

Policies and Procedures

Univest Stock Broking Private Limited is a trading member of the National Stock Exchange of India Limited "NSE" and BSE Limited "BSE" in Equity and Equity Derivatives segment, and Multi Commodity Exchange of India Limited "MCX" in Commodity derivative segment, and a depository participant of National Securities Depository Limited "NSDL", having its registered office at Office No. 123, F.F Plot No - R/9 & 10 Sharan Business, Sector 26, Gandhinagar , Gujarat- 382026 and corporate office at Ground Floor, Unitech Commercial Tower 2, Arya Samaj Road, Block B, Greenwood City, Sector 45 Gurugram, Haryana- 122003, (hereinafter together referred to as "Univest").

For the purpose of these Policies & Procedures, wherever the context so mentions "Client", "You" or "Your", it shall mean any natural or legal person who has agreed to open an account or initiate the process of opening an account with Univest by providing their information while registering on the platform as a user. Univest allows any person to surf the website without registering on the website. The term "We", "Us", "Our" and "Team Univest" shall mean Univest Stock Broking Private Limited. Please note that the 'Policies and Procedures' should be read with and as a part of our Terms and Conditions available here. These terms and conditions are in addition to and should be read with the main T&C of the website i.e. www.univest.in and Univest Mobile application, and the user and account opening agreement between You and Univest. You agree to any and all changes to the Terms without specific communication from Univest, by Your continuing to hold an account with Univest and/or using Univest Platform.

Terms:

1. Demat account

- i) On opening an account with Univest, a demat account and a trading account in your name shall be opened and operational with Univest. Univest opens demat accounts under Univest's own depository participant registration.
- ii) Transfers of shares from a third-party demat account into Univest's pool account and subsequent selling of such stocks is not allowed.
- iii) Univest will maintain all client securities in a designated account called the Client Beneficiary Account. The securities of Univest will be kept in a separate demat account termed as Univest Beneficiary Account. The clients' and Univest's own securities will not be mixed with each other.

- iv) All securities purchased by you shall be transferred to your demat account by T+1 day or as stipulated by the regulator from time to time.
- v) Clients shall avail the Basic Service Demat Account “BSDA” benefits as described by the exchange/SEBI/ depository from time to time. Kindly refer to this page for FAQ pertaining to BSDA.
- vi) You can view your demat account balance directly on the depository website.

2. Trading

Client trades shall be carried out under the respective unique client code only. The Client shall be the only person/entity with access to its trading and demat account. Any sharing of user credentials is not permitted. The Client shall be solely liable for any losses arising from misuse of its user credentials, and Univest shall not be liable for any error or misuse of the client while placing a trade.

3. Univest charges

- i) Refer to Annexure 1 for our updated charge list.
- ii) The Client agrees to pay Univest all brokerages, transaction charges, commissions, fees, GST, and other taxes or levies, by whatever name so called, as informed to the Client by Univest from time to time in writing. Univest shall be entitled to deduct such fees or levies from the Client’s account or trading ledger, in lieu of the services received by the Client from Univest.

4. Penalties

Charges applicable for negative/debit balance are as follows.

- i) Delayed payment charges

Univest posts the settlement obligation towards transactions in the client ledger on the settlement date. All clients are advised to make the payment before the pay-in time on the settlement day, though there are instances wherein clients may delay the payment beyond the settlement date.

However, a broker must meet the settlement obligation in time as per applicable law. Therefore, to ensure timely receipt of funds from clients towards their payment obligation, charges for delayed payment are levied in the client’s account. Charges for delayed payment are levied to discourage

delayed payment from clients who do not deposit the required sum of money before the payin time on the payin day.

Charges for delayed payment are levied on the respective ledger debit of the clients at a rate, defined in Annexure 1, per day of the debit balance in the account. For the purpose of arriving at the debit balance, the debit balance in the client ledger is consolidated across all segments of the respective exchange after giving effect to the release of margin.

5. Funds

Payin and payouts on Univest's Platforms are as follows:

A. Payin:

- i) Clients can transfer funds into the Trading Account only from such bank account(s) that are registered with Univest on the Platform. Any transfer from a non-registered bank account will not be considered and the client does not get any trading credit for such transfers. Clients shall be solely liable for any losses due to transferring funds from a non-registered bank account.
- ii) The client can transfer funds using UPI and net banking services, from the payment gateway facility available on the trading platform
- iii) Payments using UPI are free. Payments made through net banking will be charged as defined in Annexure 1.
- iv) Payments cannot be made via cash and DD.

B. Payout:

- i) All payout requests will have to be placed on the Univest web and/or app platform. All payout requests will be processed electronically and the credit will be to the client's primary bank account within 24 hours of processing the payout request.
- ii) Funds added to your trading account on the day cannot be withdrawn on the same day.

6. Square-off timings

- i) Intraday products square-off timings:

Tem	Equity/Cash	Equity derivatives
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Intraday Margin Time	3:15 PM onwards	3: PM onwards
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- ii) Note that intraday square off timings can change based on the discretion of Uninvest/ any day market timings are changed by exchange.
- iii) The Client is solely responsible for squaring off all open positions within these times.
- iv) If any intraday position or an MIS trade is not squared off on the same day due to any reason, including link or system failure or any risks associated with internet/wireless-based trading which may occur at the end of the Client, Uninvest or the respective Exchange, it shall be treated as a Cash and Carry ("CNC") or NRML position and carried forward to the next trading day. In case such a situation arises, the onus of squaring off the position will be on the Client.
- v) Our RMS desk shall square off any such position, without the requirement of a margin call, if the necessary cash is not available in the Client's account, at the discretion of Uninvest. There may be no calls or intimation from Uninvest. A charge as defined in Annexure 1 will be applicable for all positions squared off by our RMS desk, including auto square off.

