

RISK MANAGEMENT POLICY

Analyzing exposure to risk and determining on handling of the same forms the basis of our Risk Management Policy.

- Limits will be set automatically whilst taking into consideration the client's ledger position, shares lying with us in our margin account (after due haircut). As a norm we require a minimum margin of 20% in cash segment. The under mentioned T&Cs are applicable to set the client limit.
- We have margin based automated RMS system. Total deposits of the clients are uploaded in the System and client may take exposure on the basis of margin applicable for respective security as Per VAR based margining system of the stock exchange.
- If **margin used** is more than **cash margin available** then gentle reminder will be given to the client for maintaining sufficient balance but if **span margin requirement** is more than **cash margin available**, then position will be squared off immediately from RMS.
- Reminder to **Squared off** of the shortfall position will be flashed on Dealing Terminal. Company will not be liable if reminder message in not been displayed properly on dealing terminal due to technical problem.
- In Equity Future & Option segment, system will calculate and block Initial margin (as per exchange).
- As per our RMS policy any single order valuation should not exceed Rs. 20,00,000/- (Rupees Twenty Lacs Only) irrespective of equity, equity derivative and currency derivative segment.
- The Client shall be solely responsible for squaring off the Margin Intraday Positions (MIS) during the day *10 minutes before the market closure. In case the client fails to square off the position (Cash market and F & O), then, on a Best Effort Basis, Achiievers Equities Limited / Achiievers Commercial Pvt. Ltd. (AEL/ACPL) may square-off all the open positions (including Cash market and F & O - long or short) under MIS. However, If the Open positions under MIS are not squared off during the day for any reasons and are carried over for the next trading day, then those trades shall be treated as NRML/ CNC trade as the case may be and Client shall be responsible and liable for the trading obligations as any other normal trade and shall pay the requisite margin and or the purchase consideration as the case may be. Client shall ensure and take all steps to monitor such trades and comply with its obligations for such trades.

*New timing is effective from 7th July, 2021.

- The Client shall be solely responsible for squaring off the Max Multiplier (CO) during the day before 3.10 p.m. In case the client fails to square off the position (Cash market and F & O), then, on a Best Effort Basis, Achievers Equities Limited / Achievers Commercial Pvt. Ltd. (AEL/ACPL) may square-off all the open positions (including Cash market and F & O - long or short) under CO. However, If the Open positions under CO are not squared off during the day for any reasons and are carried over for the next trading day, then those trades shall be treated as NRML/ CNC trade as the case may be and Client shall be responsible and liable for the trading obligations as any other normal trade and shall pay the requisite margin and or the purchase consideration as the case may be. Client shall ensure and take all steps to monitor such trades and comply with its obligations for such trades.

Equity Policy

- Execution of trade is not allowed for those instruments which are in Ban Period.
- For Trade to Trade (T2T), MIS not allowed (System will allow only CNC purchase & sell on the basis of available share holdings).
- If any Security moves 16% upside or downside from market price other than shares traded in Future, then MIS will be blocked from Admin for that particular stock & all the existing open positions will be squared off at that point for that particular day.
- Cash market Intraday limit (MIS order) will be given to #*8 times depending on the availability of the margin.
- Cash market Delivery limit (NRML limit) will be #*8 times depending on the availability of the margin.

*8 times Exposure in Delivery will be only on approved stocks.

Clients who will avail up to 8 times exposure in cash segment for delivery against their demat holding balance, those clients shares lying in demat account will be deposited as collateral by the clients towards margin and transferred to client margin account subject to maximum of 2 times of ledger debit.

Illustration

Demat holding	Ledger balance	Limit given to client (50% of A+B)	Exposure taken by client	Ledger debit	Share payout valuation	Shares to be maintained in margin account (Maxm 2 times of ledger debit)	Shares transferred to margin from demat as per availability	Total share valuation in client margin account (F+H)
200000	0	100000	8	800000	800000	1600000	200000	10,00,000
600000	0	300000	2	600000	600000	1200000	600000	12,00,000
800000	0	400000	1	400000	400000	800000	400000	8,00,000
0	200000	200000	8	140000 0	1600000	2800000	0	16,00,000
1000000	200000	700000	5	330000 0	3500000	6600000	1000000	45,00,000

Once the debit is cleared shares will be transferred back to client DP account. To avoid to and fro of shares and additional DP charges, Investor can avail **Shares as Margin Facility**.

Click here for share as margin format: <https://blog.achieversequitiesltd.com/wp-content/uploads/2019/05/Share-as-Margin-.pdf>.

*DP charges will be applicable for deposit of collateral and transfer of shares from client demat to client margin account.

*No Delivery exposure in Cash segment w.e.f. 1st Aug, 2019, i.e. in cash segment, exposure will be 1 time as per actual cash ledger balance or cash + 50 % demat balance from 1st of Aug, 2019. However the Cash intraday & Derivative segment exposure will remain the same, as it is.* This is with reference to SEBI circular no CIR/HO/MIRSD/DOP/CIR/P/2019/75 dated June 20, 2019.

**** Changes in existing Policy w.e.f Oct 16, 2020**

- For selling of demat holding stocks (CNC sell), no upfront initial margin (VAR +ELM) required. Clients can sell demat holding without cash or collateral margin.
- For BTST sell, no upfront margin is required. BTST sell will be at client's own risk. If any short delivery occurs & auction happens, then client has to bear the profit /loss due to auction.

*** Changes in existing Policy w.e.f Sep 01, 2020**

- Pledge benefit only for NSE approved stocks.
- Collateral value will be 50% of the pledged value
- Collateral value for exposure as follows :
 - A) Intraday BUY first leg
 - B) Intraday SELL first leg
 - C) CNC sell
 - D) Future intraday & carry
 - E) Option writing
 - F) Option BUY not allowed
 - G) CNC BUY not allowed
- Intraday / MIS exposure in equity cash segment is 5 times i.e 20% of upfront margin
- For demat stock sell (CNC sell) – Upfront VAR + ELM margin mandatory

Addendum : (Forming Part and Parcel of the Existing RMS Policy) effective 01.10.2019

As Prescribed in the SEBI Circular dated 20th June 2019 the following changes have been incorporated in the existing Policy in line with the SEBI Circular approved by the Board of directors:-

In order to meet the requirements of the said Circular, following Policy has been adopted w.e.f 01st October 2019. The said Policy & Procedure has been defined keeping in mind the Market Scenario/Clients Paying ability and other factors which may affect the Risk management of the Company. The Option as defined in the RMS Policy will not be Static and instead will be applied on case to case basis at the sole discretion of the Management. No Client has the right to raise a dispute with regard to the Option adopted by the company with respect to their trades on the exchange and is completely under the sole discretion of the Management.

