

# **Risk Management Policy**

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**Approved in Board Meeting of Ghanshyam Shares & Stock Brokers Pvt Ltd held on  
21<sup>st</sup> January, 2023.**

## **1. Introduction**

**The broad objective of the policy is:**

- To ensure objectivity and employ uniform measures in risk management to ensure safety and to maintain a consistent and proactive approach for managing risks across different client categories.

## **2. Exposure**

- The exposure can be in the Cash and Derivatives segment (which also includes Commodity & Currency segment). In the cash segment, exposure can be on purchase as well sell side. On sell side, share delivery obligation to the exchange can be considered as an exposure until actual delivery happens.
- The exposure can also be to the extent of the derivatives exposure and/ or of securities that are considered for margin purposes.
- In the best interest of the clients, GSSBPL may disallow or cap exposures in certain stocks and/or derivatives contracts time and again.
- Credit Committee approves exposures to clients beyond a stipulated exposure and / or specific exposure to a particular security. The Credit Committee comprises the MD, COO, and Risk Head.

## **3. Stock Categorization**

- Approved securities are bucketed into various categories based on profitability, market capitalization, promoter holding & pledge, PE ratio, daily volumes, exchange margins, risk perception etc. Haircuts are applied to various buckets basis categorization done. The Risk Head periodically reviews the categorization, haircuts, etc.

## **4. Multiples**

- For Cash and derivatives, the exposure is provided based on the margins as specified by regulators from time to time. In addition, GSSBPL may levy additional margin.
- Multiples can be defined as the quantum of exposure as defined by the exchange or GSSBPL that can be made available for a client in the Cash Segment based on margin provided. The multiples can vary depending on the category of Securities/Clients/Products.

## **5. Margins**

- For availing/maintaining exposure, client needs to have sufficient margins at all point in times. Margins can be in the form of funds or approved securities or any other form of margin as acceptable by GSSBPL after applying appropriate haircuts. GSSBPL reserves the right to change the approved securities list/quantum of haircut to be applied at its sole discretion. Clients need to maintain appropriate margins accordingly.

## **Risk Management Policy**

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- To provide collateral in the form of securities as margin, clients are required to pledge securities in favor of Ghanshyam Shares & Stock Brokers Pvt Ltd. Ghanshyam Shares & Stock Brokers Pvt Ltd may re-pledge the same to the Clearing Corporation.

### **6. Maintenance of margins:**

- Clients must verify and understand their exposure/debit outstanding at all times and shall maintain sufficient margin in their accounts. While a prior intimation (on best effort basis), with regards to margin short-fall shall be provided to the clients, GSSBPL also reserves its right to liquidate the open positions/collaterals to top up margins in extreme cases like insufficient margin balance, increased margin requirements/change in haircuts for specific securities/clearing the outstanding dues due to volatility or sudden change in market prices with immediate effect without providing prior notice.
- Client shall be required to maintain sufficient balance in the trading account to take delivery of the shares, failing which Ghanshyam Shares & Stock Brokers Pvt Ltd may square-off positions.
- Intraday square-off timings for any product(s) opted for may be changed without prior notice based on the discretion of our risk management department. Ghanshyam Shares & Stock Brokers Pvt Ltd will auto-square off all intraday positions in case the client doesn't square-off during the stipulated time. In such a scenario, the client shall not have any right or say to decide on the timing of closure of the open positions that needs to be closed and/or liquidation of shares and securities held in collateral/margin. Consequently, Ghanshyam Shares & Stock Brokers Pvt Ltd shall not be responsible for any trade related loss or damages arising out of such square-offs. All such square-off transactions shall have implied consent and authorization of the client in favor of Ghanshyam Shares & Stock Brokers Pvt Ltd.
- Exposure / limits shall be based on the margin provided by the client depending upon the segment / product in which client wants to trade. However, exposure / limits are dynamic in nature, subject to market conditions and at sole discretion of Ghanshyam Shares & Stock Brokers Pvt Ltd.
- Derivatives trading involves daily settlement of all positions including realized/unrealized loss on open positions and premium on options and any margins as required by the Exchanges and/or by Ghanshyam Shares & Stock Brokers Pvt Ltd.

