

MBL AND COMPANY LIMITED

POLICY ON PRE-FUNDED INSTRUMENTS

Objective:

In order to minimize the frequency of acceptance of Pre-Funded Instrument viz. Demand Drafts, PayOrder, Banker's Cheque and/or any other Instruments which exist and is acceptable by Banks, to discharge of Pay-In and/or Margin Liabilities of the Clients and to monitor this Pay-In mechanism this "Pre-Funded Instrument & Electronic Fund Transfer Policy" is being formulated under the instructions of the Board MBL AND COMPANY LIMITED, in compliance and/or as mandated by Securities and Exchange Board of India (in short "SEBI") by its Circular No. CIR/MIRSD/03/2011 dated 09-June-2011 & Circular No. SEBI/HO/MIRSD/DOP/CIR/P/2018/113 dated 12-July-2018 and The Stock Exchanges, where the Company is a Trading Member.

Responsibility:

1. The Compliance Officer shall be responsible for the implementation and supervision of this Policy.
2. For proper implementation of the said policy The Chief Financial Officer/ Accounts Officer shall intimate the Compliance Officer in advance if any such circumstances arise where acceptance of such instruments are unavoidable and would subject MBL AND COMPANY LIMITED to Un-Covered Financial Risks. The Compliance Officer shall take all necessary steps for analysis before giving approval for such acceptance.
3. The Compliance Officer shall take all necessary steps to monitor, document, analyze and report the findings to the Board Members as well as the relevant Stock Exchanges and/or regulatory bodies, in a time bound manner, as detailed hereunder and/or as mandated by the Stock Exchanges and/or regulatory bodies.
4. The Compliance Officer shall exercise his/her independent judgment and take adequate precautions to ensure implementation of an effective monitoring mechanism, based on the day-to-day activities of the clients, general market information and the facts and circumstances.
5. The Internal Auditor of the Company, shall review the implementation, documentation, effectiveness and review the actions taken during the period of audit and shall record the observations with respect to the same in their Internal Audit Reports.
6. The Board of Directors shall peruse, review and provide necessary guidance with regard to the "PreFunded Instrument & Electronic Fund Transfer Policy", periodically, for strengthening the process

Definition of Special Circumstances:

The Prefunded Instruments may be accepted only in following special circumstances;

- If there are Bank Holiday on the following day.
- If the client does not have an account in the bank in which the company has accounts.
- If the client wants to create a position immediately and has no other way of transferring funds.
- If the Bank account of the client is in a cooperative bank, which may take some time for the cheque to be cleared.
- If the company Bank accounts clearing branch is not available in the city/village where the client has his bank account.

Process for acceptance of Pre-Funded Instrument:

1. Pre-Funded Instruments, include Demand Drafts, Pay-Order, Banker's Cheque and/or any other Instruments which exist and is acceptable by Banks.
2. As a matter of policy, Pre-Funded Instruments shall not be accepted for the discharge of Pay-In and/or Margin Liabilities of the Clients.
3. However, in the circumstances as mentioned in Point No. 3 herein above, where acceptance of such instruments are unavoidable and would subject MBL AND COMPANY LIMITED to Financial Un-Covered Risks, the following procedures shall be followed/adhered with regard to pre-funded instruments from Clients with the prior approval of The Chief Financial Officer/Accounts Officer and Compliance Officer:
 - If the aggregate value of pre-funded instruments is Rs. 50,000/- or more, per day per client, the Dealing Officer may accept the instruments only if the same are accompanied by the name of the Bank Account Holder, i.e. the registered Client who is furnishing the Pre-Funded Instruments, such as Pay Order, Demand Draft, Banker's Cheque, etc. and number of the Bank Account Debited for the purpose, duly certified by the issuing Bank. The mode of certification should include the following:
 - A. Certificate from the issuing bank on its letterhead or on plain paper with the seal of the issuing bank. Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument
 - B. Certified copy of the passbook/bank statement for the account debited to issue the instrument
 - C. Authentication of the bank account – number debited and name of the account holder by the issuing bank on the reverse of the instrument.
 - If the aggregate value of pre-funded instruments i.e. Demand Draft/Pay Order/banker cheque is less than Rs. 50,000/- per day per client then apart from the bank certificate from the issuing bank, fund will be accepted if client provide the undertaking in the prescribed format.
 - All above procedures of acceptance of Pre-Funded Instruments shall be checked and verified by The Accounts Officer and Compliance Officer, independently.

Process for acceptance of Electronic Fund Transfer

1. Electronic Fund Transfers, viz. NEFT, RTGS and Transfers can be accepted from Clients in case they are sourced from the pre-notified declared accounts of the clients. If payment is not received from the said declared bank account than such fund will be marked and transferred as suspense and after receiving confirmation and necessary documents from client it will be credited to his/her account.
2. An audit Trail of the funds received through Electronic Fund Transfer is to be maintained to ensure that the funds are received from the declared accounts of the clients only.
3. All above procedures of acceptance of Electronic Fund Transfers shall be checked and verified by The Accounts Officer and Compliance Officer, independently.

Discontinuation of Acceptance of Cash

Pursuant to the Circular No. SEBI/HO/MIRSD/DOP/CIR/P/2018/113 published by SEBI on 12- July-2018, the Company has decided that all payments shall be received/ made from/ to the clients strictly by account payee crossed cheques or by way of direct credit into the bank account through electronic fund transfer, or any other mode permitted by the Reserve Bank of India. The Company shall accept cheques drawn only by clients and also issue cheques in favour of the clients only, for their transactions. The Company shall not accept cash from their clients either directly or by way of cash deposit to the Bank Account of MBL AND COMPANY LIMITED.

Management Information System (MIS):

1. A daily MIS Report shall be generated by The Accounts Officer with regard to “Acceptance of Pre-Funded Instrument & Electronic Fund Transfer” and the “Action Taken Report”, to the Compliance Officer.
2. A Monthly MIS report shall be submitted by the Compliance Officer to the Board of Directors. The Compliance Officer shall apprise the Board of Directors of the exception(s) noticed, if any as also the Actions taken by him/her.
3. Internal Auditor shall verify and submit separate report on a monthly basis (by 15 Calendar Days from the end of each month) in respect of Pre-Funded Instruments and Electronic Fund Transfers and the actions taken in respect of the Compliances made and pending actions, if any.

Record Maintenance:

The Accounts Officer shall be responsible for the record maintenance of such activities. The Accounts Officer and shall have the discretion to take assistance/help from any professionals and/or software

for the better Monitoring of “Pre- Funded Instrument & Electronic Fund Transfer Policy”, with prior approval of the Board of Directors, without diluting the accountability and responsibility of the Compliance Officer.