Policy/Procedure

Option A: Shares Purchased will be transferred to their respective demat account on the 5th trading day from the pay-out from Client unpaid securities account (CUSA) even when there is a debit balance in the ledger and Delay Payment Charge will be applicable @ 24% P.a till the Payments are cleared. No further exposure will be provided to such clients if there Ledger is in debit till the funds are cleared. Funds received by EFT mode and credited to our bank account and the ledger of the clients is into credit only then the further exposure will be granted. No exposure will be granted on the basis of an account payee cheque Provided/deposited by the clients till the funds are realised and credited to our account. This is equally applicable in case of Physical settlement made under derivative trading. Clients falling under this category and whose shares have been transferred to their demat account and the ledger is in debit then as per the adopted Policy an option shall be given to such clients to either clear the debit balance by paying an equivalent amount/ or more and shall also be allowed to clear the debit balance by selling an equivalent Qty of shares if they wish to sell off the securities kept in "Client collateral account" and or shares in "Collateral account" which has been transferred to CM/CC to adjust the debit balance.

Option B: shares Purchased will not be transferred to their demat account and instead shall be kept in a separate account specified by the above mentioned circular " Client Unpaid securities account" till the 5th trading day from the pay out if the ledger of the client is in debit. If the Clear Funds are not received from these clients within 5th Trading day from the pay-out then such securities kept in the CUSA account shall be disposed off in the market on the 5th trading day from the pay-out /or earlier if it seems reasonable and the relevant Profit/Loss shall be accordingly posted in the client Ledger. Delay Payment Charge will be applicable @ 24% and shall be charged to their ledger balances since the beginning of the debit balance(from T+2 date) till the clear funds are received either by way of disposing off the securities in the market/ and or funds received from these clients. This is equally applicable in case of Physical settlement made under derivative trading. Clients falling under this category shall be given an Option to sell the securities lying in the "Client collateral account" and or shares in "Collateral account" which has been transferred to CC/CM to adjust the debit balance within 5th Trading days from the Pay out without diluting the shares kept in the CUSA account. Once the Client Ledger is in credit either by paying an equivalent amount of debit balance or more within 5th trading day from the pay out or by selling the securities in Client collateral account" and or shares in "Collateral account" which has been transferred to CC/CM, then the shares in CUSA account shall be transferred to the demat account of the respective client within 24 hours.

Further in case of Partial payment by these clients and still the ledger is in debit the shares/securities in CUSA account will be sold in proportion of the debit balance after considering any credit available in the ledger. The balance shares if any shall be transferred to the clients demat account on the 5th Trading day from the Pay-out. In case Client Specifically request for transfer of Shares/Securities on or before the 5th Trading day from the pay out where the amount is paid then such securities shall be transferred to the clients demat account and only the balance will be sold to recover the debit balance. Profit/loss arising out of such transaction shall be accordingly debited /credited in the Clients Ledger.

General Provisions:-

- 1) No Pre order Confirmation will be taken from clients when the Shares/Securities are sold from CUSA account to realise the debit balance, however necessary margin calls/debit balance will be intimated/informed to ensure that the client is aware of the scenario under which such shares/securities have been disposed off in the market within 5th Trading day of from the pay-out.
- 2) If any Shares/Securities are unable to be sold in the market within 5th trading day from the pay-out due to reasons such as Lower Circuit/Court/regulatory order/GSM and or such shares/Securities have been freezeed then the shares will be kept in CUSA account till the time such shares/Securities have been enabled to be sold off in the market and any charges levied by the relevant depository on the same will be required to be reversed by making an application to the relevant depository after citing the necessary reasons for the same. The Charges levied by Depository shall not be recovered from the client however the Delay Payment Charge @24% will continue to be applicable till the ledger is in debit.
- 3) Shares/securities kept in CUSA account shall be considered towards meeting the margin obligation of the exchange after adjusting the debit balance. Only Free/Unencumbered balance available thereafter shall be considered while reporting to exchange on the margin requirement of the respective client. The Balances if any (credit balance) lying in the Client ledger w.r.t MTF Facility shall not be adjusted while considering the margin reporting requirement of CUSA account shares. Shares/Securities Purchased under MTF facility will not be eligible to be used as margin for that client in any other segment as the same are not free.
- 4) Running account authorisation provided by the client shall be ensured for settlement of funds as consented by the client within 30/90 days after retaining the amount required to meet the margin obligation and in compliance of the Circular **NSE circular NSE/INSP/36889 dated 02-Feb-2018.**
 Further all the shares/Securities lying in the “Client Collateral account” and or Collateral account shall also be required to settle once in 30/90 days after retaining the amount required to meet the margin obligation and in compliance of the Circular **NSE circular NSE/INSP/36889 dated 02-Feb-2018.**
- 5) Shares/Securities Lying in the CUSA account and as per the Policy if the same is required to be disposed off then client will be given an option to either inform us about the shares/securities that can be sold from the “Client Collateral account” or “Collateral account” if any shares are available in these accounts. In the absence of any

information from the client the shares shall be disposed following FIFO (First in First out) method. No Pre order confirmation will be required for selling the same.

