

SAPPHIRE WEALTH MANAGEMENT SERVICES PVT. LTD.

Policy on Pre-Funded Instruments/electronic Fund Transfer

With reference to NSE Circular No. NSE/INSP/2011/118 dated June 9, 2011 on the drafted policy on Pre-funded Instrument/Electronic Fund Transfer which has been approved by Board /Management/ key Personnel's are given hereunder:

- The company instructs its office bearers to check properly the instrument received from clients before depositing the same into bank.
- If on checking, the instrument is identified as Pay Order/DD, then a suitable reason/classification is required to be obtained from the client.
- The details of the instrument must be tallied with the detail provided by the clients in KYC before entering into back office software.
- In case of mismatch is identified, it should be reported to department head/ management/ key personnel's for taking appropriate action.
- Clients who make the payment through pre-fund instrument will be advised to avoid it or not to use this route by educating them the Exchange and PMLA rules & byelaws in this regard.
- Payment received through Electronic Fund Transfer have to be properly check with the detail available in bank statement like payee account no, payee name etc. and in case of non – availability of the detail in bank statement then it will be asked from the client to confirm the payment detail through e-mail or SMS.

In addition to above circulars, issued by Exchange from time to time has to be followed for proper compliance on this matter.