

Santosh Kumar Kejriwal Securities Pvt Ltd

OUTSOURCING POLICY

SEBI vide its circular no. CIR/MIRSD/24/2011 dated December 15, 2011 issued a General Guidelines on Outsourcing of Activities by Intermediaries, SEBI decided to put in place comprehensive guidelines to collectively cover principals for outsourcing for Intermediaries.

Santosh Kumar Kejriwal Securities Pvt Ltd is not outsourcing any business activities, but in view of the above circular Board has decided to streamline the policy in line of the SEBI so that if and when in future skkspl decided to outsource then it will adapt the following strategy.

Choosing an outsourcer

Santosh Kumar Kejriwal Securities Pvt Ltd shall invite bids from various parties to act as the Outsourcer for the Company. While selecting an outsourcer, SKKSPL shall inter-alia take into account the following

1. Outsourcer's resources and capabilities
2. Its financial soundness and capability to perform the work within fixed timelines.
3. Compatibility of the practices and systems of an outsourcer
4. Location of an Outsourcer

Nature of Activities outsourced / to be outsourced

In the light of this policy and in due compliance of SEBI's captioned circular dated December 15,2011, SKKSPL shall outsource the following activities relating to Record Keeping:

To Collect KYC documents / Client Registration Forms from the Head Office

To store and preserve these KYC forms with all safety, security and in confidential manner

To retrieve and provide the scanned / photocopied / original KYC form as per the requirements of SKKSPL from time to time and to maintain proper documents in this respect.

However, the core business activities such as compliance functions, execution of orders and monitoring of trading activities of clients, dematerialization of securities, investment related activities, KYC requirements as per SEBI (KRA) Regulations, 2011 etc. shall not be outsourced.

The records relating to all activities outsourced shall be preserved centrally i.e. at the Corporate/ Head office so that the same is readily accessible for review by the Board and/ or Management Committee as and when needed. Management Committee shall ensure that such records are regularly updated and may also form part of the corporate governance review by the management