- 6) Clients trading in the derivative segment of the exchange shall now be required to transfer the shares/securities to the new Demat account named/tagged as “Client Collateral account”. Accordingly clients who have executed a POA in favour of “Achiivers Equities Ltd” then such required qty of shares/securities to either meet the margin obligation/Pay in obligation shall be transferred to “Client Collateral account” and or Pool Account accordingly. Further if required the shares/Securities lying with us in Client Collateral Account be transferred to Clearing corporation/Clearing member then such shares of the required qty shall be transferred to Collateral account client wise and will be onward transferred to CC/CM. In no case shares/securities of one client be used for providing exposure to other clients/own trades. Vice versa Process will be followed for receiving back the securities/Shares transferred to CM/CC. whenever required by the client and upon specific request for transfer of Securities/Shares to the demat account of the client the same shall be undertaken within 24 hrs of the request made by the Client. Settlement of the Running accounts for Funds/Securities will be governed by NSE circular **NSE/INSP/36889 dated 02-Feb-2018**.
- 7) The clients whose Ledger is in debit and upon reaching the 5th Trading day from the date of Pay Out when the shares in CUSA will be required to be disposed off/ or as per our Policy of Liquidating the Scrips if the same is being liquidated from Client Collateral account/Collateral account then the BUY in the same scrip will not be allowed on the selling day. Further as required by the SEBI Circular **SEBI/HO/MIRSD/MIRSD2/CIR/P/2016/95 dated 26-Sep-2016** shall be diligently followed for providing the further exposure if the ledger is in debit till the clear funds are received.
- 8) In case of any client who has traded in the Securities where Inter depository facility is not available then a request will be made to client to open a demat account with the respective depository and in case the client does not wish to open a new account then such shares/securities will be transferred to “Client collateral account”. The same will be considered towards meeting the margin obligation requirement of the respective client. Securities/shares under this category will not be eligible to be settled as per running account authorisation. Same will be kept in “Client collateral account” till the time such shares/securities are sold by the client in the market.
- 9) No Direct pay out facility (from NSE clearing Ltd to client) shall be offered to any of the clients even when the Ledger is in credit.
- 10) In case of non-payment, securities lying in “Client unpaid securities account (CUSA)” shall be disposed -off within 5 trading days from the Pay-out date.

However, if client wish to sell off shares from Client collateral /collateral account /POA demat account/CUSA to clear the debit, he/she can sell/give instruction to sell till 3rd day after the pay-out date.

Illustration:

Day	Day to clear debit as per client wish	Shares to sell
Trade day - Monday (T)	Till 3 rd day from pay-out i.e next Monday ** Considering no trading holiday in between.	From Any of the account - Client collateral /collateral account /POA demat account/CUSA

If 3rd trading day crosses after the pay-out date & no fund will be received/shares sold by the client, then company will be bound to dispose –off the shares lying in CUSA account on 5th trading day after the pay-out date for the clearance of the debit amount. Here, company can consider NEFT/RTGS/IMPS/transfer cheque for debit clearance subject to clear fund shall be received latest by 12:30 p.m on the 5th trading day from the pay-out date.

However, company is having the right to sell client’s unpaid/partially paid securities/collaterals any time within T+ 5 day from pay-out date if required to meet margin obligation or to cover the risk position.

- 11) Delay Payment Charge **reversal facility shall not be available to clients except under extreme Circumstances and on the specific request** of the client only at the Sole discretion of the management.
- 12) In case of a client **whose shares have been transferred to the demat account of the client even when there was a debit balance** in the ledger, then under such scenarios in order to realise the debit balance, the shares can be sold in the market, using POA Facility the delivery of the same will be done. Further in case where the DI Slip has been received by the DP department for execution of the same and the ledger is in debit, the Slip will be liable to be rejected on the ground of debit balance in the ledger. Therefore in order to have a smooth processing of the Delivery Instruction, the clients will have to clear the debit balance in the Ledger.

6. Exposure will be 3 times for Future segment Intraday trading & 1 time for Carry forward.
7. Exposure will be 1 time for Options Intraday or Carry forward.
8. If MTM loss exceeds 70%, the same day position will be squared off.
9. Client can avail the “Payment Gateway System” of NOW terminal for Pay in of Funds Currently we have a tie up with AXIS & ICICI Bank, we are in the process to activate it with HDFC Bank.

**** Fifty Seven (57) banks payment gateway system has been added with NOW EXE /Web based terminal from July, 2018.**

10. The exchange delisted scrips will not be visible in trading system. One can check it in their respective DP account.
11. Auto square off in Intraday should be done on daily basis 15 minutes before market closing.
12. Equity Derivative clients can initiate position in F&O segment on the basis of SPAN margin only which was previously calculated on the basis of Initial margin (SPAN + EXPOSURE margin) from our end. SPAN must be strictly maintained by every client to keep their open position in NRML product.
13. To trade in NSE Non – approved stocks in CNC, client has to contact our Dealing Desk at 033- 66063021/3022/3023/3024 and give details of stock, quantity to be purchased, and wait for revert after necessary verification by RMS desk on the said script. Default Exposure in Non Approved stocks in CNC is 1 times.
14. Any request for Position conversion in Non-approved stocks will not be entertained after 3 p.m. Request can be placed over phone or email, but at-least 30 minutes before conversion. If mail or request is received after 3pm, position will be in square off Mode.
15. Revised exposures can be changed / withdrawn on unexpected instances of Market movement/ volatility as per Company's decision.
16. Stocks having circuit limit below 20% (FO segment stocks excluded) are blocked for MIS
17. MIS is not allowed for stocks having price level below Rs 10.

*Note : Equity Delivery limit 8 times w.e.f 1st Jan, 2017.

* Equity Cash Intraday limit 8 times w.e.f 1st Oct, 2018

Equity Intraday Exposure of Ten (10) Times:

- Client should maintain minimum 1 lac Cash balance in ledger to be eligible for this exposure. Share as margin will be additional with 1 lac cash balance.
- Till 30% loss of ledger balance i.e till 70000/- we will allow the client in 10 times exposure, client will get a call from RMS to provide margin equal to the deficit amount to remain above 1 lac again or he can sell shares of the deficit amount. Failing which code will be shifted to our default 5 times exposure category.
- 10 times intraday exposure will be given on selective scripts which are enabled for trading in Derivative segment. Not for all scripts.
- Positions will be squared off once the MtoM loss hits 50% of the ledger balance.

Minor changes in our RMS policy, for CNC (Delivery Trade) product.

Exposure will remain same

Elaborated below please find the minor changes which are incorporated in CNC product w.e.f. 15th of September 2014 and the difference between MIS (is only for Intraday) & CNC (is only for Delivery) product.

