



## Internal Control Policy

Entity Name	Manog Securities Pvt Ltd
SEBI Registration No.	INZ000278434
Compliance Officer	Pawan Pratap Singh
Date of Adoption	28-JAN-2026

### 1. Governance Structure

Role	Responsibility	Reporting To
Board of Directors	Overall policy approval; half-yearly review of compliance submissions; annual audit findings	N/A
Compliance Officer: Pawan Pratap Singh	Day-to-day compliance, regulatory filings, internal audit coordination, SCORES management, staff training	Board / Partners
Senior Dealers / Operations Staff	Execution of control policies; password security; terminal access control	Compliance Officer
Internal Auditor (Independent CA/CS/CMA)	Half-yearly audit; direct reporting to Board on findings	Board / Partners

### 2. Client Registration and Account Opening

#### 2.1 Mandatory Documents — SEBI Master Circular Para 21

KYC form (Part I of Account Opening Form — CERSAI/SEBI format)

Trading account additional information form (Part II — Annexure-8 format)

- Rights & Obligations document (Annexure-9)
- Uniform Risk Disclosure Document (Annexure-10)
- Guidance Note — Do's and Don'ts (Annexure-11)
- Most Important Terms & Conditions (MITC) — mandatory for all clients from April 1, 2024
- Tariff sheet — all charges including brokerage
- Nomination choice: Nomination Form (Annexure-12) OR Opt-Out Declaration (Annexure-13) — nomination is voluntary
- DDPI — Demat Debit and Pledge Instruction (Annexure-14) — replaces PoA for securities delivery
- In-Person Verification (IPV) — in person or V-KYC

## 2.2 Nomination — Fortnightly Reminder

Fortnightly email + SMS to all UCCs where nomination choice has not been captured

## 3. Order Receipt and Execution

All orders through Exchange-approved channels: online portal, mobile app, telephone (**voice recording mandatory — SEBI para 28**), in-person

All orders to pass through RMS pre-trade controls before release to Exchange

Electronic contract note issued by end of trading day — digitally signed or email-confirmed

Daily margin statement to clients; quarterly statement of accounts

## 4. Running Account Settlement — SEBI Para 23.1

Clients choose monthly or quarterly settlement at account opening

Settlement on dates in **Exchange-issued annual running account settlement calendar**

Mode: **NEFT/RTGS only**. Physical cheque only if electronic payment fails/is returned

Client receives SMS + email intimation with transaction reference and date on settlement date

**T+1 settlement** for equity cash segment; segment-specific cycles for derivatives and commodities

## 5. DDPI and Securities Delivery — SEBI Para 37

DDPI (Annexure-14 format) replaces Power of Attorney for all securities delivery authorisation

DDPI scope: limited to (a) settlement of trade obligations; (b) margin pledge/re-pledge only

Existing PoA authorisations to be updated to DDPI format

## 6. Grievance Redressal — SCORES, ODR, Investor Charter

Dedicated grievance email ID: **[grievance@manogsecurities.com](mailto:grievance@manogsecurities.com)**— displayed on website and all client communications

SCORES complaints resolved within **15 working days** of receipt

ODR (Online Dispute Resolution) portal made available to clients for dispute resolution

Complaint data disclosed on Firm's website by **7th of each succeeding month** — Annexure-38 format

Investor Charter published on website — Annexure-37 of SEBI Master Circular

## 7. Internal Audit

Half-yearly audit by independent CA/CS/CMA — no conflict of interest with the Firm

Apr-Sep period: report due by **November 30**

Oct-Mar period: report due by **May 31**

Auditor rotation: individual — max 5 years; firm — max 10 years; 5-year cooling-off after each

## 8. Compliance Submissions Calendar

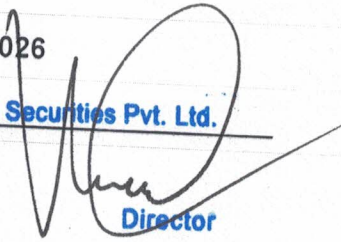
Submission	Due Date	To
Internal Audit Report (Apr-Sep)	November 30	Exchange / Clearing Corporation
Internal Audit Report (Oct-Mar)	May 31	Exchange / Clearing Corporation
Net Worth Certificate (half-yearly)	Within 60 days of Sep 30 / Mar 31	Exchange

Annual Audited Financials	October 31	Exchange
System Audit Report	Within 1 month of FY end	Exchange
Cyber Audit Report + Declaration	Within 3 months of FY end	Exchange
VAPT Report	Within 1 month of VAPT completion	Exchange
Quarterly Cyber Incident Report	Within 15 days of quarter end	Exchange
AI/ML Report (if applicable)	Within 15 days of quarter end	Exchange
Complaint Data Disclosure on Website	By 7th of each succeeding month	Website / Public
SCORES — Complaint Resolution	Within 15 working days of receipt	Complainant / SCORES

## Policy Review

Last Reviewed	11-FEB-2026
Reviewed By	Pawan Pratap Singh (Compliance Officer)
Approved By	Director

For and on behalf of: Manog Securities Pvt Ltd

Authorised Signatory	Mr. Vivek Gupta
Designation	Director
Date	11-FEB-2026
Signature	 <b>For Manog Securities Pvt. Ltd.</b> <b>Director</b>