMS are circulated has been kept suspended from further buying & selling.
- Further the square off will also be based on the extreme volatility in the market which may have severe impact on the client and the Zanskar . A prior intimation on the same may or may not be given and thus clients are requested to take care of their positions and MTM.

6. Default by Client

Since securities are accepted as margin, movement of price may lead to valuations of securities which are not enough to cover debit / margin obligations. In such scenario, securities shall be liquidated and client has to pay any remaining debit, failure to pay the same may lead to legal arbitration with clients. If debit is not cleared by client, then the Zanskar will continue to charge interest on debit amount and if debit is not cleared within timelines prescribed Zanskar reserves the right to file legal case to recover the debit amount

7. Voluntary freezing of the Online Trading account policy

- Clients who wish to voluntarily freeze their online trading accounts, can use below methods
- Procedure to Freeze Online Trading Account **Using the App:**
 - a. Log in to the Zanskar application (mobile/ web), go to the Accounts page, and click on the Profile Widget.
 - b. Select the "Temporary Account Freeze" option.
 - c. Follow the on-screen instructions.
 - d. Enter the OTP received via SMS and email for verification.
 - e. Upon entering the correct OTP, the account will be frozen.

Calling a Dedicated Support Line:

- a. Call ZANSKAR at the dedicated number on latest number mentioned on the website
- b. The customer support agent will verify the client's identity and may request additional information. verified, the agent will freeze the account.

Email from registered email ID to dedicated email ID: stoptrade@nubra.io

- Procedure to Unfreeze Online Trading Account
 - a. Clients can call the dedicated support line at and follow the agent's instructions. After necessary due diligence, the account will be unfrozen within approximately 30 minutes subject to necessary validations.
 - b. After the account has been unfrozen, the client can resume trading.
 - c. Clients will be allowed to trade through both online and offline modes, i.e. call and trade or through AP terminal.

- Important Points to Note:
 - It is advised that the client closes all his open positions before giving the request for freezing the account.
 - Client's account will be blocked, within 15 minutes of receiving the freeze request.
 - Confirmation of the freeze of the account will be sent via email and SMS, including the process to unfreeze the account.
 - All pending orders, whether placed online or offline by the client, will be cancelled by the system and trading access will be blocked.
 - Clients will receive details of any open positions along with contract expiry information within an hour of freezing the account.
 - Upon freezing, the client will be logged out of the app but can log in for exploratory purposes without the ability to place trades.

 - New SIPs will not be executed while the account is frozen.
 - Fund addition and withdrawal will be allowed, but profile modifications will not be permitted.
 - It is recommended to change the login PIN immediately after freezing the account. This can be done by navigating to Accounts → Settings → Change PIN.
 - Clients with open positions can call on latest number mentioned on the website. to close them.
 - To unfreeze the account, clients can call at on latest number mentioned on the website.
 - In case of margin shortage, client position will be auto squared off to the extent of margin shortage.
 - If a client's account has a negative balance for T+5 days, their investments will be sold to cover the amount owed.
 - Any open position under Intraday product will be auto squared off by the system as per the Intraday product policy

8. Intimation to client:

Client needs to be aware about open positions and purchases. The **Zanskar** is under no legal obligation to send any formal communication. However, the **Zanskar** would take extra efforts generally to inform client about the

Risk and actions. The intimation would generally be given through website login, phone calls, SMS, Email etc. subject to correctness and availability of the information in the software.

No client will be allowed to go beyond this exposure limits set in a single scrip / instrument

Cash	
Turnover in Cr. (<u>average of last 30 trading days</u>)	MAX EXPO (in Cr)
1 to 50	2
50 to 250	5
>250	10

FUTIDX	
Expiry	MAX EXPO in Cr
Current Month	90
Next Month	60
Far Month	30

OPTIDX	
Turnover in cr	MAX EXPO in Cr
< 10CR	15
10 to 100	30
100 to 500	60
Above 500	90

FUTSTK	
Turnover in cr	MAX EXPO in Cr
< 50CR	10
50 to 100	15
100 to 300	20
> 300	30

OPTSTK	
Turnover in cr	MAX EXPO in Cr
< 1	2
1 to 200	6
>200	20

9. Cautions towards unsolicited messages:

Unsolicited messages are being sent by unknown sources to induce investment or sale of the stock of certain listed companies, indicating target prices by unregistered or unauthorized entities.

We advise our clients to remain cautious on any unsolicited messages being received by them through SMSs or other ways and refrain to trade/deal in any such stocks based on such SMSs.

Investors are cautioned against SMS tips to buy certain scrips suggesting increase in their market price. We advise client not to blindly follow these tips and do thorough analysis before investing.

Exchange(s) disseminates list of securities in which SMSs is found to be circulated. We always insist client's to go through the list on continuous basis.

In case if client trades in such scrips and exchange levies any penalty and/or holds pay-out, it will be the complete responsibility of the client.

10. Abnormal/Non- genuine transactions:

As a diligent market participant, every client is expected to exercise adequate due diligence before executing any transactions on the Exchange platform. Stock Exchanges, vide their circulars no. BSE: 20181213-31 and NSE: NSE/INVG/39647, both dated December 13, 2018, have advised clients to refrain from entering any abnormal/non- genuine transactions (i.e. transactions made with an objective of transferring profit/loss between the concerned clients/entities or creation of artificial volume in securities/contracts etc.).

Further, in case of suspicion of any abnormal trading pattern in the client account, the Exchange/**Zanskar** reserves the right to block an amount equivalent to the trades in those securities and the same would be released only after receipt of a rationale on the said trades from the client and subject to completion of Zanskar 's internal due diligence. Additionally, a penalty of 100% of traded value/profit made/loss incurred as a result of such trades may also be levied. Notwithstanding the same, the **Company** may initiate appropriate disciplinary action against the client which may include termination of relation as a client.

In view of the aforesaid, we advise clients to exercise utmost caution and due diligence before executing any such transactions through the **Company**.

The Company/Exchange reserves the right to decide whether a trade or trades is/are abnormal/non-genuine and the decision would be final and binding on you.

11. Precautionary Measures Being Adopted during Heavy Market Falls:

As a part of our risk management system, the **Zanskar** has inducted our separate team who is monitoring the exposures of clients/ Authorized Persons on real-time basis. During market fall, the **Zanskar** observe the position of respective client as well as his credit balance available with us, securities lying with us etc. and depending upon the same, the **Zanskar** allow them to transact or create the position or to extend / subtract their position. At the same time, the **Zanskar** has to consider respective client's trade history/experience, his/her financial capacity and/or credit worthiness and referrals. In case, there is debit balance, **Zanskar** request client to provide sufficient margin / securities / funds to carry out his/her request for fresh buying or to create fresh position. During the

market fall, the **Zanskar** may curtail client's exposure limit to minimal compared to normal market condition. In exceptional cases **The Zanskar** may only allow client to purchase shares in extent to available credit balance of the client.

12. Disclosure:

In order to protect its interest, **Zanskar Securities Private Limited** reserves its right to alter / amend this RMS policy in its absolute discretion from time to time considering its prevalent RMS policy and market conditions or as per the regulatory requirements without any intimation to clients. However, clients are being advised to refer and actually understand the KYC requirements, prevalent RMS policy and such other terms and conditions before entering into any transactions with Zanskar.

As per above policy is mention in Zanskar Securities Pvt Ltd., here I read all the points and update the same also in policy 1 portion is MTF which is not applicable to us at presently because we do not allow any kind of debit to client. And also may be we are not registered in MTF (Margin Trading Funding)