Products	Existing Exposure
NSE Cash Delivery (CNC)	3 times

Item		Product				
Sl.No.	Category	MIS (Intraday Trade)		CNC (Delivery Trade)		
		BUY	SELL	BUY	SELL	
					DP Sell	Intraday Sell
1	NSE Approved Stocks	Allowed 5times	Allowed	Allowed 3times	Allowed as per Actual DP Balance	Not Allowed
2	NSE Non-Approved Stocks	Allowed 5times	Allowed	Restricted Allowed 1 Times	Allowed as per Actual DP Balance	Not Allowed
3	NSE 5% & 10% Circuit Limit Stocks,T2T & Z Category	Not Allowed	Not Allowed	Restricted Allowed 1 Times	Allowed as per Actual DP Balance	Not Allowed
4	NSE illiquid Stocks	Not Allowed	Not Allowed	Restricted Allowed 1 Times	Allowed as per Actual DP Balance	Not Allowed

Revised Exposure Policy as on 1st Jan. 2017

- 8 times Delivery Exposure is given only on Approved Stocks using product type “NRML”.

Explanation:

Date	Client Margin (cash)	Client Collateral	Exposure (8T)	Buying Limit	CNC Funding	Stock Value Down in %	Actual M2M in Rs	Net Liquidation Value (NLV) (% of Client's Own Margin Eroded due to M2M)	Available Client Margin (after M2M Loss adjustment)	Violation % / M2M Loss %
1-Dec-16	10000	0	8	80000	70000	0	0	80000	10000	
2-Dec-16	0	0	0	0	70000	2%	1600	78400	8400	-16%
3-Dec-16	0	0	0	0	70000	1.5%	1176	77224	7224	-28%
4-Dec-16	0	0	0	0	70000	1%	772	76452	6452	-35%

- 1 times Exposure is given only on NSE NON-Approved Stocks, 5% & 10% Circuit and Illiquid Stocks.
- If any client has traded in Non-approved stocks in Intraday (MIS) product and later he/she wants to convert position into Delivery (CNC) product, then he/she has to contact our Dealing desk for conversion by 3pm.
- Any request for Position conversion in Non-approved stocks will not be entertained after 3 p.m.
- Request can be placed over phone or email, but at-least 30 minutes before conversion. If mail or request is received after 3pm, position will be in square off Mode.
- Revised exposures can be changed / withdrawn on unexpected instances of Market movement as per Company's decision.

Additional/Changes:

- Intraday in CNC product will not be allowed.
- If any client has bought fresh position in CNC product and he/she want to Square off his position in CNC on the same day, then he/she has to convert his position into MIS by 3.15pm. to Square Off.
- To Square off NSE NON-Approved Stocks, 5% & 10% Circuit Limit and Illiquid Stocks in CNC(Delivery Trade), client has to contact our dealing desk at 033-66063021/22/23/24 to unblock the said share so that it can be converted to MIS product by latest 3:15pm

Market wide Client Level Position Limits on Single Stock for Illiquid,B,Z & T Category are as follows :

As per our RMS policy we have Client Level Position Limits for single stock for illiquid,B,Z and T category stocks for the day

The open position (Buy or Sell) for each client, in any single stock under illiquid,B,Z and T category should not exceed 1% of the free float market capitalisation (in terms of number of shares)

Or

5% of the total traded quantity in terms of number of shares in the same stock whichever is lower.

Scrip wise Exposure limits

Cash Segment

To keep in mind the surveillance measures and also to stop unusual activities in illiquid stocks, scrip wise limits will be set on the basis of following parameters at Achiivers Equities Ltd level

Scrip Group	Available Buying Limit	Available Selling Limit
A Group	Unlimited Limit	Unlimited Limit
All scrips where F & O trades are allowed	Unlimited Limit	Unlimited Limit
B+S+T+ST	Avg. Volume \geq 50001 - Unlimited	Unlimited Limit
	Avg. Volume $<$ 50000 -30% of Average Market Volume of Last 10 Days	Unlimited Limit
	Avg. Volume = $<$ 1000 -No Buying Limit	Unlimited Limit
Z Group	Zero Buying Limit	There is no restriction on Quantity. However there is a limit on value of sale transaction which is Rs. 24 lacs Per Scrip at Achiivers Equities Ltd level (As per the Exchange Norms)

a. Avg. Volume signifies total of average traded quantity of both the exchange for previous 10 days.

b. No trades will be allowed in physical scrip.

c. Available buying limit are subject to Clear Margin Available on clients account and Selling limit are subject to available of sufficient Demat balance with Achiivers Equities Ltd

F & O Segment

To bring the control on risk related to trading in illiquid securities in F & O segment we have decided following parameters:

Parameter Mode

Parameter	Mode
Scrip which has open interest and also volume on previous day	Open
Scrip (only future) which has open interest but no volume on previous day	Open
Scrip (Other than future) which has open interest but has no volume on	Square off mode
Scrip which has no open interest but has a volume on previous day	Square off mode
Scrip does not have open interest and also no volume on previous day	Square off mode
Far month Future stock and Option Contract i.e. 3rd month onwards	Square off mode

Revised on Date : 15.09.2014

Place : Kolkata

Settlement Obligation in Options

22. 1. Brokerage: Any Transaction clients enter into will attract brokerage. Brokerage is debited to client account at the end of the day.
 2. Premium payable or Receivable
 3. Profit on Exercise
 4. Loss on assignment
23. Obligation amount will be debited or credited in client ledger account as per detail mention below.
24. Assuming clients place a transaction on day T, Options obligation will be settled as per the following table.

Condition	Obligation Settlement
Option Premium Receivable	T+1
Option Premium Payable	T
Exercise Profit in case of Stock / Index	T+1
Assignment Loss in case of Stock / Index	T
Brokerage	T

22. On T day if clients have a payin and takes a fresh position for a particular trade date and also squared off their existing position for a different trade date (if payin or payout falls on the same date) in that case fresh Position taken against limit arising from the squaring of the existing position and client does not have sufficient free limit available in such cases the said position will be reported as short fall of Margin Collection from client as per regulator and exchange and penalty will be charged as per regulation implied by SEBI and exchanges.

Illustration:

1st of Jan 2013 Buy Nifty 6000 Call at 100
= Total Amount payable 50x100 =5000

2nd of Jan 2013 Sold Nifty 6000 Call at 120
= Total Amount receivable 50x120 =6000

(will be received on T+1 on 3rd of Jan 2013)

2nd Jan 2013 Buy Nifty 5900 Put at 100

= Total Amount payable 50x100 =5000

(will have to pay on T day itself or else it will be reported shortfall of margin collection)

Note: Above illustration is considered in case client has no other limits.

