Raghunandan Capital (P) Ltd. has designed following RMS Policy for trading in Equity / Commodity / Derivatives / Currency Derivatives Segments. The Policy shall be applicable to all the clients trading through RCPL in Equity / Commodity / Derivatives / Currency Derivatives Segments of NSE / BSE / MCX / NCDEX & MSEI as the case may be.

Types of Risk and Margins in both Cash & Derivatives segments (Including Currency Derivatives Segment) and Commodity Segment (MCX and NCDEX):

Risk is generally used synonymously with the probability of known loss. Risk can be categorized into the following three types:

- Low Risk
- Technical Risk
- High Risk

To cover the above different types of risk, various types of margins are required to be collected from the clients to allow to trade and also to minimize the risk arising to member when there is sudden down fall in the stock market.

Margin is a minimum amount of funds and /or securities that must be held by a client in a trading account in order to allow trading in both Cash and Derivatives markets and Commodity market also.

Certain types of margins are required to be collected from the clients on upfront basis and others as per his trading practice and requirement of the Exchange.

COMPUTATION OF FREE BALANCE :The Company has the system to provide trading limits based on the Total Available Margin and the same shall be computed as under:

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Sl.	**PARLICULATS**	**Total Available Margin**
(i)	Net Credit Balance in Running A/c	100%
(ii)	Margin Deposit (Funds)	100%
(iii)	Margin Deposit (Shares lying with us / Shares lying in DDPI A/c after applicable haircut) To be considered up to 100% of clear balance equal to (i) and (ii) above	100%

1. TRADING LIMITS :

INTRA DAY TRADING LIMITS (Margin Tag)	LIMIT MULTIPLIER CM	LIMIT MULTIPLIER F&O/CD
On Total Available Margin	As per Applicable VAR Margin	As per Applicable Span + MTM Margin
CARRY FORWARD TRADING LIMITS (Delivery Tag)		
In case daily MTM till 03.00 p.m. is less than 25 % of Total Available Margin	2-3 Times of Available Free Balance	As per Applicable Span + MTM Margin
In case daily MTM during the day is more than 25 % of Total Available Margin till 03.00 p.m.	2 Times of Total Available Margin less MTM during the Day	1 times of Total available Margin less MTM during the Day

Generally Client should be restricted to trade in penny stock. However, if the clients are allowed to trade in penny stock like in T,TS and Z group,100 % margin shall be charged or recovered from the client as per discretion of RMS team and ensure that these stocks are not counted for giving exposure to the client.

Further, the management shall have the ultimate authority and can restrict the client for doing trade in particular securities including penny stocks.

Ensure that scrip which is banned, illiquid or T, TS &Z category for collaterals does not form part for calculating collateral margin. Management shall have the ultimate authority and can restrict client for doing trade in any particular securities/stocks including illiquid scrips or above mentioned categories.

REQUIREMENT OF MARGIN:

• Eligible securities given as a pledge will be accepted as margin after exchange VAR+ELM. Stock list will change from time to time.

• A client has to provide upfront margin (VAR+ELM) in the form of either cash or stocks as a margin pledge and is valued after appropriate haircut.

• For every fresh position that the client wish to take, the client has to have sufficient upfront margin (VAR+ELM) available in his account. The margin requirement for any trade depends upon margin available (clear ledger plus margin pledge stock after hair-cut) in beginning of day.

• Intraday additional margin levy, profit or loss incurred during the day, running loss / notional loss, is also accounted for by the system for the purpose of margin availability calculations.

• The margin requirement imposed by the Exchange is subject to change as may be decided by Exchange from time to time. Client is required to maintain minimum margin to the extent of MG13 report for every segment. Further based on the assessment of market volatility, member reserves the right to levy additional margin which is over and above the exchange defined margins.

2. MARGIN CALLS:

First Margin Call will be given as soon as the MTM Loss reaches 50 % of the Total Available Margin and client will be asked to submit fresh margin or reduce the positions and the client will be in square off mode until he provides fresh margin or his MTM comes below 40% of Free Balance.

Second Margin Call will be given when MTM Loss exceeds 65% of Available Clear Balance and if client does not bring in fresh margin or reduces his exposure himself before MTM reaches 80% of clear balance his positions will be squared off without further notice.

For this purpose calls to be made on registered Mobile No / emails sent to registered email addresses/ fax sent of registered fax no shall be treated as valid delivery of margin calls.

In case of Square off of the positions best efforts to be made to leave open positions to the extent that could ordinarily be carried forward as per Exchange norms on the available free balance after setting aside the MTM Loss for the day till 3.00 p.m..

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While closing out, the positions with highest margin/highest MTM Loss will be closed out first.

For Margin Tag the time limit will be 3.15 p.m. for squaring off outstanding positions and after 3.15 p.m. Square Off mode will be activated and no fresh orders will be allowed in margin tag.

3. All the cheque once committed for carry forward positions / intraday limits must be deposited and cleared irrespective of margin requirement during subsequent days.

RMS department shall maintain the list of all the fake cheque commitments and ensure due clearance of the same

4. In equity Segment all debits must be cleared off latest by T+2, else RMS will sell deliveries on T+3 by 02.30 p.m. to regularize the account.

5. All the new listings in T 2 T settlement will be disabled for selling by default by the RMS department and only the clients who transfer their shares in advance to the pool account will be able to sell on the listing day.

6. Defaulter List shall be prepared and bought to the notice of Management on monthly basis. The Management reserves the right to remove any person form defaulter list in consultation with concerned VPs.