7. Margins

- i) Comprehensive real-time margins at Uninvest can be viewed here.
- ii) The margin policy for the various products is mentioned below:
 - NSE/BSE Equity: Uninvest, by policy, does not provide margin for equity delivery trades. The client should have enough money in his trading account to take delivery of shares, failing which Uninvest can cut the position.
 - Uninvest does not provide margin facility for F&O trade.
- iii) Please note that Uninvest does not engage in the business of Client Funding. Clients are required to have sufficient balance in their accounts to hold/carry forward positions.
- iv) Positions that do not have sufficient funds can be cut at any time at the discretion of our RMS desk. There will be no margin calls or intimation from our RMS desk. During times of extreme volatility, the loss could be more than the funds available in your account before the position is squared off. All

resulting charges or debts that might occur from such square offs will have to be borne by the client.

- v) The Client shall also be furnished with a copy of the daily margin status for the days that the Client has traded, and is also available on Univest App.

8. Closing your account

- A Client account can be closed upon a specific request from the client. The account can be closed offline and online.
- The closure shall be effective within a period of seven working days from the date of application/intimation or the date of settlement of accounts, whichever is later.
- Settlement of account shall mean that there is no outstanding balance of shares or funds in the books of the client with Univest, and the same is confirmed by the Univest. The date of confirmation shall be the effective date of settlement.
- When there is no trading activity for 12 consecutive months in an account, exchanges consider the account inactive. We do not close such dormant accounts. Instead, the Client is required to re-verify KYC details as part of Univest's additional due diligence measures. Post re-verification, the account can be used by the Client.
- We reserve the right to reject fresh applications to open an account to an individual who frequently closes and reopens accounts on any grounds.

9. Internet-based trading and Security Trading through Wireless technology

- Univest is permitted to offer trading via online platforms, and adheres to SEBI's regulations for internet based trading (IBT) and Security Trading through Wireless technology (STWT).
- You are solely responsible to keep your Username and Password safe. You are solely responsible for any actions taken using your account, even if someone else does so without your permission.
- You understand and agree that using the internet for any purpose, including trading on Univest, is not 100% fool-proof and has risks. Trading online can have technology related interruptions and issues. Univest and the exchange do not represent or warrant that their services will always be available without interruption.
- Univest shall not be liable for any actions taken through your account, whether authorized or not, and for any losses or damages (real or notional) arising out of the suspension, interruption, non-availability or malfunctioning

of Univest's IBT and STWT system, the Exchange's service or systems or non-execution of his orders due to any link / system failure at the Client/Univest/Exchange end for any reason beyond the control of Univest/Exchange.

10. Risk disclosure

You understand that trading in equity, derivatives contracts or other instruments traded on the Exchange have a varying element of risk and may not be appropriate for someone of limited resources/limited investment and/or trading experience and low risk tolerance.

You acknowledge and accept that there can be no guarantee of profits or no exception from losses while executing orders for purchase and/or sale of a derivative contract being traded on Exchanges.

In case you trade on the Exchanges and suffer adverse consequences or loss, you shall be solely responsible for the same and Univest/ the stock exchanges and/or SEBI shall not be responsible, in any manner whatsoever, for the same.

The following are illustrative basic risks of trading:

- Higher volatility: Higher volatility means prices of securities can change a lot. When you trade, your order might not be fully executed, or the price at which your order is executed could be very different from what you expect, leading to losses.
- Lower liquidity: Some securities might not have many buyers or sellers, making it harder to trade them quickly or at a price you expect. This could lead to partial execution of your order, a bigger difference in price, or no execution at all.
- Wider spreads: The spread is the difference between buying and selling prices. Less liquid securities can have wider spreads, which means you might pay more when buying or receive less when selling.
- Risk-reducing orders: Stop loss or limit orders may not be effective, as rapid movement in market conditions may make it impossible to execute such orders.
- System risk: Trading can be very busy at opening, closing, or any time during the day. This could lead to delays in executing or confirming orders. Trading may also stop temporarily if there are unusual events or technical issues. Trading uses technology, and there could be problems

such as communication failures, slow responses, or system glitches. This might delay or prevent your orders from being processed.

Business operation continuity management policy

I. Purpose

- This business operation continuity policy outlines the strategies and procedures that Univest Stock Broking Private Limited (hereinafter “Univest”) will follow to ensure the continuity of our critical services in the event of a disruption.

The objectives of this policy are

- i) To ensure the availability and reduce downtime of our online services to customers, and
- ii) Protect critical data, systems, and infrastructure from potential threats and vulnerabilities, both internal and external.

II. Information security

- Our systems are hosted at the Sify data center in Mumbai.
- At present, we have a production server and a backup server in place for Univest’s operations. Both these servers have been synced together to ensure that all data is updated in the backup server in real time.
- In case of a primary server failure, alternate communication will be carried out from the secondary server.

III. Recovery procedures

- Network failure:

Our systems are hosted at the Sify data center in Mumbai. The data is backed up through storage folders in a highly secured manner, with a) one copy of the backup on the same server itself, b) another copy stored in the backup server & c) stored on external media devices. This shall help restore access of the data as required.

- System / hard disk failure:

To avoid single points of failure, we run parallel servers that are operational simultaneously. This limits redundancy so that the Clients can be provided services with limited downtime delay.

Univest AML and CFT Policy

1. Background

SEBI vide circular dated 18th January 2006, along with all its updates, requires all 'Market intermediaries' to lay down a policy framework for anti-money laundering measures to be followed. SEBI has also issued a Master circular dated 19th December 2008, which consolidates all the requirements/obligations issued with regard to AML/CFT, last updated on June 6, 2024 and further from time to time. Stock Univest Broking Private Limited (hereinafter "Univest") being a Stock Broker and therefore a market intermediary, is required to adhere to the Master Circular.

2. Objective

The objective of this PMLA policy is to have a system in place for preventing any money laundering financial transactions through Univest, and to identify, monitor, and report any such transaction to appropriate authorities.