Shares as Margin

23. Cash and Shares are considered as Margin and accepted for taking futures, options and Intraday positions.

24. For Futures, Options & Margin positions, margin can be given in the following forms:

(a)Cash Margin

(b) Specified securities (by way of depositing securities to our Margin Account by availing “Shares and Margin” facility”).

For Futures & Options and Intraday , the limit granted is a sum of (a) & (b) and the margin is blocked on the individual positions on the overall basis and not in any proportion of (a) & (b).

25. Though securities limit is granted for exposure to F&O and Margin positions, actual payment is required for settlement dues arising from mark-to-market losses on Futures positions, premium payments for Options bought, square off losses on Futures , Options and Intraday positions, Cash n Carry (CNC) in case of Intraday positions and brokerage (inclusive of other charges) applicable on the transactions.

Shares as Margin facility can we availed by signing “Shares as Margin” confirmation letter available in our Website www.achieversequitiesltd.com and submitting it to our Operations team mentioning the list and no of scrip you want to transfer to our Margin Account for getting limit. On receiving of the confirmation letter we will transfer your shares to our Client margin account for providing you exposure against your stock and you will start having the limit.

26. Illustration- Shares as Margin:

We provide 50% (50% Hair Cut) exposure on the Shares Client have provided us for availing **Shares as Margin** Facility. Workings of margin are given below:-

Suppose client have following margins

Cash Margin	-	-7625.00 debit
Demat Holdings	-	ITC 50 Qty
Share as Margin	-	ITC 32 Qty
So Ledger will be	-	-7625.00 debit

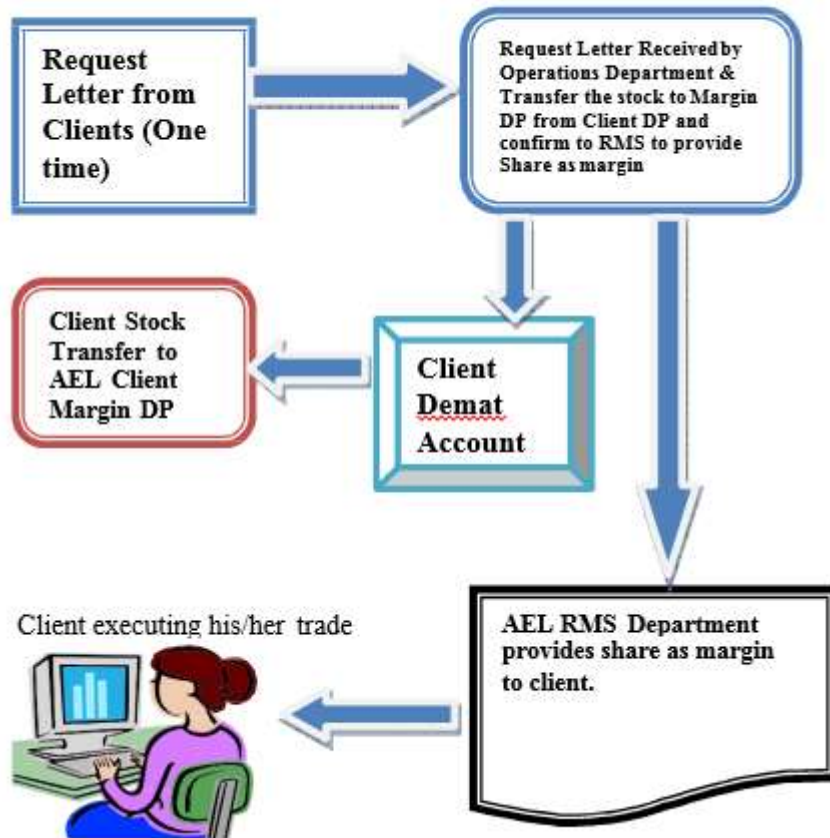
Now Margin Upload will be - Ledger Balance + Share as Margin Exposure, in this case [-7625.00 +{(ITC 32* 353.15 Ltp of last trading day=11300.8)*50%=5650.4}]

= -1974.6 debit

Note :

1. System will not consider **Shares as Margin** for Exposure on Demat Balance of rest of the 18 ITC stocks of client as the same is in Clients Demat Account, it will consider shares for exposure which are transferred to company's " Client Margin Account" in this case it is 32 stocks of ITC only.
1. We will provide list of stocks which are eligible for **Shares as Margin**, you can avail the list from DP Department plus you can download from our website.
2. List of stocks is subject to change as per Company's Policy.
3. To avail **Shares as Margin** service client have to sign the attach form and submit to DP department.

Flow Chart



Commodity & Currency Policies:

***** From 23.04.2021** Allowable margin position is set to 85% out of 100% for MCX.

That means client can utilize 85% of margin out of 100% margin uploaded in trading terminal.

E.g If client is having exposure Re. 100000/- in commodity segment, he /she can use utilize 85% that is Rs. 85000/- margin for trading whether it is intraday or position carryforward.

**** From 07.02.2019** MIS product type will not be available on MCX segment in NOW platform, you need to trade from NORMAL option only.

Old policies

1. Exposure will be 4 times on Commodity Intraday (subject to minimum balance of Rs. 5000) & 1 time on Carry forward.

*Commodity Intraday exposure reduced to 2 times w.e.f Nov 22, 2018.

*** We request you to please note that all commodities will be blocked for trading based on the
EXPIRY DATE, DELIVERY START DATE & TENDER PERIOD START DATE which one will come first.

In connection with that, you are requested to square off / roll over all your open positions before the blocking day.

For example: If Commodity SILVER is having

Expiry date on : 5th Sep, 2019

Delivery start date on : 2nd Sep, 2019

Tender period start date : 2nd Sep, 2019

As per this revised RMS policy, the SILVER Contract will be blocked from 2nd Sep. 2019. Accordingly all open position must be squared off/rolled over before 2nd Sep. 2019.

