

Policy created by	Operational/ Risk Management Staff
Policy reviewed by	Compliance Head
Approval Authority	Board of Directors
Officer responsible for implementation	Compliance Officer
Policy reviewed	April 6, 2020
Policy approved by Board on	April 7, 2020

**Meaning of Associated person:** Associated person (hereinafter referred to as “APS”) shall mean whole time director or employee of the Unique Stockbro Private Limited (“company”).

Persons associated with the company, who are involved in, or deal with, any of the following:

- (a) Assets or funds of investors or clients,
- (b) Redressal of investor grievances,
- (c) Internal control or risk management, and
- (d) Activities having a bearing on operational risk,

shall be required to have a valid certification from the National Institute of Securities Markets (NISM) by passing the NISM-Series-VII: Securities Operations and Risk Management Certification Examination as mentioned in the NISM communiqué/Press Release NISM/Certification/Series-VII: SORM/2010/01 dated November 11, 2010, read with Annexures-I and II thereto.

**Salient Features of Internal Policy for Associated Persons:**

All persons associated with company who are involved in handling of assets and funds of investors or client redressal of investor grievances or internal control and/or risk management or activities which have bearing on operation risk shall clear NISM-Series-VII: Securities Operations and Risk Management Certification (SORM) Certification.

Complete record with respect to certification of Associated Persons shall be maintained and in case of resignation or change of role or responsibility, appropriate corrective action shall be initiated in order to comply with SEBI and Exchange Guidelines. Even in case of Expiry of Certification, concerned AP shall be intimated well in advance and he or she will be assisted in process of clearance of certification.



Associated persons will be recruited only after rigorous recruitment procedures, sound referrals, inquiries etc. Proper database will be kept ready for each of the staff showing Name, Address, Photographs, Family details, contact numbers, emergency contact number and so on.

Associated Persons will give prompt and courteous replies to all clients while interacting with them. Clients will be handled with utmost care and all their queries or grievances will be dealt on a priority basis howsoever small it might be in terms of value.

Associated Persons will not indulge or assist in any activities which are detrimental to the interests of the clients or which violates any SEBI or Exchange Rules and Regulations. Associated Person will handle all assets including funds & securities of clients in proper manner and in accordance with SEBI and Exchange Rules, Regulations and notifications issued from time to time.

Associated Person will disseminate information strictly on need to know basis.


Associated Persons will not divulge information pertaining to one client to another and he or she would not advise any client on buying or selling a scrip.


Associated Persons will not act on the basis of unpublished price sensitive information. Also he will keep such information strictly confidential.

Associated Persons will always adhere to very high moral and ethical standards while dealing with clients or others.

For & behalf of

Unique Stockbro Private Limited

  
Paresh V. Popat  
Director

  
Ashish V. Popat  
Director



Date: April 6, 2020