"Know Your Customer" (KYC) is the guiding principle behind the Anti-Money Laundering (AML) measures. It incorporates the "Know Your Customer" Standards & "Anti Money Laundering" Measures, hereinafter to be referred to as "KYC Standards" and "AML Measures". The objective is to have in place adequate policies, practices and procedures that promote high ethical and professional standards and prevent Univest from being used, intentionally or unintentionally, by criminal elements. KYC Standards and AML Measures would enable Univest to know/ understand its customers, the beneficial owners, the principals behind customers who are acting as agents and their financial dealings better which in turn will help Univest manage its risks prudently.

The management of the company is fully committed to establish appropriate policies and procedures for ensuring effectiveness and compliance concerning all relevant legal requirements, and undertakes to periodically review the policies.

3. Regulatory requirements

Ankit Jaiswal is the Principal Officer responsible for ensuring the proper discharge of all legal requirements and for:

- Compliance of the provisions of the PMLA and AML guidelines
- Acting as a central reference point and play an active role in identification & assessment of potential suspicious transactions
- Ensuring that Univest discharges its legal obligation to report suspicious transactions to concerned authorities.

This policy is in relation to customer due diligence, which means:

- Obtaining sufficient information about the client to identify who is the actual beneficial owner of the securities or on whose behalf transaction is conducted
- Verify the customer's identity using reliable independent source document, data or information
- Conduct on-going due diligence and scrutiny of the account/ client to ensure that the transactions conducted are consistent with the clients' background/ financial status, its activities and risk profile.

The customer due diligence process includes three specific parameters:

- Policy for acceptance of clients: Each client should be met in person or complete KYC must be done online. No account may be opened in a fictitious/benami name or as an anonymous account.
- Suspicious transaction identification and reporting: Any unusual activity compared to past transactions of a client, sudden activity in dormant accounts, or a sudden increase in volume or value transactions is classified as suspicious transactions. These shall be reported to the SEBI and any other person as laid down in applicable law.
- NSDL respective circulars, and all other applicable regulations advise that beneficial owners should submit/update their Aadhar with their Depository Participant. Please ensure that you update your Aadhar with Univest as per these applicable regulations.

4. Client identification

Before opening any account with us, the following measures shall be taken:

- i) In-person or complete online KYC verification of the client,
- ii) Identify beneficial ownership and control, i.e., determine the persons who beneficially own/control the account,
- iii) Collect information about the Client's background, and occupation and also determine the introducer, if any,
- iv) Collect and verify all original documents from the client,
- v) Collect a certified copy of valid documents showing details of his permanent address, current address, PAN, nature of his occupation, and financial status and a recent photograph,
- vi) For clients trading in F&O segment, documentary proof of his financial details will be collected, determined by policies from time to time,
- vii) Corporate clients:
 - Collect copies of the certificate of incorporation, the memorandum of association and other documents required by SEBI, and
 - collect adequate information of the persons authorised to deal on behalf of the company.

5. KYC updating process

- i) All corporate clients must submit their annual report to Uninvest every year.
- ii) In the case of individual clients, each Client's master details shall be sent to the client, who will then confirm that the details are updated correctly, or shall revise or provide details as required. He shall also specify his present occupation and financial income details per annum in the same declaration.
- iii) No account shall be opened if the client is unable to or refuses follow the KYC related required.
- iv) The information shall be adequate to satisfy competent authorities (regulatory/ enforcement authorities) in the future that due diligence was observed by Uninvest in compliance with the Guidelines.
- v) Failure by a prospective client to provide satisfactory evidence of identity should be noted and reported to the Principal Officer.
- vi) Further, Uninvest should follow up with clients where inconsistencies in the information provided are found, until the client corrects the inconsistencies or provides reasonable proof for the same.

6. Client categorisation

- i) Each client will be marked into 3 categories, High Risk, Medium Risk and Low Risk from the point of view of the anti money laundering laws. The categorization will be made based on the following parameters/ factors of risk perception: nature of business activity, trading turnover per day, manner of making payments on Univest's platforms, etc. Univest shall internally mark the risk category of each client, and high-risk clients will require regular KYC updates as determined by Univest.
- ii) Risk profiling may also vary for high net-worth individuals, trusts, non-profits, charitable organizations, and companies with close family shareholdings.
- iii) As a general rule, clients who make payments on time and take delivery of shares may be considered low risk.

7. Suspended Persons

SEBI and other authorities suspend or debar persons / entities from participating in the securities market on several instances. Univest as a stock broker is required to ensure that such persons do not trade through us. Such person should refrain from trade with Univest.

8. Role of Compliance Team & Internal Audit:

- i) The compliance team will play an important role in ensuring compliance of the above policies and procedures. The account opening team will exercise adequate due diligence while onboarding clients. There will be periodic checking by the Principal Officer and the same report will be properly filed by Univest.
- ii) Here is a system of audit, which will also include ensuring compliance of the
 - Due diligence in KYC norms.
 - Generation of exception reports
 - Trading in dormant client codes
 - Level of awareness of staff

9. Risk Management

- i) Univest follows a risk based approach for mitigation and management of any identified risk. Univest monitors its policies and may enhance policies if necessary.
- ii) Client due diligence is undertaken on a risk sensitive basis.

10. Transaction monitoring

- i) Univest has undertaken measures to understand the normal and standard activities of each client, to be able to understand deviations in transaction and activities.
- ii) Univest shall specifically note complex and unusually large transactions / patterns which appear to have no economic purpose.
- iii) Univest shall ensure retention of records as required under the PMLA and all other applicable laws.

11. Illiquid Securities

The Exchanges specifies a list of Illiquid Securities wherein higher due diligence is to be exercised by brokers. The list is displayed on the Univest website for the client's information. The trade pattern in such scrips by our clients is monitored. We may seek clarifications or justifications from the client in case of a high volume of trades in any scrip compared to the exchange volumes.