2. Exposure will be 3 times on Currency Future Intraday & 1 time for Carry forward.

***** Intraday exposure revised to two (2) times in Currency Futures w.e.f March 01, 2021.**

3. Auto square off in Intraday should be done on daily basis **10 minutes** before market closing.
4. If MTM loss crossed 70%, then no fresh trade will be allowed. One can only square off his/her existing position.
5. If MTM loss crossed 80% the position will be squared off from system.
6. If fund is received through NEFT, Prefunded Instrument like Demand draft & Cheque given from HDFC, AXIS & ICICI banks then the limit will be provided to carry forward the same day Future & Options position depending on the market conditions.
7. All open positions in MCX/NSEL segment should be squared off before the tender period; else client must be informed about his/her position and his/her intention for delivery.
8. Exposure allowed on currency option trading is 1 time.

****** Revised Exposure policy w.e.f March 19, 2018**

If MTM loss crossed 70%, the position will be squared off from system. Other policies remain unchanged.

Exposure against Demat Holding

You will get Delivery exposure against the total approved share valuation in demat account. You can carry the delivery position beyond T+5 days.

You can hold the position to the extent of your excess fully paid securities over your debit balance after deducting appropriate haircut. Please refer to the Exchange circular no. NSE/INSP/29662 dated May 8, 2015 for the same.

Some additional policies are

- Dealers are vigilant in executing the client trades and the client saudas are confirmed over phone at the end of the day. The dealers' communication with the client is carried on through voice logger's telephone system.
 - Margin Policy – For Cash segments we require a minimum margin of 20% For futures and options margin requirement is as per the Exchange norms.
 - If **margin used** is more than **cash margin available** then gentle reminder will be given to the client for maintaining sufficient balance but if **span margin requirement** is more than **cash margin available**, then position will be squared off immediately from RMS.
 - Reminder to **Squared off** of the shortfall position will be flashed on Dealing Terminal. Company will not be liable if reminder message in not been displayed properly on dealing terminal due to technical problem.
 - In Equity Future & Option segment system will calculate and block only span margin instead of initial margin (Span+Exposure).
- As per our internal policy, we have bifurcated the clients under 3 categories of risks.
1. **High Risk** –The payout shares will be transferred to Hold back account of the clients under this category till the debits are cleared and a fresh exposure will be allowed only after a confirmation of clearance of the debit is received from the client. The clients of the branches which are located outside Kolkata are by default put under High Risk Category, which will be reviewed every 3 months. Clients who do not want the shares to be delivered to their demat account and utilize the same for limit / exposure by keeping the shares in our holdback account are also mapped under this category.
 2. **Medium Risk** – The clients falling under this risk group are given the share delivery wherein the maximum ledger debit is up to Rs 10000. Exposure given on the basis of margins.
 3. **Low Risk** – These clients are well known to the company on the basis of their track record. Hence their debits up to a maximum of Rs 30000. Simultaneously exposures granted to them are a bit flexible in nature (2 times more the normal exposure norms) on the basis of available margins.
- Trades in Z category stocks are not allowed across all segments, unless permission for the same is taken and allowed after due consideration.
 - The exposure with respect to every sub-broker, Authorised person & dealers terminal is controlled through the office risk management team. In case of sub-brokers, Authorised person having direct terminals the exposure limit is defined to control the maximum risk exposure of the client. Additionally the company has also installed CTCL / IML software with the help of which the company is expanding the reach and due to the control features existing in the CTCL / IML software along with the RMS software controls are maintained on the overall operations vide every client code and every terminal / branch / sub-broker / Authorised person location.

- Contracts being traded in options are not allowed beyond the first 3 months.
- None of the clients are being entertained without the collection of upfront margin. The clients position is reviewed daily and accordingly collection is done on a daily basis by our deputed risk management executives which are in turn checked by the risk and surveillance manager who in turn reports to the Dealing Head/Surveillance head.
- Holdings in DP accounts registered with Achievers Equities Ltd. along with POA are not considered while setting the client limits.
- As a policy we have specified a single sauda limit, which is maximum 10000 in quantity terms which can be placed for trade and a maximum of Rs 20 lacs in order value terms across all clients registered with Achievers Equities Ltd. Beyond that on client request we can further increase single sauda limit subject to availability of the margin.
- The client limit is predetermined. The client limit is fixed as per the Ledger balance in line with respective client's trade history/experience, if available, his financial capacity and/or credit worthiness and referrals. If required and to exceed the limit, permission of higher authority is generally required.
- As a part of our risk management system, our team also monitors the exposures of clients on real-time basis. During market fall, we observe the position of respective client like his credit balance available with us, securities lying with us etc. and depending upon the same, we allow them to transact or create the position or to extend / subtract their position.

At the same time, we have to consider respective client's trade history/experience with us, his financial capacity and/or credit worthiness and referrals. In case, there is debit balance, client is required to provide sufficient margin / securities / funds to carry out his request for fresh buying or to create fresh position.

Objective

- ✓ To ensure none of the clients have exposures unless adequate margin is available. This ensures control of abnormal volumes which is not supported by margin.
- ✓ Maximum risk is in F&O segment. Hence monitoring of F&O is done with utmost diligence.
- ✓ To ensure monitoring of square up transactions in cash segment on daily basis.
- ✓ Prevention of punching transactions beyond the stipulated ranges.
- ✓ Prevention of trade in ill-liquid / Z category shares.
- ✓ To ensure timely collection of overdue so as to enable an efficient RMS system.

Note: Commodity trading is offered through Achievers Commercial Pvt Ltd.

Communication

Client can view details of his ledger, margin, shortfall etc through his secured login on Achievers Equities Ltd. The client has to be aware about his position, outstanding balance and Risk. Achievers Equities Ltd is under no legal obligation to send any separate communication but as a customer centric company we may take extra efforts generally to ensure that client is well informed about the Risk and the possible actions, which may follow. The communication would generally be through SMS / Email on registered contact details with Achievers Equities Ltd

Disclaimer

Achievers Equities Ltd Management will have a discretion to alter/change any of Exposure limit , selling parameter defined in this policy on the basis of prevailing market conditions with or without prior intimation and can use their discretion to grant any kind of exemption/permission in case they deem fit on case to case basis.

AEL/ ACPL will not be liable for non square off of intraday positions for any day due to any technical issue.

