

Elite Wealth Ltd
NSDL DP ID- IN301670, IN303989
CDSL DP ID- 12066800

‘The operation Manual and Process Flow’

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INTRODUCTION

This manual describes the procedures to be followed in the Depository Environment by the Elite Wealth Limited (EWL), who act as DP of National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL).

EWL is providing this information solely as a reference guide for Employees/other DP Member who deal with the clients and NSDL/CDSL. We request that each Employees/other DP Member follow the procedures described in this Manual. This Manual is meant for supplement DP internal operating procedures with respect to dealings with Client and NSDL/CDSL.

POLICY STATEMENTS

This Operation Manual and process Flow (the 'Manual') has been prepared for Depository Operation for this organization. This manual is conformity with NSDL/CDSL Stipulations.

The In charge of Depository Operation shall keep this manual in his custody and have the right to allow any other person to access this manual. However, this operation manual is open for inspection by all persons.

The manual shall be open for comments/suggestions for its improvement, modification etc. by NSDL inspection team, Internal Auditor(s)/Concurrent Auditor(s).

Explanatory Statement;

The words/phrases/ expressions used in this manual shall have same meaning as given/used in normal Depository – Participant operation of NSDL/CDSL.

OPERATIONAL HIERARCHY

The top to bottom set of levels is as follows:

The Board of Directors: It is the highest level of decision-making body of the company. It was constituted as per companies Act, 1956 and Article of Association of the Company. It has power to delegate, vary, alter, modify from time, the management of day-to-day affairs to Executive Directors/Directors/ Compliance Officer(s) for DP Operations etc.

The Managing Director /Whole time Directors: The person authorized in this category shall have right to manage the day-to-day affairs of DP. He can appoint any person below its rank at operating levels, on such term/ conditions as he deems fit. He has power to shift, change or vary the duties/responsibilities of his subordinates to facilitate the DP operations.

The person in this category shall have right to alter structure of 'DP Operation' at operation level in any form by merging, expending etc, in order to facilitate the smooth functioning of the DP operation.

The person in this category shall have emergency power consistent with statutes, in guiding DP operations.