12. Employee Training

Univest has a policy for ongoing employee training so that the staffs of Univest are always aware of the provisions of AML and CFT procedures and amendments thereof. These training programmes are focused on our customer support staff, back office staff, compliance staff, risk management staff and staff dealing with new customers as it is very crucial that all those concerned fully understand the rationale behind these guidelines, obligations and requirements, implement them consistently and are sensitive to the risks of their systems being misused by unscrupulous elements. A register of attendance of participation in such education and training programs is maintained as records and kept secured.

INACTIVE ACCOUNT POLICY

Scope: To define procedures to ensure that no unauthorized trades are done in any INACTIVE client account.

Descriptions;

1. In case of trading account, the term inactive account refers to such account wherein any of below mentioned activities has not been carried out by client since last 24 (Twenty-Four) months:
 - i) Trading or participation in OFS/buy-back/Open Offer across any of the exchanges/segments of the exchanges through the same Member or
 - ii) Transaction in nature of applying/subscribing IPOs (where the IPO bid is successful & not canceled)/SGBs/Mutual Funds (lumpsum investment or investments through successful SIP installment payments) on the Mutual Fund platform of the stock exchanges through the same Member or
 - iii) Modification/updation of e-mail Id/Mobile Number/Address in KYC record of client through the same Member and the same has been uploaded to KRA to ensure Validated/Registered status.
2. The inactive accounts identified based on the above criteria shall be flagged as 'Inactive' by the Trading Member in the UCC database of all the respective Exchanges.
3. In case the client who is flagged as inactive seeks re-activation of the trading account, the Trading Member, while reactivating the said client, shall:
 - i) Mandatorily comply with In-Person Verification/Video In-Person Verification (IPV/VIPV) requirement specified in the SEBI Master Circular on KYC dated October 12, 2023.
 - ii) Seek confirmation from the client if there is any change in clients' basic details such as Address, Mobile number, Email ID, Bank/DP account, income, etc. as registered with the Member. In case of changes in any of the said details, the Member shall seek the updated details along with the necessary documents and update in its records as well in the UCC records of the respective Exchanges. In case of KRA Validated status or Registered status through same intermediary cases, the Trading Member may fetch the details along with the necessary documents from the KRA record and display the said details for confirmation of

the client and updation in its record. If there is change, then member shall update the UCC records of Exchanges as well as KRA. If client has confirmed that there is no change, the Member shall maintain the verifiable logs of the same.

iii) Notwithstanding anything contained above, in case a client seeks re-activation then member shall verify client status as per KRA and if the client status as per KRA is not validated (i.e. "On hold"/"Rejected"/"Registered" through other intermediary, etc.) then the member shall seek basic details like Address, Mobile number, Email ID, Bank/DP account, income, etc. along with the necessary documents as required by KRA and upload the same to KRA to ensure validated/registered status as per KRA before permitting client to trade on the Exchanges.

4. Once an inactive trading account is re-activated as per the aforesaid procedure, the computation of next 24 months for the purpose of identifying client as inactive in the subsequent period shall be considered from the date of last reactivation of trading account.
5. Member may send the communication/notification to the clients prior to flagging their trading account as inactive however such communication/notification should not ask the clients to trade in order to prevent their accounts from being flagged as inactive. Any non-compliance in this regard shall be viewed seriously and strict disciplinary actions against the Trading Member may be initiated.
6. The Trading Member shall not be required to upload the details of such inactive clients having NIL balances in daily submission of Holding Statement to the Exchange as prescribed in NSE Circular NSE/INSP/55380 dated January 25, 2023 and daily submission of Segregation and Monitoring of Collateral at Client level to Clearing Members/Clearing Corporations. However, details of the clients having funds or securities balances shall be reported (daily submission of Segregation and Monitoring of Collateral at Client level file reporting to Clearing Corporations in case of funds and daily submission of Holding Statement to the Exchange in case of securities) even if their UCC has been flagged as 'Inactive'.
7. Notwithstanding anything contained above, the Member shall also ensure adequate due diligence of the client on an ongoing basis (including, but not limited to, doing Re-KYC) in compliance with the provisions of the PMLA guidelines issued from time to time and in accordance with their respective KYC policies.
8. Return of Clients assets: Members are required to ensure that all client accounts are settled on monthly or quarterly basis (as per the client preferences) in the

manner prescribed from time to time. In case a member is unable to settle the client accounts due to non-availability of client's account details and non traceability of client, Members are advised to make all efforts to trace the clients to settle client account and maintain an audit trail for such efforts made for tracing such clients and settling their account. In case of receipt of any claims from such clients, members are advised to settle the accounts immediately and ensure that the payment/delivery is made to the respective clients only. Member shall ensure to keep such unsettled funds upstreamed to Clearing Corporations.

Any changes recommended by the exchanges, as well as any current or revised guidelines issued by NSDL, shall be incorporated into this policy and shall supersede all previous provisions.

BUYBACK/TAKEOVER

You will not be eligible to participate in buyback/takeovers if you have sold shares on or before the record date.

INVESTOR GRIEVANCES

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 grievances@unibrokers.in You can refer to the [grievances redressal mechanism](#) for more details.

ERROR ACCOUNT POLICY

1. The modification to the client code is to be done only in exceptional cases and not as a routine one.
2. The reason for modification has to be ascertained, analyzed and genuineness is to be established, and also its impact on the clients should be studied before the modification. If a voice recording is in practice, the same is to be studied.
3. Normally as a principle, we are permitted to change client codes of non-institutional clients only for the following objective criteria;

Error due to communication and/or punching or typing such that the original client code/name and the modified client code/name are similar to each other.

Modification within relatives (Relative for this purpose would mean 'Relative' as defined under the provisions of Companies Act, 2013).