Enclosed below find some Important Circulars of Exchange and Regulators related to RMS



NATIONAL STOCK EXCHANGE OF INDIA LIMITED

DEPARTMENT : INSPECTION

Download Ref.No.: NSE/INSP/20638

Date : April 26, 2012

Circular Ref.No.: 136/2012

To All Members

Sub : Clarifications on funding in connection with / incidental to /consequential upon the securities business

This is with reference to the Exchange circular no. NSE/MEMB/261 dated May 27, 1997 regarding clarification given by SEBI on applicability of Rule 8(1)(f) and 8(3)(f) of Securities Contract (Regulation) Rules, 1957, relating to fund based activities of brokers.

The Exchanges and SEBI have received various representations and queries on the issue from members. The Exchange in consultation with SEBI has provided clarification on the above subject as per Annexure I.

Members may take note of the same.

**For and on behalf of
National Stock Exchange of India Limited**

C N Upadhyay
Asst. Vice President
Encl: Annexure 1

Telephone No	Fax No	Email id
+91-22-26598196	+91-22-26598194	compliance_assistance@nse.co.in

Annexure I

Clarifications

1. Debit Balances in Clients' Account

Rule 8(1)(f) and Rule 8(3)(f) of SCRR permits a trading member to fund in connection with or incidental to or consequential upon the securities business. Further, Regulation

of Part A of the Capital Market Regulations of the Exchange provides that "If a Constituent fails to make payment of consideration to the trading member in respect of any one or more securities purchased by him before the pay-in date notified by the Exchange from time to time, the Trading Member shall be at liberty to sell the securities received in pay-out, in proportion to the amount not received, after taking into account any amount lying to the credit of the Constituent, by selling equivalent securities at any time on the Exchange not later than the fifth trading day reckoned from the date of pay-in. If the trading member has not sold the securities for any reason whatsoever, such securities shall be deemed to have been closed out at the close out price declared by the Exchange for the fifth trading day. The loss, if any, on account of the close out shall be to the account of the Constituent".

Considering both of the above provisions, the following clarifications are issued on debit balances in Client's account:

- a) If debit balance arises out of client's failure to pay such amount for less than fifth trading day reckoned from date of pay-in, such debit balances would not be construed as violation relating to funding.
- b) If debit balance arises out of client's failure to pay such amount for more than fifth trading day reckoned from date of pay-in, and no further exposure is granted to client from the sixth trading day reckoned from the date of pay-in, such debit balance would not be construed as violation relating to funding.
- c) If debit balances arise out of client's failure to pay such amount for more than fifth trading day reckoned from date of pay-in, and further exposure is granted to client it would be construed as a funding violation even if fully paid collaterals are available for margins.
- d) Delayed Payment Charges or interest charge for the funds deployed by the member may be charged at the rate/s consented by the client.

For the purpose of reckoning debit balance stated above, the debit balance in the client ledger consolidated across segments (not across Exchanges) after giving effect to the release of margin to be considered.

Further, if subsequently any complaint is received regarding selling of collaterals for recovery of debit balance, as per the Regulation 3.11 of Part A of the Capital Market Regulations of the Exchange quoted above, the securities shall be deemed to have been closed out at the closing price declared by the Exchange for fifth trading day reckoned from the date of pay-in.

Collaterals as Margin

In Equity Derivative Segment and Currency Derivative Segments Members are allowed to accept approved securities from clients for margin purposes. However, Members can lodge their own securities only to the Clearing Corporation and not the clients' securities. Where Member has accepted securities with appropriate hair cut for margin purpose, but has to deploy his funds for meeting margin requirements of the client at the Exchange, Members may levy interest or delayed payment charge on debit balance as per the terms consented by the client.



CIRCULAR

CIR/DNPD/7/2011
2011

August 10,

To

Managing Director/ Chief Executive Officer Recognized
Stock Exchanges

Dear Sir/Madam,

Sub: Short-collection/Non-collection of client margins (Derivatives Segments)

1. In consultation with BSE, MCX-SX, NSE and USE, it has been decided that Stock Exchanges shall levy penalty specified hereunder on trading members for short- collection/non-collection of margins from clients in Equity and Currency Derivatives segments:

For each member	
'a'	Per day Penalty as %age of 'a'
(< Rs 1 lakh) And (< 10% of applicable margin)	0.5
(≥ Rs 1 lakh) Or (≥ 10% of applicable margin)	1.0

2. Where a = Short-collection/non-collection of margins per client per segment per day
If short/non-collection of margins for a client continues for more than 3 consecutive days, then penalty of 5% of the shortfall amount shall be levied for each day of continued shortfall beyond the 3rd day of shortfall
3. If short/non-collection of margins for a client takes place for more than 5 days in a month, then penalty of 5% of the shortfall amount shall be levied for each day, during the month, beyond the 5th day of shortfall.
4. Notwithstanding the above, if short collection of margin from clients is caused due to movement of 3% or more in the index (close to close value of Nifty/Sensex for all equity derivatives) and in the underlying currency pair (close to close settlement price of currency futures, in case of all currency derivatives) on a given day, (day T), then the penalty for short collection shall be imposed only if the shortfall continues to T+2 day.
5. All instances of non-reporting shall amount to 100% short collection and the penalty as applicable shall be charged on these instances in respect of short collection.



Securities and Exchange Board of India

6. If during inspection it is found that a member has reported falsely the margin collected from clients, the member shall be penalized 100% of the falsely reported amount along with suspension of trading for 1 day in that segment.
7. The penalty shall be collected by the Stock Exchange within five days of the last working day of the trading month and credited to its Investor Protection Fund.
8. SEBI shall examine implementation of this circular during inspection of the Stock Exchange.
9. This circular is issued in exercise of the powers conferred under Section 11(1) of the Securities and Exchange Board of India Act 1992, read with Section 10 of the Securities Contracts (Regulation) Act, 1956 to protect the interests of investors in securities and to promote the development of, and to regulate the securities market.
10. The circular shall come into force from September 1, 2011.
11. This circular is available on SEBI website at www.sebi.gov.in under the category "Derivatives- Circulars".

Yours faithfully,

Sujit Prasad
General Manager
Derivatives and New Products Department
022-2644-9460 sujitp@sebi.gov.in

Sub: Mechanism for regular monitoring of short-collection/non-collection of margins.

