

Internal control

1. Details

- Date of starting of business
- Background of company

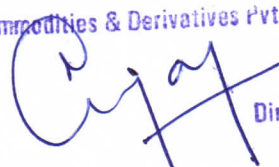
2. Terminal

- Procedure of accepting & placing of orders
Company routes customer's orders through TWS / CTCL, client are first mapped in on particular terminals and orders can be punched in through such empanelled terminals only. Thus due care is taken that orders are not punched on anywhere / anyone basis. Access to system is allowed only to authorize user and system has a password mechanism which restricts access to authenticate users. Only orders that are within the parameters specified by the Risk Management Systems are allowed to be placed. The client places the orders through phone to their respective RM. The client identity is verified before accepting the order.
- Control over operator to ensure that he is entering authorized trades only
Operators do confirm the identity of the client properly before placing the order. They also give confirmation to client after placing orders. We also send SMS to clients at the end of the day in addition to the SEBI / Exchange required documents to be sent.
- System in place to check certification of approved users has not expired
Our IT staff regularly checks whether certification of approved users has expired or not.

3. Opening and Closing of Branch

- Detailed due diligence will be done by our team before opening any new branch in any location. Before hiring branch team, detailed scrutiny will be done by our team and also by our senior management with respect to knowledge of the person, past experience, etc. The new employees will also be sufficiently trained on the various compliances including the PMLA rules, etc.
- The exchange shall be intimated about the opening of our new branch.
- The terminal allotted at the new branch shall be given proper details including the location, etc.
- All other compliances such display of notice boards, certificates, use of terminal, client dealing, etc. shall be properly followed at the branch.
- Regular internal inspection as required by SEBI / Exchange shall be done by us.
- Before the closure of any branch, the clients mapped to that branch shall be informed in advance and shall be given an option to either close their account with the member or shift their account to other branch / head office.

For Trade Winds Commodities & Derivatives Pvt. Ltd.


Director

- All the necessary compliances with respect to client dealing, terminals, etc. for branch closure shall be properly and adequately and immediately followed.

4. Process for Identification of beneficial ownership of clients

- For any non-individual account being opened with the member, all the documents as stipulated by SEBI / Exchange shall be obtained by the member.
- The clients shareholding shall be obtained till the individual shareholder is identified i.e. in case a corporate holds shares of the non-individual account, that corporate shareholding shall also be obtained. The limits as prescribed by SEBI / Exchange shall be followed.