4. For easy identification of error accounts, we register a fresh client code in the UCC database of the Exchange for the account which is classified as an error account.
5. We will inform the Exchange, by the end of the day, the reasons for the modification of client codes of non-institutional trades based on the aforesaid objective criteria.
6. Therefore it is imperative that the issue should be reported to the senior level Manager/compliance officer /Director and only with his approval, the modification should be carried after being satisfied that it is genuine, the same is required to be done to protect the interests of the client.
7. Hence the facility to modify the client codes should be available only at the Corporate Manager level and should not be given to the branches/franchise/authorized person .

POLICY FOR GSM SECURITIES (GRADED SURVEILLANCE MEASURE SECURITIES)

In GSM securities the Company would be Blocking of the scrip under GSM from grade I – grade VI. Exchanges have vide their respective circulars have provided for guidelines on GSM securities. The client can refer to the same in the case of the explanation required. Newly listed shares usually do not have a DPR and hence, the chances for rate fluctuations are higher. The dealing in newly listed shares will be restricted to the available credit balance after considering the Mark-to-Market (Mark-toMarket) levels.

Mark-to-Market Square-Off

At any given point in time, if the MTM level of the client breaches in the range of 70 to 80 % of his available Cash margin, the risk team would square off the complete/requisite positions of the client with or without intimating the clients.

For the sake of better understanding, the square off percentage of 70% or 80% is basically the threshold base limit and it should not be construed as exact 70% or 80% for square off. The position may get squared off at exact 70% or 80% or above the base threshold limit. Due to market extreme volatility, it may not be possible to monitor the square off limit from percentage (%) to percentage (%).

Also, in case the MTM square off is done, the residual fund if any will be blocked to trade till the client adds fresh funds to bring the overall MTM percentage sufficient below the threshold limit.

Further, the square-off will also be based on the extreme volatility in the market which may have a severe impact on the client and the company. The Company may or may not inform the client on the same in case of potential fluctuation. (SEBI guideline on closeout/square off)

All information mentioned here is subject to change at the discretion of our Risk management team.

DORMANT POLICY

Dormant account policy: The policy for a Dormant account has been framed out under the specific guidelines of the Prevention of Money Laundering Act (PMLA) for the safety and security of the investors as well as the financial market.

1. Introduction

The Dormant Account Policy lays down the procedure to be followed when instruction for debit/credit or buy/sell is received from an account which is Dormant. This policy gives a full description like the time period and method considered for terming an account Dormant and also various steps required to be adhered to strictly for re-activating such Dormant accounts.

2. Definition

An account shall be termed to be Dormant if it is inactive or remains non-operational by its holder at a stretch for a specified period of time. This specific period of time has been defined under the PMLA. Presently, this period is 6 (six) calendar months i.e. if an account is inactive for a minimum period of six calendar months, it will be classified as a dormant account.

3. Treatment of a Dormant account

All Dormant accounts will be treated in accordance with the policies prescribed under the PMLA. Accordingly, the dormant account will be frozen immediately

and the client will not be permitted to undertake any further transaction in such a dormant account. The procedure for a listing of dormant accounts is run once every month, preferably on the last day of the month.

4. Re-activation of a Dormant account

A Dormant account shall be re-activated only after undertaking the proper due-diligence process and fulfilling such conditions as may be deemed fit by the authorized person of the organization. As a practice, on receipt of an instruction from the client of a Dormant account, the authorized person has to appropriately verify the KYC of such clients as well as the authenticity of the instruction. The instruction is to be accepted only on the satisfaction of the above.

The above-stated policy may be modified at any time in accordance with the various rules, regulations, bye-laws, and guidelines that may be prescribed by SEBI, Exchange or any other competent authority or as per the internal policy of the organization from time to time. This policy for the dormant accounts is over and above the transaction monitoring in the dormant accounts as per the Anti-Money laundering policy of the organization.

SURVEILLANCE POLICY

National Stock Exchange of India Limited "NSE", BSE Limited "BSE" and Multi Commodity Exchange of India Limited "MCX", among others, have put in place a mechanism that will generate automated alerts for Trading Members whenever suspicious transactions are detected in their clients accounts.

The alerts will be generated in case of unusual changes in the trading pattern of the clients, sudden trading in dormant accounts as also in suspected cases of circular trading, 'pump-and-dump', front running" and "wash-sale " activities, etc.

In view of the above, the Company endeavors to frame this policy for surveillance of these alerts and the manner of disposal of the same.

The said surveillance and disposal of the alerts shall be done on the following grounds:

1. Receipt of Alerts from Exchanges / generated at members end.
2. The time frame for disposition of alerts and if there is any delay in disposition, the reason for the same shall be documented.
3. Suspicious / Manipulative activity identification and reporting process.
4. Record Maintenance. In this regard, in order to facilitate effective surveillance mechanisms at the Broker level, the Exchanges have derived following transactional alerts that would be downloaded to the trading members. This will facilitate the Company to effectively monitor the trading activity of its client.

CLIENT(S) INFORMATION

- The Company is required to carry out the Due Diligence of its client(s) on a continuous basis.
- The Company shall ensure that key KYC parameters are updated on a continuous basis as prescribed by SEBI and the latest information of the client is updated in the UCC database of the Exchange.
- Based on KYC and updated information the Company shall establish groups/ association amongst clients to identify multiple accounts / common account/ group of clients.
- The monitoring of the aforementioned alerts and disposal procedure shall be done within stipulated time.

ANALYSIS

In order to analyze the trading activity of the Client(s) / Group of Client(s) or scrips identified based on the above alerts, Company will:

1. Seek explanation from such identified Client(s) / Group of Client(s) for entering into such transactions.
2. Seek documentary evidence such as bank statement / Demat transaction statement or any other documents to satisfy itself:
 - In case of funds, Bank statements of the Client(s) / Group of Client(s) from which funds pay-in have been met, to be sought. In the case of securities, Demat account statements of the Client(s)/Group of Client(s) from which securities pay-in has been met, be sought

- The period for such statements may be at least +/- 15 days from the date of transactions to verify whether the funds/securities for the settlement of such trades actually belongs to the client for whom the trades were transacted.
- After analyzing the documentary evidence, the Company will record its observations for such identified transactions or Client(s)/Group of Client(s).
- In case adverse observations are recorded, the Company will report all such instances to the Exchange within stipulated time. The Company may seek an extension of the time period from the Exchange, wherever required.

