

RSB-DISCLAIMER

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PRIVACY POLICY

We are committed to protecting your privacy. We will only use the information that we collect about you lawfully.

The type of information we will collect about you includes:

- Your Name
- Address
- Phone Number
- E-Mail Address

We will never collect sensitive information about you without your explicit consent. The information we hold will be accurate and up to date. You can check the information that we hold about you by e-mailing us. If you find any inaccuracies we will delete or correct it promptly. The personal information which we hold will be held securely in accordance with our internal security policy and the law. We may use technology to track the patterns of behavior of visitors to our site. This can include using a “cookie” which would be stored on your browser. You can usually modify your browser to prevent this happening. The information collected in this way can be used to identify you unless you modify your browser settings. If you have any questions/comments about privacy, you should contact us.

CLIENT CODE MODIFICATION POLICY

[Reference : SEBI Circular No. SEBI /HO/CDMRD/DMP/CIR/P/2016/43
29.03.2016] Preamble –Rayalseema Bullion & Commtrade Pvt. Ltd. is a
Commodity Broker member of MCX . As such, it carries out trading of its clients
in respective exchangethrough various branch offices including offices of its sub-
brokers / franchisees /authorised person etc.

While carrying out its functions as a Broker, it might happen sometimes that due
to certain reasons, the client codes might not have been entered correctly at the
time of either order entry or need to be changed once converted into trades so
that proper and correct effect of those vary transactions can be given.

However, SEBI and Exchanges have issued various circulars in this regard.
Accordingly, with a view to minimise the errors being committed in this regard,
certain objective criteria for identifying genuine errors for client code
modification of non-institutional trades and guidelines for the implementation of
the requirement of those circulars are given below.

1. To rectify genuine error in entry of client code at the time of placing / modifying
the related order, Permission of Head – RMS or such other higher authority

designated by the management must be obtained prior to changing the client codes.

2. Such permission shall be given to change client codes of non-institutional clients only for the following criteria:

Error due to communication and/or Punching / Typing error – Such that the original client code / name and the modified client code/name are similar to each other. [For e.g. if the code entered by punching D001 instead of B001 due to communication error] Modification within relatives (“Relative” for this purpose would mean “relative” as defined under the Companies Act, 2013)

3. In case of shifting of any trade (Institutional or non-institutional trades) not accepted by any client, such trades MUST be first shifted to designated “ERROR” account and relevant position subsequently liquidated / closed out in the market. Once, the trades have been transferred to such Error Account, the same shall NOT be shifted to some other client code.

4. UCC for such Errors Account MUST be uploaded to respective Exchange. Accordingly, KYC Department is directed to take all necessary steps to upload the same immediately and to report about successful uploading of the same (with documentary evidences, if any) to the Compliance & RMS Team.

5. Further, the designated employee(s) MUST inform the respective Exchange (as per the mechanism established by them in this regard) on a daily basis by end of day, the reasons for modification of client codes of non-institutional trades based on the aforesaid objective criteria. Further, he/she MUST preserve all related documentary records in this regard so as to assist the Compliance Team at the time of Inspection in this regard.

6. All related employees are STRICTLY warned not to modify any client code in the back-office system or after the close of the modification window provided by the Exchange(s). 7. All concerned or deemed to be concerned employees are strictly advised to comply with this guideline or policy in true letter and spirit.

Note : The aforesaid policy is approved by the Board of Directors of the Company i.e. Rayalseema Bullion & Commtrade Pvt. Ltd. as per its meeting held on 01 April, 2017.

DORMANT ACCOUNTS POLICY

Definition of Dormant/Inactive Account

In case of trading account if a period of 6 calendar months (for Rayalseema Bullion & Commtrade Pvt.Ltd herein after known as RSBC) elapses from the

date of last transaction, such account will be deemed as Dormant/Inactive Account.

Transaction in Dormant/Inactive Trading Account

The dormant/inactive account identified, based on the above criteria shall be flagged as such in RSBC's record. RSBC under the guidelines of FMC reserves the right to freeze/deactivate such account and shall not allow carrying-on of any long open position in such account.

Treatment of Credit balance of Funds/Securities in Dormant/Inactive Account

If there is any credit balance of funds/securities in dormant/inactive account, it shall be returned to the client intimating them that their account has been frozen/deactivated. In case no contact could be established with the client, such funds will be retained till such time RSBC hears from the client or their representative. Trading in such account is suspended.

Debit Transaction in Dormant Account

The accounts wherein no debit transaction has taken place for a continuous period of 6 calendar months shall be flagged as dormant/inactive accounts.