In case of futures segment, all open positions are marked-to-market based on the closing level of the index/derivative contract. If the contract has moved against the client, then the client will be required to deposit the amount of loss (notional) resulting from such movement. Such amount will have to be paid within a stipulated time frame so as to ensure appropriate margins are maintained at all points in time.

In case of in-the-money long stock options (including potential in-the-money options), sufficient delivery margin needs to be maintained as regulated by exchange, failing which GSSBPL reserves its right to liquidate the open position/collaterals to top up margins.

- Positions that do not have sufficient funds/margins can be liquidated any time at the sole discretion of Ghanshyam Shares & Stock Brokers Pvt Ltd. While Ghanshyam Shares & Stock Brokers Pvt Ltd shall endeavor to provide a prior notice to clients before liquidating their securities, GSSBPL also reserves the right to liquidate securities

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## **Risk Management Policy**

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without any prior intimation in certain extreme scenarios like during times of extreme volatility, if the loss could be more than the funds/margins available in the client's 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. Fines levied by the exchange for short margin or any other reason will be payable by the client.

### **7. Security Order Qty & Value limits Single Order and Overall**

- In accordance to the regulatory guidelines and / or GSSBPL may place checks at single order quantity level, order value level and overall security quantity / value level, individually or combination thereof as may be applicable.

### **8. Securities in Ban Period in F&O segment**

- In compliance of rules laid down by Exchange for Securities in Ban Period in F&O segment, if a client creates position in securities which are in ban period, penalty will be levied for the same.

The list of securities in ban period is updated on NSE website on daily basis. The link is as below:

[https://www.nseindia.com/products/content/derivatives/equities/sec\\_ban.htm](https://www.nseindia.com/products/content/derivatives/equities/sec_ban.htm)

### **9. Clearing of Outstanding Ledger Balances:**

- Clients are expected to pay any debit balance outstanding in their ledger promptly. In case of non-payment, GSSBPL may not grant them further exposure and also may liquidate the securities available to recover such dues.
- In case client's securities received as pay-out are transferred to "Client Unpaid Securities Account" due to non-payment to Ghanshyam Shares & Stock Brokers Pvt Ltd in full, GSSBPL reserves the right to liquidate these securities based on various parameters including but not limited to liquidity, volatility or any single stock or set of stocks that has value close to the amount outstanding or based on any corporate action that is getting triggered in the stocks held or events that could trigger price fluctuations in any particular sector or a security.
- Ghanshyam Shares & Stock Brokers Pvt Ltd may at its sole discretion determine the time of sale and securities to be disposed of and/or which open position is/are to be liquidated/closed.

### **10. Large Debits with Single Scrip Concentration**

- For any client, if the outstanding debit exceeds a certain amount and concentration is in a particular security on account of buying done / collateral provided, GSSBPL may restrict the client from further buying or trading in that security. The client will be allowed to place only sell orders to reduce the debit.
- GSSBPL will take discretionary decision to allow the client to trade if he brings in fresh funds to clear the Debit or brings in different security as collaterals other than security

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## **Risk Management Policy**

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which forms the significant concentration. The client's position may be squared off if necessary to reduce the debit.

### **11. Margin Trading Facility**

- Clients availing Margin Trading Facility, should maintain margins as per GSSBPL Valuation or as per exchange's margin trading circular (MTF circular) whichever is higher and other terms agreed upon for availing such facility.
- Margin call/liquidation under margin trading facility may be initiated in case margins are not maintained as per GSSBPL Policy or as per exchange Margin Trading Circular, whichever is higher.
- Exposure towards stocks purchased under Margin Trading Facility and collateral kept in the forms of stocks shall be well diversified on account of script wise exposure and maximum client wise limit as set by GSSBPL from time to time.
- GSSBPL at its sole discretion reserves the right to withdraw the facility and ask for payments from the client or ask for higher margins depending on the extreme situations.
- Ghanshyam Shares & Stock Brokers Pvt Ltd may conduct Credit Appraisal for clients availing Margin Trading Facility beyond a certain exposure. The Credit Appraisal is conducted to gauge the credibility of the client, his sources of income, age, experience, repayment capacity, nature of employment and other assets are taken into account.

