SMK
Maximizes your money value

SMK SHARES AND STOCK BROKING PVT. LTD.

Member : Bombay Stock Exchange Ltd., Clearing No.: 777
Member : National Stock Exchange of India Ltd., Clearing No.: 09860

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EMPOWERING INVESTORS
A SEBI Initiative

CIN:U99999MH1997PTC112090

SMK SHARES AND STOCK BROKING PVT LTD

MANDATORY

PLANS & POLICIES FOR RISK MANAGEMENT

By SMK Shares and Stock Broking Private Limited

15th JUNE 2025 Reviewed 15th DEC 2025

POLICIES AND PROCEDURES APPLICABLE TO CLIENTS OF SMK SHARES AND STOCK BROKING PRIVATE LIMITED

1. CONDITIONS UNDER WHICH CLIENT MAY NOT BE ALLOWED TO TAKE FURTHER POSITIONS OR BROKER MAY CLOSE EXISTING POSITIONS OF CLIENT

In addition to the conditions as provided under the policy of right to sell securities and close out client's open position as detailed in point 4 above, SMK SHARES AND STOCK BROKING PRIVATE LIMITED shall have the right to refuse to execute trades/allow the client to take further positions and / or close out the existing positions of client under following circumstances:

a. As a result of any Regulatory directive / restriction;
b. Non-receipt of funds / securities and / or bouncing of cheque received from the client towards the obligations/ margin/ ledger balances;
c. Due to technical reasons;
d. securities breaching the limits specified by the Exchanges/regulators from time to time
e. in case of failure to meet margin including mark to market margins by the client;
f. In case securities to be transacted by client are not in dematerialized form
g. Any other conditions as may be specified by SMK SHARES AND STOCK BROKING PRIVATE LIMITED from time to time in view of market conditions, regulatory requirements, internal policies etc and risk management system;
h. Due to any force majeure event beyond the control of SMK SHARES AND STOCK BROKING PRIVATE LIMITED

SMK SHARES AND STOCK BROKING PRIVATE LIMITED shall not be responsible for any loss incurred and the client shall indemnify SMK SHARES AND STOCK BROKING PRIVATE LIMITED in this regard.

2. TEMPORARILY SUSPENDING OR CLOSING OF CLIENT'S ACCOUNT AT THE CLIENT'S REQUEST

SMK SHARES AND STOCK BROKING PRIVATE LIMITED may suspend or close the trading account of the client pursuant to SEBI or any other Regulatory directive for such period as may be prescribed by the respective Regulator. SMK SHARES AND STOCK BROKING PRIVATE LIMITED may further at its sole discretion and with/ without information to the CLIENT, prohibit or restrict or block the CLIENT's access to the use of the web site or related services and the CLIENT's ability to trade due to market conditions and other internal policies including policy with respect to prevention of money laundering.

Client can initiate temporary suspension / closure of its account at any time by giving a request to SMK SHARES AND STOCK BROKING PVT.LTD. in writing 15 days in advance. However, such suspension / closure will be affected subject to clearance of all dues and settlement obligations by the client.

Trades in the account of the client during the period of such temporary suspension shall not be permitted.

Notwithstanding any such suspension / closure, all rights, liabilities and obligations of the parties arising out of or in respect of transactions entered into prior to such closure / suspension shall continue to subsist and binding on the client.

In case the account has been temporarily suspended at the request of the client, the account shall be reactivated only on submission of a written request for reactivation by the client.

3. DEREGISTRATION OF A CLIENT

Deregistration of the client /Termination shall be at the sole discretion of SMK SHARES AND STOCK BROKING PVT.LTD.. SMK SHARES AND STOCK BROKING PVT.LTD. may deregister the client if the client breaches the terms and conditions of the member–client agreement or provides any false information or declarations. Further SMK SHARES AND STOCK BROKING PVT.LTD. may deregister the client if the client is suspected to be involved in any activities in violation of applicable Rules and Regulations. Further the client may be deregistered due to any Regulatory directive, market conditions and other internal policies of SMK SHARES AND STOCK BROKING PVT.LTD. including policy with respect to prevention of money laundering. Such deregistration/termination shall not effect the rights and liabilities of the parties in respect of the transactions executed before the date of such deregistration/termination.

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4. TREATMENT OF INACTIVE ACCOUNTS

In case the Trading and / or demat account of the client is not operated by the client for a continuous period of SIX months the same will be considered to be 'Inactive Account'. Such Inactive account will be blocked for further transactions by the client. The client will have to submit following documents / confirmation, for re-activation of such blocked account:

1. Call the investor service desk identifying himself (through validation questions) and requesting for activation of account for placing orders / transacting in the account; OR
2. Client can give the duly signed request in writing at offices of SMK Shares and Stock Broking Pvt.Ltd. Ltd.; OR
3. By placing request for re-activation of account through the email request.

During the blocked period if there is any debit / dues to SMK Shares and Stock Broking Pvt.Ltd. Ltd in client's account, SMK SHARES AND STOCK BROKING PVT.LTD. shall have the authority to liquidate the client's position to the required extent during the block period.

During the block period if any corporate actions or pay-outs are due for return to the client, the same will be affected / returned by SMK SHARES AND STOCK BROKING PVT.LTD. to the client's account.

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5. Financial Details of the Clients

SMK Shares and Stock Broking Pvt.Ltd.will continue to ask for regular updates of the Financial details, Annual Reports, IT Returns etc of the Retail Clients to keep a check of the following :

1) The Retail Clients doesnot trade more than his Networth Value
2) The Source of Funds which have been brought by the retail clients for trading in Securities.

This will just enable to support SMK Shares and Stock Broking Pvt.Ltd. To abide by rules and laws of PMLA Act.

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6. Trading for Debbarred Entities

SMK Shares and Stock Broking Pvt.Ltd.has updated their Back Office System Software, where in reqular list of Debarred Entities disclosed by SEBI through NSE Circulars, can be uploaded directly into the system. The System has an automated matching concept to match the PAN of the list with the PAN incorporated to the Client Codes in the system and give an exception report. Also the system will give an POP UP if any of those PAN are inserted by the user into the System while fres Registration of Clients if Such PAN Matches with the LIST of Debbared Entities. SMK Shares and Stock Broking Pvt.Ltd. Will regularly upload such list into the system once retail client business is started.

The above policies and procedures are subject to change / updation by SMK SHARES AND STOCK BROKING PVT.LTD. from time to time. The updated policies and procedures of SMK SHARES AND STOCK BROKING PVT.LTD. shall be informed to the client on timely basis.

These are the RMS policies prepared for adherence, however kindly note that SMK Shares and Stock Broking Pvt.Ltd. is purely into Proprietary trading and Own investments

For SMK Shares and Stock Broking Pvt.Ltd.

Dinesh Shyamlal Khemka
(Director)

SMK SHARES AND STOCK BROKING PVT. LTD. MUMBAI