The name of person and designation in this category is given in Annexure- I

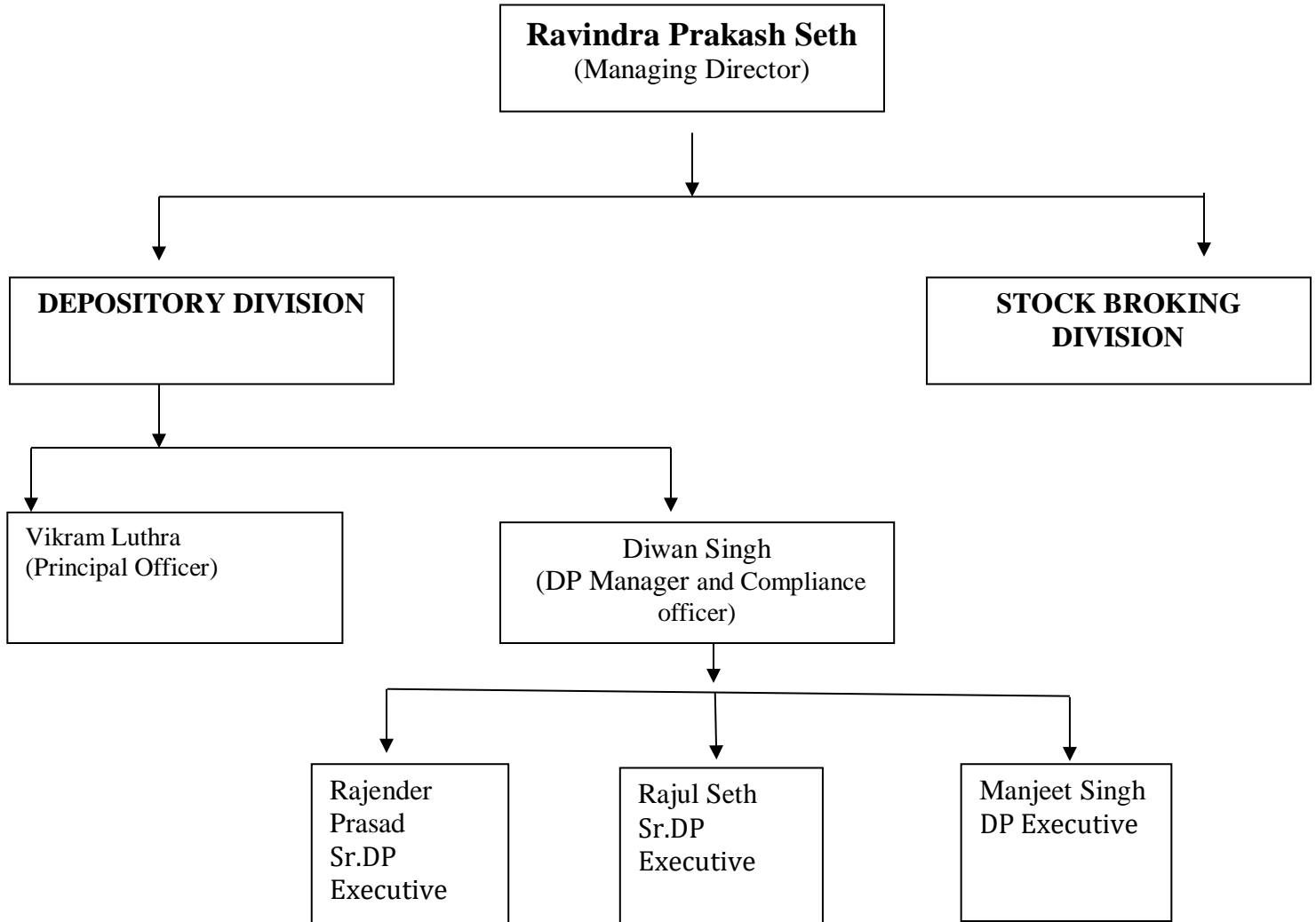
Compliance officer:

- a) The person who oversees all the compliance related issue prescribes by NSDL, CDSL & SEBI.
- b) The person who guide all the DP Staff in respect of DP operation & also whether all the operation are carried out smoothly and in conformity with the rules & regulation/ Bye laws prescribe by NSDL/CDSL/SEBI
- c) The person who correspondences with NSDL, CDSL, SEBI and others regulatory body in respect of any issue related to DP operations, compliances & Investor grievance redressal.
- d) The person who authorized to interact with other parties on behalf of organization.
- e) The person who is responsible for handling any inspection or Audit conducted by NSDL, CDSL, SEBI as well as for internal audit.

The name of person and designation in this category is given in Annexure- I

NCFM/NISM: It includes the qualified person, appointed as per NSDL/CDSL stipulation

Elite Wealth Ltd (EWL)
Organizational Chart for Depository Division



OPERATION LEVELS

Operation Levels: This includes the following sub level;

- a) Level-1 (the L-1)
- b) Level-2 (the L-2)
- c) Level-3 (the L-3)

Level- 1:

This level is responsible for the following:

- Entertaining the clients, distribution of various forms, information regarding pendency of orders, confirmation, failed instruction etc.
- Accepting client's instructions, Demat, Remat Request etc. and capturing thereof.
- Checking the Signature of clients at first level in case of DIS, Demat, Remat etc
- Accepting the payment under various categories
- Initial Verification
- Recovery of pending dues from the clients
- Checking the KYC forms
- Record keeping

Level-2

The following roles /responsibility shall be handled at this level;

- Capturing the Delivery Instruction Slip, Demat Request Forms and Account Opening forms.
- Verification of customer's orders /signatures / balance of securities.
- Back office control including blocking of instruction slips.
- Processing of demat / re-mat request etc
- Issuance and Re-issuance of DIS, other instructions slip.
- Responsible for KYC compliances.
- Maintaining the DIS stock register
- Issuance of statements of holding/transaction
- Correspondences with client regarding pendency of their orders, information etc.