MONITORING AND REPORTING

Receipt of Alerts from Exchanges / generated

- The time frame for disposition of alerts and if there is any delay in disposition, the reason for the same shall be documented.
- Suspicious / Manipulative activity identification and reporting process
- Record Maintenance
- A quarterly MIS shall be put up to the Board/Committee on the number of alerts pending at the beginning of the quarter, generated during the quarter, disposed-off during the quarter and pending at the end of the quarter. Reasons for pendency shall be discussed and appropriate action will be taken. The Board shall be apprised of any exception noticed during the disposition of alerts.
- The surveillance process shall be conducted under the overall supervision of the Compliance Officer
- The Compliance Officer will be responsible for all surveillance activities carried out by the Company and for the record maintenance and reporting of such activities.
- Based on facts and circumstances, the Company will exercise its independent judgment and will take adequate precautions.

POLICY FOR CLIENT CODE MODIFICATION

1. Objective: To frame the guidelines for modification to client codes post-trade execution and reporting of such Client Code Modifications.
2. Brief about Client Code Modification: Client Code Modification means modification/change of the client codes after the execution of trades. Stock Exchanges provide a facility to modify any client code after the trade has been executed to rectify any error or wrong data entry done by the dealers at the time of punching orders. However, such Client Code modification is subject to certain guidelines as to the time limit within which the client code modification is to be carried out, terminal/system on which such modifications can be done, etc.

The facility is mainly to provide a system for modification of client codes in case of genuine errors in punching / placing the orders. It is to be used as an exception and not a routine. To prevent misuse of the facility Stock Exchanges levy penalty/fine for all non-institutional client code modifications.

3. Scope of the Policy: This policy covers all the Client Code Modifications carried out / to be carried out in any of the client accounts controlled by HO, subject to the guidelines issued by the SEBI / Stock Exchanges from time to time, in any segment of any exchange for which Univest is a trading member.
4. Error Trades: "Error Trades" means the trades which will be modified / to be modified/allowed, to be modified subject to guidelines of the SEBI / Stock Exchanges and this policy.

For the purpose of this Policy, only the following types of trades shall be modified/allowed to be modified:

In case of NSE (Note: no consistent pattern in such modifications):

Client code/name and modified client code/name are similar to each other but such modifications are not repetitive.

In Case of BSE:

Punching error/typing error of client codes due to any genuine error or mistake in order entry, while punching the order.

Trade entered for the wrong client due to any miscommunication from the client / authorized representative of the client.

5. General Conditions:

- The facility for Client Code Modification can be used only in the case of Error Trade.
- The Client Code Modification shall be carried out only on the designated system and/or as per the process as may be prescribed by SEBI / Stock Exchange.

6. A place for Client Code Modification: Any Client Code Modification shall be subject to compliance of this policy, be carried out by RMS at HO of all the Error Trades happened in the Capital Market Segment of NSE and BSE.

7. Penalty: The penalty or fine, if any, levied on Uninvest for any wrong trade occurred due to any miscommunication from the client / authorized representative of the client shall be borne by the client.

POLICY ON HANDLING OF GOOD TILL CANCELED / GOOD TILL TRIGGERED ORDERS OF CLIENTS

1. Introduction

This document outlines the terms and conditions for using the Good-Till-Triggered (GTT) order feature provided by Uninvest Stock Broking Private Limited "Uninvest".

A GTT order enables you to set a buy or sell order for Cash and FNO (Futures and Options) at a predetermined price, valid for up to one year or until the order is triggered.

When the Trigger Price is hit, a limit order is placed with the exchange as per conditions set up by the user.

Orders with GTT validity can be placed both during the market hours as well as post market hours.

2. Trigger Validity

GTT orders are valid for up to one year or until specified trigger conditions are met and the order is triggered.

This type of order functions as a limit order with the product types set to Delivery in the Equity Cash segment on NSE & BSE. It also applies to Carry-forward orders in the Equity Derivatives segments on NSE/ BSE.

3. Types of GTT Orders

- Single Trigger (Single) Orders: Execute a predefined action when a single condition is met i.e trigger the order to exchange when either a stop loss or a target Price is hit as defined by the user.
- One Cancel Other (OCO) Orders: This feature applies to stocks already in your current holdings/ positions. You can set two trigger prices: one above the current market price as a target price and one below the current market price as a stop loss price in case of Buy Type of Orders. Similarly customer can set GTT targets less than LTP and Stoploss above LTP for sell cases.

4. Order Execution

- Upon reaching the specified trigger condition, the system will attempt to execute the order at the predefined price. However, execution is not guaranteed, especially in cases of market volatility or insufficient liquidity. The order will only be placed if the conditions match the user's set criteria.
- User Trigger Price will always be equal to the Price Set for Limit Order i.e the system will trigger the buy or sell order at the same price where limit order is placed.
- All the trigger prices you set will be monitored based on the stock's Last Traded Price (LTP).
- Brokerage rates and charges for GTT orders are the same as for regular transactions i.e respective for segments of Equity/ Derivatives. GTT orders will be settled like standard equity or

derivative trades.

5. Notifications

Users will receive requisite notifications on app/email/ phone as stipulated in the respective circulars issued by exchange / SEBI from time to time with respect to GTT orders and those circulars will form part of this policy. Users are responsible for monitoring their orders.

6. TERMS OF USE

GTT orders are subject to exchange norms, market conditions and internal policies. The company reserves the right to cancel or reject GTT orders especially in cases of regulatory requirements, or suspected fraudulent activities.

