

RMS & INTERNAL CONTROL POLICY OF FORTUNE

The Company has the system to provide limits for trading based on the margin of the client available with the company in the form of funds / securities.

The Details of Intraday Margin Timings are given below:

Equity / CM	Futures & Options	Currency	Commodity
9.15 a.m. to 3.20 p.m.	9.15 a.m. to 3.20 p.m.	9.00 a.m. to 4.45 p.m.	15 Minutes before Market Closing

NSE, BSE EQUITY:

1. Full value of the funds of the clients available with the company is considered for the purpose of opening of the trading limits.
2. For the purpose of opening of trading limits, upto 50% haircut is taken on the scrips available in F & O segment of NSE. Collateral Margin will be applicable for intraday trades of scrips available in F & O segment of NSE to trade in Cash Segment and not for F&O, CD and Delivery Trades of Cash Segment.
3. In cash segment an intra day limit of 5 times (Subject to change depending on market scenario) of the margin available is given to the client to trade in Scrips available in NSE F&O Segment only. Square-off of all Intraday Equity / CM and Futures & Options positions if not converted happens at 3.20 p.m. and for Currency & Commodity Derivatives @ 15 Minutes before the Market Closing everyday.
4. In case of delivery transactions, funds is required to be available upfront in the Ledger.

NSE, BSE Futures (Equity & Currency):

1. In Future Segment, an intra day limit of 5 times (Subject to change depending on market scenario) of Margin available to the client.
2. Leveraged intra day exposure for Nifty, Bank Nifty.
3. Square-off of all Futures position starts at 3.20 p.m. every day, if you don't have the requisite margin.
4. For holding F & O transaction overnight, exchange stipulated margins are required.

NSE, BSE & CURRENCY Options:

1. MIS will not be available for Options trading. Funds is required to be available upfront in the Ledger for Options trading.
2. Carried Forward / Overnight position, exchange stipulated margins are required.

NSE Currency Future:

1. Leveraged Intra-day exposure (Subject to change depending on market scenario) available to the client for trading in USD – INR only.
2. Square-off of all Currency Futures position starts at 4.45 p.m. every day, if you don't have the requisite margin.
3. For holding Currency Future transaction overnight, exchange stipulated margins are required.

Commodity:

1. Leveraged intra day exposure (Subject to change depending on market scenario) available to the client for trading in MCX Commodities.
2. Square-off of all Commodities position starts 15 minutes before market closing every day if you don't have the requisite margin.
3. For holding overnight position, exchange stipulated margins are required.

ONLINE MONITORING / RMS FUNCTIONS: Cash, F&O, Currency & Commodities

- Margin Calls will be sent via SMS on or above MTM loss of 50% onwards for every 5% to the Registered Mobile No. updated in our Master.
- Our RMS Desk is continuously monitoring all M to M profits / losses of the client and if the losses of the client are 70% or more (inclusive of Brokerage, Statutory Levies & Other Levies etc., as applicable) of the Fund / Securities of the clients, all the open position/s of the client is/are squared off without intimation to the client after cancelling the pending orders from the system.
- Square-off order initiated when the MTM reaches 70% of loss and the order can be matched only on the available price in the market and we can't guarantee the square-off taken place at 70% all the time. The % can vary depending on the matched price of the square off order.
- The client trading will get blocked after Margin Square – off for further trading and can be unblocked only on specific request from the client for trading with the available margin.

Acceptance of Unique E-Mail ID & Mobile No. from Clients for Trading & DP Accounts:

This has reference to SEBI circular CIR/MIRSD/15/2011 dated August 02, 2011, Exchange circulars NSE/INVG/21841 dated October 4, 2012, NSE/INSP/27339 dated August 12, 2014 and NSE/INSP/27368 dated August 18, 2014 regarding updation of E-mail IDs and mobile numbers of clients. Our Management has decided to implement the acceptance of Unique Contact details such as E-mail ID & Mobile No. from the clients for all their Trading and DP Accounts opening through us.

Exchange has clubbed the open positions to check for position limit violations at client level & any violation will attract penalty provisions as per circular MCX/S&I/331/2016 dated September 29, 2016. In accordance with circular no. MCX/S&I/331/2016 dated September 29, 2016, Exchange has clubbed the client codes with common/same mobile numbers or e-mail ids registered under Trading Member and these clients attract the provisions / patterns such as 'persons acting in concert', through common ownership and / or control structure or same family / group, based on same Email and Contact Details.

Contract Note & Margin Statements

1. Contract Notes and margin statements for the transactions executed by the clients are sent to them through e-mail within 24 hours of the trade.
2. In F& O Segment trading M to M and Margin on the outstanding positions are informed to the clients on daily basis. via E-mail.