- Correspondences with client regarding pending dues.
- Maintenance of various registers/records necessary for DP purposes.
- Client Accounting, Monthly billing .
- Speed-e related work
- Checking the KRA status
- Uploading the KYC documents of new account as well as old in KRA systems
- Maintaining the KRA Records and Dispatched proofs.

Level-3:

The following roles/ responsibility shall be handled at this level;

- Final verification and release of customer's order.
- Responsible for KYC compliance at the highest level, particularly
'In person verification'
- Handling of the pay-in/pay-out of securities.
- Taking back up of day's data and their security.
- Maintenance of software / hardware and their technical up- gradation.
- Handling of NSDL/CDSL inspections.
- Liasoning with Auditors' and NSDL/CDSL.
- Investor's grievances.
- Responsible for keeping check on high value transactions.
- Direct monitoring of services at L-2, L-1
- Process of analysis for compliance of Anti-Money Laundering procedures.
- KRA activities

The name of person(s) and designation(s) at level is given in Annexure- I

DUTIES AND RESPONSIBILITIES

The person (s) designated shall supervise the entire DP operation in conformity with the NSDL/CDSL guidelines and more particularly look after the following roles/ responsibilities:

- To super vise the entire DP process at operation level.
- Take steps to implement the policy matters
- Suggest the measure to improve the quality of service.
- Such other work as may be assigned to him by his superior.

The name and designation(s) of person(s) for this level is given in Annexure- I

PROCEDURE FOR ANTI-MONEY LAUNDERING

The following Transactions come under the preview of ' ANTI-MONEY LAUNDERING '

1. All cash transactions of the value of more than rupees ten lakh or its equivalent in foreign currency;
2. All series of cash transactions integrally connected to each other, which have been valued below Rs.10 lakhs or its equivalent in foreign currency (excluding individual transactions below Rs.50,000/- in the reporting) where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds Rs.10 lakhs.;
3. All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place;
4. All suspicious transactions whether or not made in cash and by way of as mentioned in the Rules.