Sir,

1. The Commission vide its letter No. 6/6/2007- MKT-I dated 5th March, 2010 had prescribed a penalty on members of National Commodity Exchanges for non- collection/short-collection of margins from their clients.
2. During the audit/inspection of books of accounts of the members and during enquiry and investigation, the Commission has noticed several instances of non-collection/short collection of margins by members from their clients. However, there is
3. No mechanism at present to monitor on a regular basis the implementation of this directive.
4. It has also been brought to the notice of the Commission by the members of the Exchanges that since trading in commodity futures takes place till late evening, they need time to collect margins other than initial margins from their clients.
5. These issues have been discussed by the Commission with the Commodity Exchanges and their members. This issue has also been discussed by the Risk management Group of the Commission. The Risk management Group has also acknowledged the constraints faced by the members and clients and suggested that guidelines may be reviewed to provide a reasonable time to members to collect margins from their clients.

6. Hence, in order to regularly monitor the collection of margins by members and also

provide a reasonable time to members for collection of margins from their clients, the Commission has decided to revise the instructions on short-collection/ non- collection of margins issued vide earlier circular No.6/6/2007-MKT-II dated 5th March 2010 as under:-

- (i) The 'margins' for this purpose shall mean mark to market margin, special / additional margin, delivery margin or any other margin as prescribed by the Exchange to be collected by member from their clients.
- (ii) The members are required to collect upfront initial margins from their clients.
- (iii) The members will have time till 'T+2' working days to collect margins (except initial margins) from their clients.
- (iv) The Member shall report to the Exchange on T + 5 day the actual short collection/non collection of all margins from clients.
- (v) Penalty shall be levied as per the details given below on the members for short / non- collection of margins from their clients beyond T + 2 working days:

For each member	
'a'	Per day Penalty as % age of 'a'
(< Rs 1 lakh) And (< 10% of applicable margin)	0.5
(>= Rs1 lakh) Or(>= 10% of applicable margin)	1.0

Where a = Short – collection/Non-collection of margins per client per day.

- (i) If short-collection/non-collection of margins of a client continue for more than three consecutive days after T+2 working days, then a penalty for 1% of the shortfall amount shall be levied for each day of continued short fall.
- (ii) In case of short-collection /non collection of initial margins, the above penalty structure would be applicable from T day.
- (iii) The Exchanges should put in place a suitable mechanism to enable the members to report the collection of all margins from their clients at the end of each trading day and to report short collection/non-collection of all margins on the T+5 day.
- (iv) All instances of non-reporting shall amount to 100% non collection of margin and the penalty as prescribed above shall be charged on these instances in respect of non- collection.
- (v) The penalty shall be collected by the Exchanges not later than five days of the last working day of the trading month.

7. The above directives may be disseminated on the terminals of the Exchanges on receipt of this letter. A suitable circular may be issued to the members of the exchanges and compliance in this regard may be intimated to the Commission. This shall come into force w.e.f 1st April, 2014. The Exchanges may also amend their Bye- laws/Rules/ Regulations/ Business Rules suitably to incorporate the above directives of the Commission.

Yours faithfully,

SD/-

(Supriya Devasthali)
Director



Circular No.: MCX/C&S/172/2014

May 02, 2014

Mechanism for regular monitoring of short collection/ non-collection of Margins

In terms of provisions of the Rules, Bye-Laws and Business Rules of the Exchange and in continuation to circular no. MCX/C&S/109/2014 dated March 29, 2014 and in compliance of the Forward Markets Commissions directives vide letter no.6/11/2012- MKT-I, dated April 28, 2014; the members of the Exchange are notified as under:

Forward Markets Commission has now clarified on the Commission's directives dated March 14, 2014, which is as under:

- (a) The clients must ensure that the initial margins are paid in advance of trade and other margins are paid as soon as margin calls are made by Exchanges/Members. The period of T+2 days has been allowed to members to collect margin from clients taking into account the practical difficulties often faced by them only for the purpose of levy of penalty and it should not be construed that clients have been allowed 2 days to pay margin due from them.
- (b) Initial margin shall be computed as applicable at the time of the trade.
- (c) Since market participants require sufficient time to put in place necessary reporting format for implementing the Commission's directives, the penalty for short/ non- collection of margins stipulated in the circular dated 14th March, 2014 would be applicable from 1st June, 2014. However, members are under obligation to report short/non-collection of margin from client. Members are requested to take note of the directives and ensure compliance.

Himanshu Raja
Sr. Manager-Market Operations

Kindly contact Customer Support on 022 – 6649 4040 or send an email at customersupport@mcxindia.com for any clarification.

----- Corporate office -----
Multi Commodity Exchange of India Limited
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Andheri (East), Mumbai – 400 093 Tel.: 022 – 6649 4000
Fax: 022 – 6649 4151
www.mcxindia.com email: customersupport@mcxindia.com

NATIONAL STOCK EXCHANGE OF INDIA LIMITED**DEPARTMENT : INSPECTION**

Download Ref.No.: NSE/INSP/29662

Date : May 8, 2015

Circular Ref.No.: 232/2015

To All Members

Sub : Clarification on Client funding

This has reference to Exchange circular NSE/INSP/20638 dated April 26, 2012.

In partial modification to the above mentioned circular, it is clarified that the Member may grant further exposure to the clients beyond fifth trading day reckoned from pay-in date to the extent of availability of excess of client's fully paid securities over his debit balance, deposited with the Member.

On the date of further exposure, such securities shall be valued at the previous day closing rate as reduced by the appropriate haircut at a rate not less than the VAR margin rate of the security on that day (i.e. previous day).

While granting exposure, Members shall ensure that the securities are free and unencumbered in all respects and are not utilized for margin purposes in any segments of Stock Exchange/s. Such Securities should be in dematerialized form actively traded on the National Exchanges and are not declared as illiquid securities by any of the Exchanges.

Members are requested to take note of the same.

In case of any clarifications, Members may contact our below offices:

CENTRE	CONTACT NO.	E MAIL ID
Ahmedabad	079-49008632	inspectionahm@nse.co.in
Chennai	044-28479915 / 17	Inspection_CRO@nse.co.in
Delhi	011-23459143/146	Delhi_Inspection@nse.co.in
Kolkata	033-40400411 / 406	Inspection_Kolkata@nse.co.in
Mumbai	022-25045224 / 227	compliance_wro@nse.co.in

For and on behalf of
National Stock Exchange of India Limited
Dr. Dinesh Kumar Soni
Assistant Vice President

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Thank You