Payout: All payouts will have to be compulsorily placed on the Back office access provided to the clients. All payout requests will be processed electronically and the credit shall come to the client's bank account.

- Withdrawal request placed before 8.45 a.m. in CASH, F&O and CD will be processed on the same day. Requests placed after 8:45 a.m. will be processed on the next working day.
- Withdrawal request placed before 9.20 a.m. in Commodities will be processed on the same day. Requests placed after 9:20 a.m. will be processed on the next working day.
- Withdrawal request placed on Saturday, Sunday and Bank Holidays will be processed on the next working day.

Higher Retention % while Actual Settlement of Clients Funds & Securities during Volatile / Fluctuating Market:

In respect of Derivative Market transactions, apart from the margin liability as on the date of settlement, the Member may retain additional margin requirement of maximum up to 200% of margin requirement during Volatile / Fluctuating Market instead of 125% on the day of settlement to take care of any margin obligation arising in next 5 days. The additional higher retention of upto 200% will be applied during Volatile / fluctuating Market only to safeguard the clients open positions from Square-off due to Margin shortfall.

Shares Trading under Graded Surveillance Measure (GSM), Additional Surveillance Margin (ASM)

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 which witness an abnormal price rise not commensurate with financial health and fundamentals like Earnings, Book value, Fixed assets, Net-worth, P/E multiple, etc.

Based on a periodic review and in consultation between SEBI, Exchanges and Clearing Corporations, additional surveillance margins shall also be levied as per Circular No. NSCCL/CMPT/38123 Dt.22nd Jun 2018, the Trading Members can collect the requisite margins from their Trading Clients.

In view of the above, the scrips available under GSM / ASM in any form will not be available for trading and can be enabled on specific client request by meeting the additional margin requirements. The client can be allowed for trading in the above category scrips on specific request by adhering the compliance / margin requirements only. The scrips can't be available for trading by default.

Investor Grievances:

The Compliance Officer shall be the designated officer for handling the Investors Grievances and Client Complaints. The email ID you can write to in case you have any grievance is ftc@ftconline.in. The resolution of the Complaint shall be done at the earliest

IMPORTANT NOTES:

- We are not engaged in the business of Client Funding. Clients are required to have

sufficient balance in their accounts to hold / carry forward positions.

- Call & Trade charge is applicable for the positions squared-off due to insufficient margin.
- Option premium received from writing options will not be considered as Cash / Capital.
- Positions which do not have sufficient funds can be cut any time at the discretion of our RMS desk. There will be no margin calls or intimation from our RMS desk.
- All Long, Option Open positions will be closed on the settlement day by our RMS team after 3.00 p.m if bids are available. Because STT will be charged by the Exchange @ 0.1250% on turnover (i.e. Strike Price + Premium X Qty) instead of 0.01% ((Prem * Qty) while exercising.
- Trading in MCX contracts will be banned during tender period.
- Fines levied by the exchange for short margin will be payable by the client.
- Payments will only be accepted from the client's registered bank / mapped accounts with us. Cash and Demand Drafts are not accepted.
- Rs.500/- will be retained and the balance will be released if clients requesting for full payout who are Trading in NSE & BSE with DP account. The retention towards charges to be met out for DP Dues (transactions charges etc.,)
- We will not allow the clients to trade in any segment on the same day against the sale proceeds (carried forward of Open positions) of Equity Options or Currency Options except on the same Options segments.
- Client can liquidate the Open Long Options at Market Price after their positions got square-off due to Margin Shortfall of on/above 70% as system will not allow to keep open pending orders. In case if they wish to place the limit order for their open long options, they can call the support (044-45609696) to place the order.
- The client should not be allowed for trading if RMS action is taken due to margin shortfall and they will not be permitted for trading for the remaining day after squaring off of the open positions. If a client insist for trading by transferring an additional amount, the treatment of the amount will be described below

The amount transferred during the day / trading hours by the client after the RMS is set (before market / trading opens) will be added to the Margin available with the opening hours of trading and MTM rule will be the same. e.g. If a client has a opening balance of Rs.50,000/-, the square-off / closed out will be taken if MTM loss reaches on or above Rs.35,000/- at the available / ruling price. If a client wishes to trade further by transferring an amount of Rs.40,000/-, the amount will be added to the opening Margin amount of Rs.50,000/- resulted in total margin of Rs.90,000/- & MTM (booked) loss of Rs.35,000/- will be kept separately as the day is not over. In such case, RMS action will be initiated if MTM loss of over and above Rs.63,000/- (70% of 90,000/-). As the client already had a 35000/- MTM Loss, close out for fresh open positions will be taken if fresh loss of over and above Rs.28,000/- (i.e. Rs. 63,000.00 - Rs.35,000/-).

All information mentioned above is subject to change at the discretion of our Risk Management team.