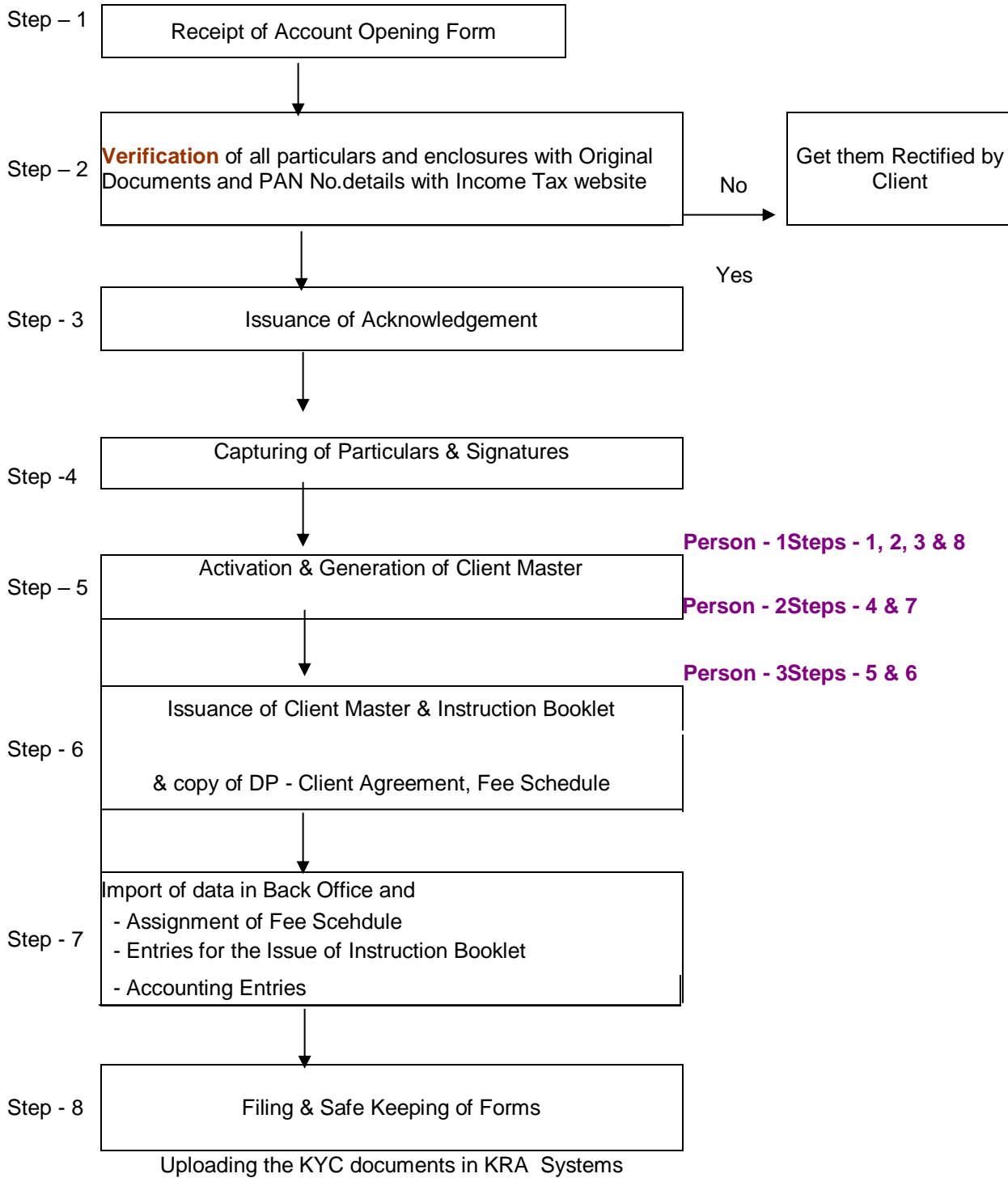
We maintain and preserve the following information in respect of transactions referred to in Rule 3:

1. The nature of the transactions;
2. The amount of the transaction and the currency in which it was denominated;
3. The date on which the transaction was conducted; and
4. The parties to the transaction.

Process Flow

(A)

Account Opening Procedures



Step-9-

Verification of Account Opening Form :