Orders might not be placed, could be rejected or cancelled, or may not be executed even if the Trigger Conditions are met, during the following market timings/conditions including but not limited to:

- When the trigger price is met, your GTT order will be sent to the Exchange for execution at the order price.
In case this order is not executed during market hours due to any reason, the GTT order has to be placed again.
- When placing GTT orders, ensure you have enough cash/fund and holdings in your trading account to trigger your GTTs. If your account lacks sufficient cash/fund or holdings, Uninvest may cancel your GTTs order (s) at their discretion.
- Each client can have a maximum of upto 200 pending GTTs at any given time.
- All GTTs will be cancelled 365 days after the request is placed if they have not been triggered according to the specified Trigger Conditions.
- If there is a corporate action such as split, bonus, dividend, merger, or delisting etc, affecting the stock price, Uninvest will not cancel any orders. It is the client's responsibility to modify / cancel orders as per will.

Clients with unexecuted GTT orders will be notified of upcoming

corporate actions, such as dividends, bonuses, and splits, at least one day before the ex-date. Clients should proactively review their GTT orders when corporate actions might affect them. It is the client's responsibility to modify such orders as per the revised values.

- If after the trigger price is met, the limit price for stock/ derivative contract is placed above the circuit limits defined for the day, the GTT will be triggered but the order may fail. This condition may not be applicable when the user defines only the Price (and not trigger price) during order placement.
- If the Last Traded Price (LTP) jumps above or opens beyond the trigger price, the order will be placed at the selected limit price.
- GTT orders cannot be placed at market price.
- GTT orders Stop loss & Target Price supporting Text is approx and may vary as per the type of order selected i.e Limit/ Market/ SL/ SL-M
- If a GTT order is triggered for an option contract that is not allowed for trading by UNIVEST, the order may be rejected.
- If you place a GTT order to sell securities from your demat account, you must authorize the holdings using a NSDL TPIN/ permitted function. If the TPIN/such details is not provided or are expired, the GTT order will be rejected when triggered.
A TPIN is not needed if you have a DDPI enabled with univest.
- If due to any reason, RMS square-off the positions for the client, the linked GTT to this order or symbol will not be cancelled and the onus to cancel/modify these lies on the client.
- GTTs for derivatives are valid only for the contract's duration and will expire after the contract ends/ expires.

7. User Responsibility

- Users must ensure they have sufficient funds in their account to cover the required margin for GTT orders. Users are also responsible for the accuracy of the order details they input, including the trigger price and order price.
- The Risk Management System (RMS) at Univest monitors client positions to ensure sufficient margins and compliance with Univest's risk management policies. It vets each order before execution, enforcing limits and possibly squaring off positions if

necessary. As a client, you must stay informed about Univest's risk management policies, terms, and procedures.

8. Risk Disclosure

Trading involves risks, and users should be aware that the market price may differ from the trigger price due to market conditions. The company does not guarantee order execution at the desired price.

GTT triggers rely on the live last traded price (LTP). Execution is not guaranteed with limit prices, as the LTP may change by the time the order is placed.

9. Support and Disputes

For any issues or disputes regarding GTT orders, users should contact customer support at support@unibrokers.in

The company will address disputes in accordance with its internal policies and applicable regulations.

10. No Liability for Non-Execution or Missed Opportunities

UNIVEST accepts no responsibility for any issues related to the use of the 'GTT order' feature. This includes, but is not limited to:

- a. Failure to execute any orders placed using the 'GTT order' feature, including any part of the order.
- b. Loss of potential trading opportunities due to non-execution of orders.
- c. Cancellations or failures to place orders as per the details mentioned above.
- d. Any other claims or issues arising from the use of the 'GTT order' feature.

By placing a GTT order, you acknowledge having read and understood the terms and conditions, which may be updated periodically. All GTT orders must comply with Exchange rules, regulatory guidelines, and the terms outlined in the Account Opening Form.

These terms and the GTT service may be updated or removed without notice. It's the client's responsibility to review them each time you use the GTT features.

POLICY - USE OF FACSIMILE/SCANNED SIGNATURES ON CONTRACT NOTE

This has reference to NSE circular Ref. No. NSE/INSP/32524 dated June 06, 2016, BSE notice 20160607-4 dated 7th June, 2016 and MCX SX circular Ref: MSEI/INSP/4281/2016 dated June 21, 2016 regarding policy implementation in relation to “use of facsimile/scanned signatures” on Contract Note.

Accordingly, Univest has framed below mentioned policy:

1. The physical contract note is being printed through a particular utility provided in the Univest Web portal.
2. We shall be using the facsimile/scanned signature of the signatories authorized to do so duly approved by board.
3. The signatures of the aforesaid signatories shall be captured in encrypted format and uploaded in the Univest web portal. The signature is encrypted in such a manner that it cannot be used on any other document other than contract note nor can anybody else use the signature other than those who are given the specific rights to use the signature
4. The “user rights” for this particular utility shall be limited to two officials at Univest corporate office. No branches / franchises shall be given any sort of access to the web portal utility of contract note printing.
5. In case of change in authorized signatory, the compliance team shall intimate the IT team to disable the facsimile/scanned signature till the time a new authorized signatory is appointed. Therefore, Univest shall appoint two authorized signatories whose scanned signature can be used on the contract note so that there is no hampering of the routine process in case there is change in authorized signatory.

The policy shall be amended from time to time under the directions of SEBI and Exchanges. All stakeholders shall ensure to adhere to the policy norms under all circumstances.

POLICY ON FACILITY OF VOLUNTARY FREEZING OF TRADING ACCOUNTS BY CLIENTS

This policy outlines the procedures for voluntary freezing of trading accounts for clients of Univest. It is in accordance with SEBI circular ref. no. SEBI/HO/MIRSD/POD1/P/CIR/2024/4 dated January 12, 2024, which mandates that stock exchanges provide a framework for Trading Members to facilitate voluntary freezing/blocking of online access to their trading accounts for their clients.