Additional due diligence would be observed over and above the normal verification procedure while processing any debit transactions in such accounts.

The above stated policy may vary depending on various rules, regulations and bye laws as may be prescribed by FMC, exchanges or any other authority and also as per the internal policy of RSBC from time to time. This policy for dormant accounts is over and above the transaction monitoring in Dormant Account as per Monitoring in Dormant Account according to Anti-Money Laundering Policy of the Company.

Reactivation of Dormant/Inactive Account

The client is required to submit a request for re-activation stating that no material change has taken place in respect of the details provided initially at the time of account opening along with the relevant documents as may be mandatorily required in this regard. If there is any material change in the details of account holder, a fresh KYC Form will have to be duly filled.

The dormant/inactive account will be reactivated after receiving of any written intimation registered letter/email or verbal intimation i.e. recorded telephonic conversation. Such an account will be reactivated only after undertaking proper due diligence process and fulfillment of such conditions as may be deemed fit.

RISK MANAGEMENT POLICY

PREAMBL

RAYALSEEMA BULLION AND COMMTRADE PVT LTD is a Trading and Clearing member of Multi Commodity Exchange of India (MCX) is regulated by the FMC through their respective byelaws, rules and regulations.

In the course of conducting its broking business, RAYALSEEMA BULLION AND COMMTRADE PVT LTD is exposed to variety of risks including market, credit, liquidity, operational and other risk that are material and require comprehensive controls and ongoing oversight.

The risk management framework of RAYALSEEMA BULLION AND COMMTRADE PVT LTD for its Commodity Futures broking business is based upon the different client segments, applicable settlement mechanism of FMC/Stock Exchange regulations. We set out below the principles of our risk management framework:

RISK MANAGEMENT POLICY

- Every Client Is Registered With Us After Due Completion Of Designated KYC And Satisfactory Identification. Detailed

Information Of Every Client Is Recorded Before Commencing Transaction For Any New Client.

- Initial Margin Is Collected From The Respective Client And Accordingly Trading Limit Is Provided To Each Client.
- Exposure / Limits Are Set For Each Respective Client On The Basis Of Deposits / Credits Available And Are Being Monitored On Real Time Basis
- Real Time Client-Wise Risk Management Is Done, Along With Control On Margin & MTM Obligations.
- Trading In Tender Period Has Been Restricted As A Precautionary Measure Against Spot Delivery Settlement Transactions, Against Strict Surveillance.
- Intraday Positions Will Be Squared Off When The MTM Reaches 80% Of The Cleared Ledger Balance

POLICY FOR DORMANT CLIENTS

Any dormant client (Inactive for Trading for 6 Months) will be re-activated by confirming his/her identity proof by branch head/in-charge and/or head office staff. It will be mandatory to provide proper identity proof in original to re-activate any dormant client prior to trading.

MARGINS

Minimum Margin required at the time of account opening is Rs 25000.00, adequate margin required for Carry forward positions on T-1 basis. Required Span Margin would be calculated and blocked on the system of RMS on the Real-time basis based on the Order placed by the client.

EXPOSURE

- Exposure Shall Be Based On Ledger Balance Availability Of Client's Trading Account And It Would Be "4X" By Default.
- No Adhoc Margin Shall Be Provided.

SQUARE-OFF

Intra Day:

- All Outstanding Intraday Position Shall Be Squared Off Daily At 11.15 Pm At Market Rate.
- All Pending Orders Shall Be Cancelled Prior To Intraday Square Off Execution.
- For All Orders Not Executed After Running The 1st Intraday Square Off @ 11.15pm For Whatsoever Reason Further 2nd Intraday Square Off Shall Be Executed @ 11.30pm A Market Rate As Defined Above.

MTM

- Margin Erosion (MTM) Alert Message Will Be Sent To The Relevant Terminal Of Mapped Client From 40% And On Every 10% Incremental Level.
- 80% Alert For Margin Erosion (M2M) Informing Client About Client In Square-Off Mode Only.

ACTION LEVELS:

- On 75% Margin Erosion (M2M), Client Will Be Put In Square-Off Mode And Client Shall Not Be Able To Take Any Further New Position.
- On 80% Margin Erosion (M2M + Brokerage), M2M Square Off Will Be Executed From HO-RMS Department At Market Rate
- After The Execution Of Sq-Off, The Client Would Not Be Allowed To Place An Order Until He Gets Approval From The Top Level Authorities Of MCL.

PMLA POLICY - Attached Document

PREP FUNDED POLICY - Attached Document