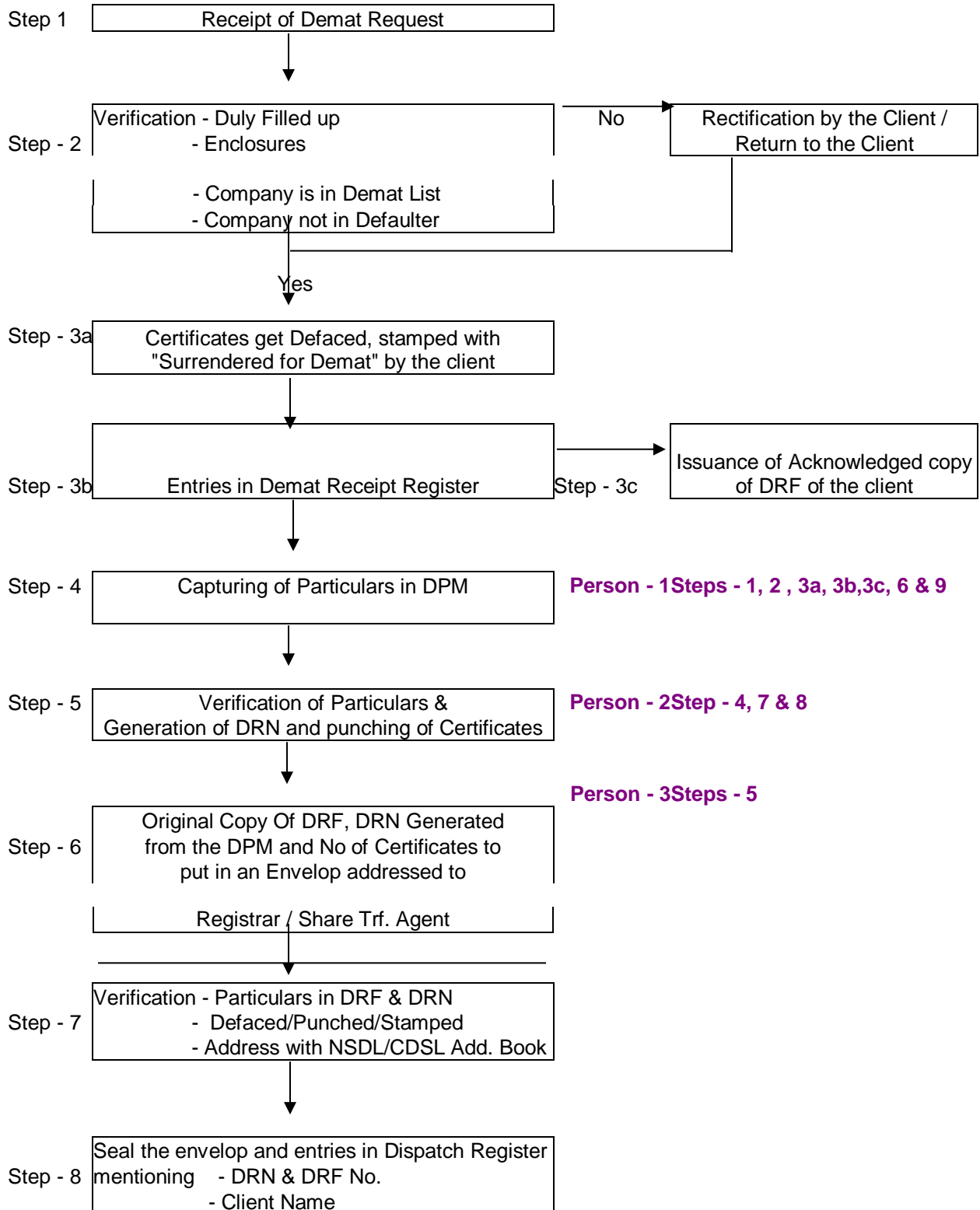
- All the particulars are duly Filled Up and all the corrections are duly initialed
 - Copy of Pan Card is attached, verified with original and particulars are verified from Income Tax website
 - Identity Proof (Pan Card, Passport, Voter Card, Driving Licence) attached and verified with original
 - Address Proof (Ration Card, Electricity Bill, Telephone Bill etc,) attached and verified with original
 - Bank Particulars are duly Filled Up and proof of Bank Particulars and MICR No is submitted
 - Nomination, if any, has been made in Annexure JA format and photograph and signatures of nominee obtained
- Form should be forwarded for capturing only if All the formalities are complete

Activation of New A/c

- All the particulars duly punched
- Address punched as per NSDL/CDSL Norms
- Signatures Duly Captured
- Pan No Details are duly verified

(B)

Demat Request Processing Procedures



- Client Id
- Scrip Name
- No of Shares
- Date of Dispatch
- Dispatch No. & POD No.