7. Payment control Report for debit recovery from the clients is made on daily basis and follow-up for the payment on regular basis done by RMS department.

Only client stocks appearing on the approved list of NSE,BSE & MCX ,NCDEX(after removing the illiquid scrips as appearing on NSE,BSE and MCX,NCDEX(Illiquid list) shall be considered for margin purposes. However, the RMS Head can decide any specific inclusion or exclusion from the collaterals based on exceptional circumstances by giving prior approval in writing.

8. System/Network Congestion Risk:

Trading on the Exchange is in electronic mode, based on satellite/ leased line communications, combination of technologies and computer systems to place and route orders. Thus, there exists a possibility of communication failure or system problems or slow or delayed response from system or trading halt, or any such other problem/glitch including delayed or missed OTPs whereby not being able to establish access to the trading system/network, which may be beyond the control of and may result in delay in processing or not processing buy or sell orders either in part or in full. You are cautioned to note that although these problems may be temporary in nature, but when you have outstanding open positions or unexecuted orders, these represent a risk because of your obligations to settle all executed transactions. The losses if any arising out of such systems/network risk shall be of the client itself.

The Client shall not have any claim against the Exchange or the Stock broker on account of any interruption, non- availability or malfunctioning of the RCPL trading system or Service or the Exchange's service or systems or non-execution of his orders due to any link/system failure at the Client/Stock brokers/Exchange end for any reason beyond the control of the RCPL/Exchanges.

9. Demat Debit and Pledge Instruction:

Clients who have opened their trading accounts are expected to sign Demat Debit and Pledge Instruction'(DDPI), under which the clients shall explicitly agree to authorize the stock broker and depository participant to access their BO account for the limited purpose of meeting pay-in obligations for settlement of trades executed by them. The DDPI shall serve the same purpose of PoA and significantly mitigate the misuse of PoA. The use of DDPI shall be limited only for the two purpose

1. For transfer of securities held in the beneficial owner account of the client towards Stock

Exchange related deliveries / settlement obligations arising out of trades executed by such a client on the Stock Exchange through the same stock broker.

2. For pledging / re-pledging of securities in favour of the trading member (TM) / clearing member (CM) for the purpose of meeting margin requirements of the client in connection with the trades executed by such a client on the Stock Exchange.

Policy Framework for Voluntary Freezing/Blocking of Online Trading Account Access for Clients

Introduction:

In an effort to enhance the ease of business operations and investment activities for investors, and to safeguard investors from suspicious activities, SEBI, through its Circular Ref. No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, has mandated a framework for stock exchanges. This framework requires Trading Members to provide clients with the facility to voluntarily freeze/block online access to their trading accounts. Consequently, stock exchanges have issued circulars detailing this framework. In line with these directives, the following policy has been formulated for the voluntary freezing/blocking of trading accounts.

1. Mode of Request for Freezing/Blocking the Trading Account:

Clients can choose from the following options to freeze/block their trading account:

Option A: Clients can send an email to ***stoptrade@rmoneyindia.com*** from their registered email ID. Upon receipt of the email, the RCPL team will call the client to confirm the request. The client must accept the call and complete the necessary confirmation steps.

Option B: Clients can log in to our mobile app and click on **My Profile** to freeze/block their account

Note: Any of the above options can be used to freeze/block the trading account. Once the account is frozen/blocked, all online access will be unavailable.

2. Procedure to Unfreeze/Unblock the Account:

Clients wishing to unfreeze/unblock their account must send an email to stoptrade@rmoneyindia.com from their registered email ID. Upon receipt of the email, the

RCPL team will contact the client to confirm the request. The account will be unfrozen only after the client confirms the request over the call.

Timelines for Freezing/Blocking the Online Access:

Scenario	Timelines for Issuing Acknowledgement and Freezing/Blocking
Request received during trading hours and within 15 minutes before the start of trading	Within 15 minutes
Request received after trading hours and 15 minutes before the start of the next trading session	Before the start of the next trading session

Note: By opting to block/freeze the account, you are only blocking online access to your trading account. There will be no restrictions on the risk management activities of RCPL.

Clarifications

1. Freezing/blocking only restricts online access to the client's trading account. There will be no restrictions on the risk management activities of RCPL.

2. The request for freezing/blocking does not equate to marking the client's Unique Client Code (UCC) as inactive in the Exchange records.

SEBI Circular on 50% Cash Collateral Requirement

To comply with SEBI Circular SEBI/HO/MRD2_DCAP/CIR/2021/0598 dated July 20, 2021 and subsequent amendments, collateral shall be calculated exchange-wise and segment-wise. Clients shall maintain at least 50% of total collateral in the form of cash or cash equivalents. Cash equivalents shall include instruments permitted by SEBI, Exchanges and Clearing Corporations from time to time. In case of shortfall in the cash component, penalties, margin consequences and other charges levied by Exchanges/Clearing Corporations shall be borne by the client. The Company may call for additional cash margins, reduce exposure, restrict trading or square off positions to ensure regulatory compliance.

"In view of the above, clients are required to maintain a minimum of 50% Cash / Cash-equivalent margin, computed exchange-wise and segment-wise, to meet their margin obligations arising from their respective positions.

In the event of any shortfall in the cash component, RCPL funds will be utilised to meet the client's margin obligation. Such utilisation will attract interest charges @ 7% (intraday) & 12%(Carryforward) p.a., calculated for the period during which the cash shortfall persists i.e., until the client either squares off the position or adequately funds the cash portion of the margin requirement."

For: **Raghunandan Capital (P) Ltd**

(RMS Department)