### **12. Suspension or closure of client account**

- On the request of the Client in writing, the client account can be suspended temporarily and/ or closed. In the event if the account is temporarily suspended, the same can be activated on the written request of the client only, GSSBPL may do so subject to Client accepting /adhering to conditions imposed by GSSBPL including but not limited to settlement of account / release of holds and / or other obligation.
- GSSBPL can withhold the payouts of Client and suspend his trading account due to his surveillance action or judicial or / and regulatory order/action requiring Client suspension.

### **13. Pay in of funds:**

- Clients can transfer funds into the Trading Account only from such bank accounts, which are registered with Ghanshyam Shares & Stock Brokers Pvt Ltd. Any transfer from a non-registered bank account shall not be considered and the client shall not get credit for such transfers.
- GSSBPL shall endeavor to account for all payments made by the client before liquidating clients' open positions/collaterals. However, it may be possible that due to volatility or sudden change in market prices, GSSBPL may not be able to account for all such payments made by the client on a real time basis.

## **Risk Management Policy**

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### **14. Pay in of Shares:**

- Clients need to settle their pay-in obligation only through their registered Demat account with GSSBPL. However, if a client settles his pay-in obligation through a non-registered Demat account then pay-out of funds for such shares may be kept on hold until client provides relevant documents for such unregistered accounts.

### **15. Exchange Trade Alerts**

- For each of the transactional alerts received from the Exchanges, appropriate analysis, monitoring and reporting is done as the process and guidelines defined by the Exchange.

### **16. Reporting to the Exchange(s)**

- In case the client is found indulging in suspicious activities, GSSBPL shall have the complete right to report such transactions to the Exchange(s). GSSBPL is not responsible for any loss incurred by the client if he/she is found guilty of unethical practices. GSSBPL will share all the required information to the regulator, exchange, or any other recognized regulatory body when a Client specific details is asked for. GSSBPL reserves the right to inform the Client based on the directions received by the fore mentioned regulatory body.

### **17. Escalation matrix:**

Level	Designation	Name	Address	Contact	Email
1	Customer Care	Sanjay Chauvan	404, 4th Floor PJ Tower, Dalal Street, Fort, Mumbai, 400001	9702357226	<a href="mailto:info@gssbpl.com">info@gssbpl.com</a>
2	Head of Customer Care	Durga Chandak	404, 4th Floor PJ Tower, Dalal Street, Fort, Mumbai, 400001	9987211044	<a href="mailto:info@gssbpl.com">info@gssbpl.com</a>
3	Compliance Officer	Ghanshyam Chandak	404, 4th Floor PJ Tower, Dalal Street, Fort, Mumbai, 400001	9833359920	<a href="mailto:gssbpl101@gmail.com">gssbpl101@gmail.com</a>
4	Managing Director	Ramavtar Chandak	404, 4th Floor PJ Tower, Dalal Street, Fort, Mumbai, 400001	9323450502	<a href="mailto:admin@gssbpl.com">admin@gssbpl.com</a>

18. Ghanshyam Shares & Stock Brokers Pvt Ltd is the Clearing Member (CM) for Custodian Participants (CP) who are Non Resident Indian (NRI) clients trading in derivatives segment. However, Ghanshyam Shares & Stock Brokers Pvt Ltd is not a Clearing Member for any other Trading Member (TM). Being a Clearing Member for Custodian Participants (CP), NSE Circular (Circular Ref No.: 24/2021 dated 13<sup>th</sup> August 2021) is applicable only for these clients and all policy & procedures mentioned in the Risk Management Policy is applicable to these clients as well.

## **Risk Management Policy**

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**Disclaimer: Ghanshyam Shares & Stock Brokers Pvt Ltd reserves right to edit, alter and or remove any information in whole or in part of the above policy. Clients are requested to refer any changes done in the policy from time to time.**

**Approved in Board Meeting of Ghanshyam Shares & Stock Brokers Pvt Ltd held on 21<sup>st</sup> January, 2023.**