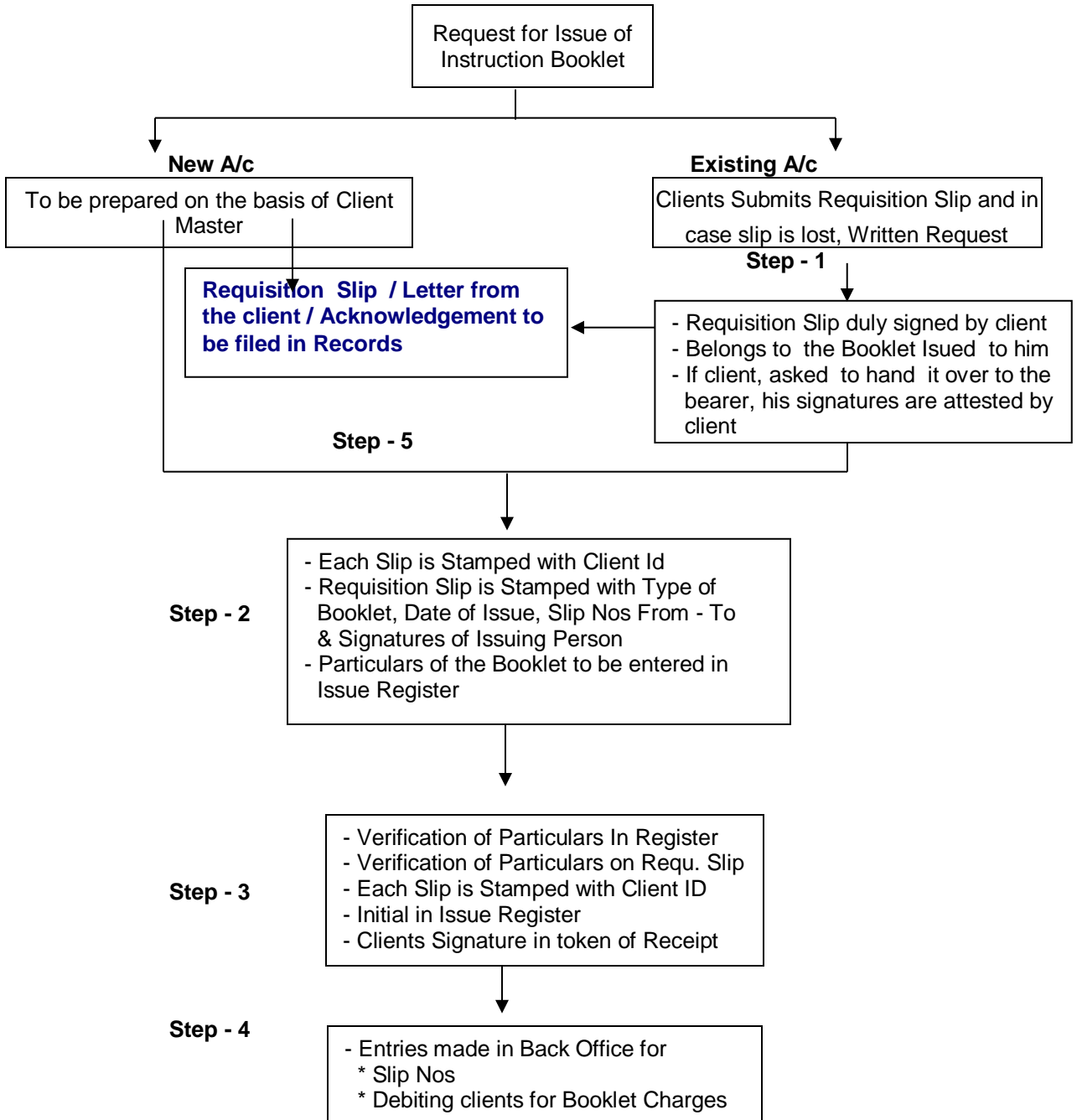


Step - 9

- Record Keeping :
- DRN and DRFs
 - POD with address written on it

(C)

