

GENERAL POLICY FOR EQUITY BUSINESS
PARTNERS

Payout

- Monthly brokerage Payout will be made every 5th/6th of next month.
- Payouts that are not processed due to debit hold, compliance action, or pending bank details will be processed on a weekly basis each Wednesday. Cut off date for consideration for issue resolution is each Tuesday. For example, issues that are resolved on Tuesday will be considered for payout on Wednesday. Any issue resolved after Tuesday will be processed next Wednesday.
- Please ensure that the banking details are updated on ACML Connect.

Client Naked Debit:

- Brokerage equivalent to Naked debit in the client's account will be kept on hold on a Monthly basis. In case the naked debit is cleared later on then it will be processed in Weekly Payout.
- All the naked debit as of March 31 has to be cleared by May 31 and naked debit as Sept 30 has to be cleared by Nov 30. Post the due dates, it will be cleared by debiting in AP or Referral Partner's accounts.

Compliance

- No business partner is allowed to engage in services related to advisory, portfolio management, etc. Any Business Partner involved in any such activity can lead to strict action from ACML. Any loss occurring to clients because of such practices, the Business Partner will be personally liable to make good on such losses and the Company will take all action including legal action if required against such business partner.
- The AP shouldn't be dealing in any of the competitor's business. Also, the same premises should not be used to do competitor business. Any such instance will be treated as a serious violation and can even lead to the termination of AP.
- Pre-recording of trade via ACML Calling System - UCS is mandatory for all APs. In case of repeated non availability of recording then the terminal will be blocked and action will be taken against the AP.
- If a terminal is found to be used in any place other than the registered place then a penalty of a minimum of Rs. 50,000 will be levied
- If the recording is being done on the local system then it has to be shared within 5 days otherwise the terminal will be blocked.
- All the violations mentioned here or communicated in the future related to compliance policies will be treated with strict action which includes monetary penalty, clawback of

brokerage, clawback of incentives of any type, legal and police complaints, and termination of a business partner.

- ACML in any case of non-compliance can terminate or block the business partner code and also can take action such as conversion of client codes of the Business Partner as direct codes of ACML.

Marketing Compliance

- Business Partners are allowed to do social media and other print media marketing only after prior approval from the ACML Compliance team.
- Any website created by a business partner has to be updated with the ACML Compliance team and their approval is mandatory to operate the website.
- Any instance that breaches the above-mandated guidelines will attract a penalty of Rs. 1 Lakh per instance which can be increased based on the seriousness of the breach.
- In case any communication breaches the SEBI or exchange guidelines while using social media handles then strict action will be taken against the business partner.

Client Complaints

- Any client complaint about unauthorized trade, wrong commitment, trade by asking for client credentials, etc. will attract penalty as mentioned in Annexure 1 in addition to losses incurred by the client.
- Any repeated complaints against such a person can lead to stricter action including termination of Business Partner.
- Police complaints and additional recovery to be made for any penalty levied by exchange
- All the violations mentioned here or communicated in the future related to compliance policies will be treated with strict action which includes Blocking new KYC for a certain period, monetary penalty, clawback of brokerage, clawback of incentives of any type, legal and police complaints, and termination of a business partner.
- Additional measures can be taken where the brokerage rate charged to existing and new clients will be reduced to :
 - .02% in Intraday and Futures
 - .20% in delivery
 - Rs. 10 per lot in NSE Options, NSE Currency, BSE options and BSE Currency
 - Rs. 20 per lot in MCX options

Other Terms:

- Rude behavior with clients or employees is not permitted and in case any business partner is found doing this or any complaint is received then strict action will be taken against such person.
- If more than 2 complaints are received and they are unresolved for more than 3 days TAT then client brokerages will be reduced to:
 - .02% in Intraday and Futures

- .20% in delivery
- Rs 10 per lot in NSE Options, NSE Currency, BSE options and BSE Currency
- Rs. 20 per lot in MCX options
- Brokerage of only registered segments will be released
- For clients where brokerage is more than 20% of capital invested in a day or more than 40% in a month then revenue sharing will be limited to 40% only and that too after client confirmation.

PENALTIES FOR GRIEVANCES:

Sr. No.	Particulars of complaint	Penalty (In Rupees)
1.	Unauthorised Trades	Trade without pre-trade confirmation or trade executed from client account using client user id & password
	Once	a) Partner's entire payout and deposit will be confiscated b) Partner will be terminated
2.	User id & Password Taken	For trading without client's knowledge
	Once	Partner's entire payout and deposit will be confiscated Partner will be terminated
3.	Excess Brokerage	Brokerage levied to the client to which he/she was not aware.
	Complaint for No brokerage confirmation	5000/- Penalty and resolution of the complaint by AP by giving credit of excess brokerage to the client and resolution of the complaint.
	Trades execution only with the intent of Brokerage	
	Once in a quarter	5000/- Penalty

	Twice in a quarter	a) 10,000/- Penalty for each complaint b) Resolution of the complaint by giving credit of excess brokerage.
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5.	Trade tips , calls provided without any authority	<p>i. 5000/- Penalty for each complaint along with the resolution of the complaint.</p> <p>ii. If complaint received more than 3 times then the penalty will be 10,000/- per complaint along with the resolution of the complaint by AP.</p> <p>If still complaints are there disciplinary action against AP along with termination if required.</p>
6.	Any other compliance	
	a) Non availability of Pre trade confirmation	i. 5,000/- Penalty for each such instance
	b) Manipulation or improper Pre-trade confirmation or c) Editing of documents	ii. 5,000/- Penalty for each such instance
7.	Any Other Grievance Issue	iii. As per the discretion of management

GRIEVANCES TAT FOR RESOLUTION OF COMPLAINTS:

Sr. No.	Particulars	TAT for closure	Penalty to AP IF
1.	First Level Grievance	7 DAYS	-
		If pending for more than 7 Days by AP	Rs. 500/- per day for each complaint
		If still pending more than 15 days	Disciplinary action against AP
		If pending due to reason beyond control	Escalation to compliance and compliance team will decide the further action including the penalty and disciplinary action against AP
2.	Second Level Grievance Namely SEBI, BSE, NSE etc.	5 Days from receipt of details by Compliance	Rs. 2500/- per day for each complaint along with disciplinary action for non-resolution which includes termination, payout hold, additional penal provisions etc.