

## **INTERNAL CONTROL POLICY**

The operations of the company are carried out in a very controlled manner.

- Employees of Vramath Financial Services Ltd. will be directed that any market related news received by them either in their official mail/personal mail/blog or in any other manner, should be forwarded only after the same has been seen and approved by the concerned Intermediary's Compliance Officer. If an employee fails to do so, he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for action. The Compliance Officer shall also be held liable for breach of duty in this regard.
- Proper internal code of conduct and controls should be put in place.
- Employees/temporary staff/voluntary workers etc. employed/working in Vramath Financial Services Pvt. Ltd. will not encourage or circulate rumours or unverified information obtained from client, industry, any trade or any other sources without verification.
- Access to Blogs/Chat forums/Messenger sites etc. will be either be restricted under supervision or access should not be allowed.
- Logs for any usage of such Blogs/Chat forums/Messenger sites (called by any nomenclature) shall be treated as records and the same should be maintained as specified by the respective Regulations which govern the concerned intermediary.
- Employees will be directed that any market related news received by them either in their official mail/personal mail/blog or in any other manner, will be forwarded only after the same has been seen and approved by the concerned Intermediary's Compliance Officer. If an employee fails to do so, he/she shall be deemed to have violated the various provisions.
- As per the Company policy, any of the work Activities being on operational risk and dealing with assets of funds of investors of clients being performed by such persons obtaining, NISM-SORM Certification shall be optional provided that they are supervised by the Compliance Officer who shall have to obtain / continue to have NISM – SORM Certification or such other prescribed certification at all times.