Framework for Voluntary Freezing of Online Access to Client's Trading Account

1. Clients can voluntarily freeze their trading accounts using the following methods:
 - Mobile Applications
 - Customer Service Desk: Email
- a. Mobile Application
 1. Go to my profile and click on "Account Freeze" chip on "Univest Demat" section to go to the freeze account home page.
 2. Read the instructions and click on "Freeze Account".
 3. Verify yourself by entering the OTP sent on your registered email and phone number.
 4. Once you are verified , your account freeze request will be submitted and your account will be frozen and in case of failure of request you will be directed to resubmit the same.
- b. Email
 1. Write to us at support@univest.in
 2. Note :To request an account freeze via mail, please use the subject "Freeze Account - <client code>". Other subjects will not be accepted. Also include contact details and reason to freeze your account.
 3. Our agent will connect with you to complete the freeze account process.

Once client verification is done by the Univest Agent , your account will be blocked. The blocked status and details will be sent to you via email.

Timelines for issuing acknowledgement as well as freezing / blocking of the online access of the trading account.

During market hours: Your account will be frozen within 15 minutes of receipt of the block instruction.

Post-market hours and 15 minutes prior to the start of the next trading session: Your account will be frozen before the start of the next trading session.

2. Handling Open Positions and Pending Orders

Upon receipt of a block request from your mobile app or through email, all pending orders will be canceled once the account has been frozen.

For open positions, you have the following options:

- a. Before account freeze- You can cancel/ square off your open positions through the app before submitting the freeze request .
- b. After account freeze- When the account has been frozen , you can request to us at support@unibrokers.in for the same. Note : The subject of the mail must be "Freeze query <Unique client code>" . Other subjects will not be accepted. Also include contact details and reason to freeze your account.

Before initiating the freeze request, instruct the customer service desk representative to square off your open MIS positions using the call and trade service.

Clients should ensure the following before initiating the freeze request:

RMS may square off MIS positions or not. Clients should verify this before making the request.

Clients should clearly communicate to the customer service desk about their position square off.

Note: Although the account will be blocked, any open positions will still be subject to RMS actions. You are responsible for fulfilling any margin shortfalls and bearing any resulting losses. Losses incurred while squaring off the open positions by calling the customer service desk representative will also be your responsibility.

3. Unfreeze/Unblocking Your Trading Account

Clients can unfreeze their accounts anytime, clients can contact our customer service desk at support@unibrokers.in or 9311247136 , and the account will be reactive within two working days.

Once your account is blocked or unblocked, an intimation will be sent within an hour to your registered email ID and mobile number.

Note: Investors may initiate a freeze/unfreeze request only once in a day.

4. Record Management

The company shall maintain a verifiable record of all such requests received for freezing/blocking of online access to trading accounts from clients as per the record management guidelines prescribed by the exchanges/regulator.

Pre-Funded Instruments Policy:

If the aggregate value of pre-funded instruments is Rs. 50,000/- or more from client per day per client, we may accept the instruments only if the same are accompanied by the name of the bank account holder and number of the bank account debited for the purpose, duly certified by the issuing bank.

The mode of certification may include the following either: a. Certificate from the issuing bank on its letterhead or on a plain paper with the seal of the issuing bank. b. Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument. c. Certified copy of the passbook/bank statement for the account debited to issue the instrument. d. Authentication of the bank account-number debited and name of the account holder by the issuing bank on the reverse of the instrument.

We also maintain an audit trail of the funds received through electronic fund transfers to ensure that the funds are received from their clients only.

Referral / Incentive Scheme Policy

BACKGROUND: This Policy is framed in accordance with NSE Circular No. NSE/INSP/43029, dated: December 26, 2019, NSE Circular No. NSE/INSP/43824, dated: March 11, 2020, BSE Circular No. 20191227-39, dated: December 26, 2019 and BSE Circular No. 20200311-57, dated: March 11, 2020; which states that all the trading members are required to have an appropriate policy framework w.r.t. quantum/ maximum limit on the incentive to be provided to the referring person.

OBJECTIVE OF THE POLICY: This policy is framed to deal with the quantum/ maximum limit on the incentive to be provided to the referring person. Univest Stock Broking Private Limited has adopted following guidelines while offering such incentives/ referral to the referring person:

1. For a particular referring person, the rate of the incentive will be flat (i.e. not slab based) and a single rate will be applied. We may apply different referral incentive rates across different referring person.
2. The referring person will not undertake any form of selling/ advisory activities in secondary market w.r.t securities and will not manage the portfolio of any person who is being referred. His/ her role will be strictly limited to "Referral" only.
3. The referred client will not be subjected to any kind of trade inducement by the referring person and it will be ensured that all instructions for placement of orders are obtained from the respective clients only.
4. All the details/ information pertaining to the client will be maintained confidentially and the same will not be disclosed to any person except as required under any law/ regulatory requirements or with the express written permission of the client.
5. All correspondences viz. Contract Notes, Daily Margin Statement, Statement of Accounts, Annual Global Transaction Statements etc. will be sent to the respective client only and under no circumstances will go to the referring person.
6. The referring person will not be allowed to conduct IPV/ OSV. However, referring persons who are under an obligation to undertake IPV/ OSV under their respective governing regulations may continue to do so.
7. Incentive amount will not be recovered from the client being referred and no obligation whatsoever will be cast on such client. There will be no financial transaction between the referred client and the referring person under the arrangement.

We will also comply with code of conduct prescribed for Stock Brokers under Regulation 9 of SEBI (Stock Brokers) Regulations, 1992 and all relevant Byelaws, Rules & Regulations and of SEBI/ Exchange w.r.t. sharing of Brokerage, Account

Opening, Inducement to Trade, Sales Practices, Orders Placement etc. issued from time to time.

This policy will be reviewed on an annual basis or as and when there are any changes introduced by any Regulatory Authority or as and when it is found necessary to change on account of Business needs and Risk Management Policy.

Annexure 1

For updated charge list, kindly refer this link <https://univest.in/pricing>