Issue of Instruction Booklet



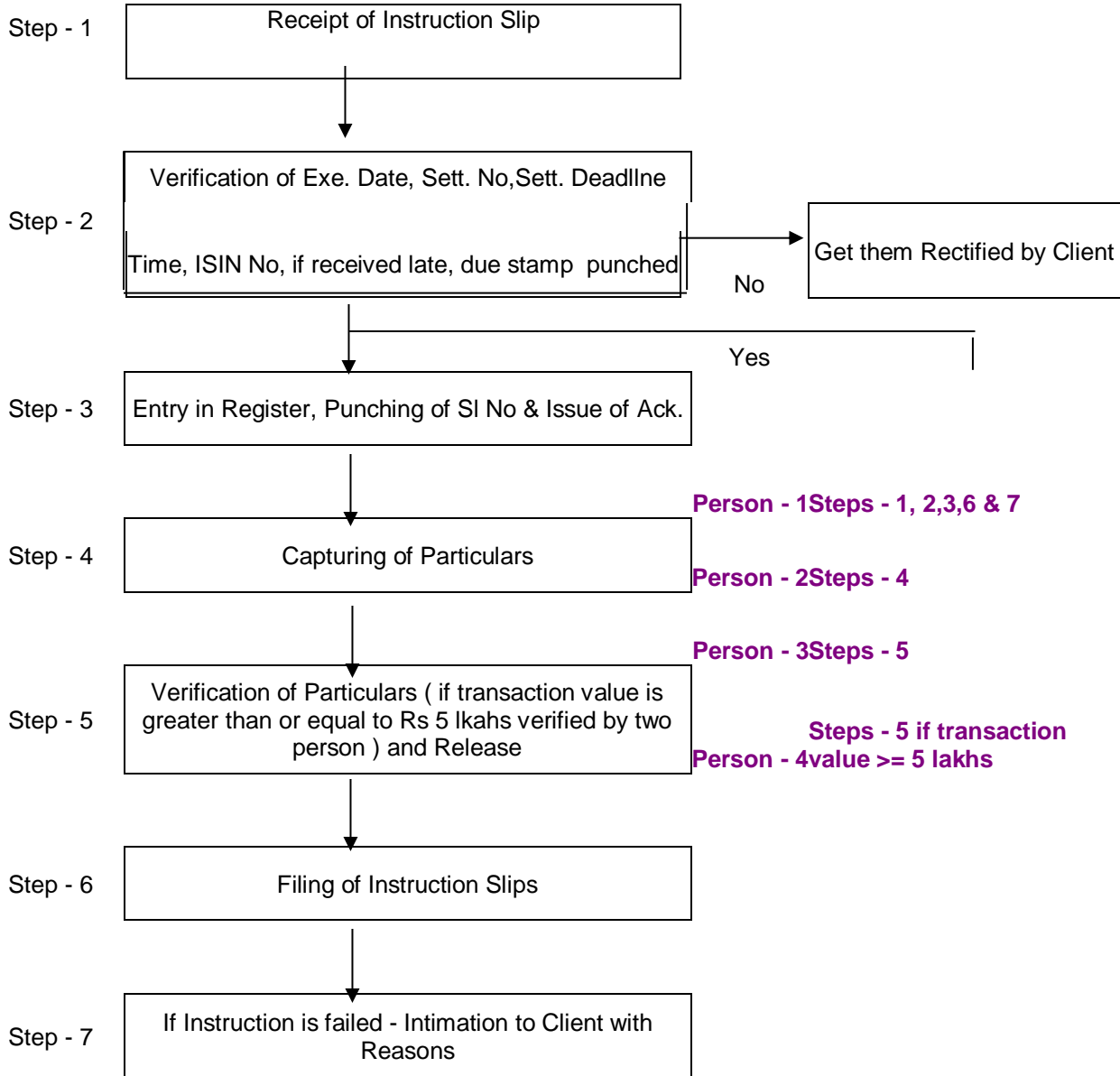
Person - 1 Steps - 1 & 3

Person - 2 Step - 4

Person - 4 Step - 2 & 5

(D)

Settlements



Annexure- I

Person(s) occupying various positions in DP operations:

S.No	Name of Person	Designations	Level
1	Mr. Ravindra Prakash Seth	Whole time Director cum Managing Director	
2	Mr Vikram Luthra	Principal Officer	
3	Mr. Diwan Singh	Manager DP & Compliance Officer	NISM/L-3
4	Mr. Rajul Seth	Sr. DP Executive	NISM/L-3
5	Mr. Rajendra Prasad	Sr. DP Executive	NISM/L-1
6	Mr. Manjeet Singh	DP Executive	NISM/L-1