

KNA Share Brokers Private Limited

POLICY ON GOOD TILL CANCELLED / GOOD TILL TRIGGERED ORDERS

Circular: - Ref. NSE/INSP/62528 dated June 21, 2024

Policy created by	Compliance Team
Policy reviewed by	Compliance Officer
Policy reviewed on	01-07-2024
Policy Approved by	Board of Directors
Policy approved on	01-07-2024

Version - 1.0

Background

Exchanges vide its circular NSE/INSP/62528 dated June 21, 2024 and 20240622-2 dated June 22, 2024 pertaining to 'Policy on Handling of Good Till Cancelled Orders offered by Members to Clients' mandated trading members to formulate a policy in case they offer "Good Till Cancelled" / "Good Till Triggered" orders or orders of similar type.

Details of Good Till Cancelled/Good Till Triggered/orders

- The Policy is MANDATORY in nature and forms a part and parcel of the Mandatory Policies envisaged in the "Account Opening Form" of KNA Share Brokers, while registering and/or re-activating Clients. The applicability of this Mandatory Policy spans across all Non-Institutional Clients of KNA Share Brokers.
- The Risk Management Department of KNA Share Brokers shall be responsible to monitor "Good Till Cancelled and/or Good Till Triggered Orders and/or Similar Types of Orders of Client(s)" (in short "such Orders"), which would remain "valid" on attributes of "price" and also the "time frame" on the Trading Platform of KNA Share Brokers
- At the outset it is important to mention that the "GTC and/or GTT and/or Similar Types of Orders" of Client(s) can be placed on the Trading Platform of KNA Share Brokers provided the applicable un-encumbered Collateral (as mandated by the Clearing Corporation) is made available by the Clients to KNA Share Brokers.
- As "un-executed" "GTC and/or GTT and/or Similar Types of Orders" of Client(s) are Non Importable onto the Back Office, it is for the benefit of the Client to Notify the Risk Management Depart of KNA Share Brokers by an email communication regarding the un-executed / pendency of execution of "GTC and/or GTT and/or Similar Types of Orders", by the Client from their registered e-mail id with details of Trades along with their Unique Client Code.
- The Client will be duty bound to monitor its "GTC and/or GTT and/or Similar Types of Orders" and maintain the requisite Collateral in Cash and/or Acceptable Security in the stipulated ratio, to ensure that the "GTC and/or GTT and/or Similar Types of Orders" are backed by requisite Collateral to remain Valid in the Trading Platform of KNA Share Brokers.
- As "GTC and/or GTT and/or Similar Types of Orders", attract applicable Collateral as per the norms laid by the Clearing Corporation and Allocation of applicable Cash Collateral by the Trading Member from its OWN Funds (if applicable Cash Collateral is NOT provided by the Client), as per the extant minimum Cash Collateral requirement enshrined by the Clearing Corporation. Though KNA Share Brokers would endeavour to provide the applicable Cash Collateral from its OWN Funds on Best Effort Basis, however the Client cannot claim the placement of "GTC and/or GTT and/or Similar Types of Orders" and the continuation of the validity of such Orders on a concurrent basis, without providing the requisite applicable Cash Collateral to KNA Share Brokers.
- In the event that a request for release of Collateral (both Cash and/or Security) is placed by the Client to KNA Share Brokers during the Trading Hours (i.e. 9:00 AM to 4:00 PM), the Risk Management Desk would process the same taking into account the pending "GTC and/or GTT and/or Similar Types of Orders".
- In the event that a request for release of Collateral (both Cash and/or Security) is placed by the Client to KNA Share Brokers during the Non - Trading Hours (i.e. other than the timings mentioned herein above), the Risk Management

Desk would process the same without taking into account the pending "GTC and/or GTT and/or Similar Types of Orders", which may lead the Cancellation and/or Rejection of the "GTC and/or GTT and/or Similar Types of Orders" in the Trading Platform of KNA Share Brokers.

- It is pertinent to mention that KNA Share Brokers would be unable to intimate the Client regarding the Cancellation and/or Rejection of the "GTC and/or GTT and/or Similar Types of Orders" in the Trading Platform of KNA Share Brokers attributed to the non-maintenance of the requisite Collateral by the Client.
- The Client shall NOT hold SMIS Limited responsible for the Non-Execution of GTC and/or GTT and/or Similar Types of Orders attributed for non-maintenance of requisite Collateral in the stipulated ratio, at the Client Level. It is pertinent to mention that the Client shall NOT claim any prospective notional "losses and/or compensation", for the Non Execution of "GTC and/or GTT and/or Similar Types of Orders".
- The Risk Management Department of KNA Share Brokers will monitor the announcement of "Corporate Actions" (both Cash Corporate Action and/or Non-Cash Corporate Action) in respect of the Underlying Security for all the Open "GTC and/or GTT and/or Similar Types of Orders" of Client(s) on a Daily Basis.
- KNA Share Brokers shall intimate their clients about details of upcoming Corporate Actions applicable for such unexecuted "GTC and/or GTT and/or Similar Types of Orders" of Client(s), which should not be later than one day prior to the ex-date of the Corporate Action.
- The Clients are duty bound to monitor the "GTC and/or GTT and/or Similar Types of Orders" placed on the Trading Platform of KNA Share Brokers and the announcement of Corporate Actions by the underlying Security Issuer. The Client is also duty bound to follow the intimation by KNA Share Brokers to their Client(s) over E-Mail at their Registered Email address (es) and/or Short Messaging Services on their Registered Contact Number(s).
- KNA Share Brokers will NOT ALLOW CONTINUATION of "GTC and/or GTT and/or Similar Types of Orders" of Client(s) in an automated manner where "Corporate Actions" (both Cash Corporate Action and/or Non-Cash Corporate Action) are being caused by way of Book Closure and/or Record Date by the Registrar of the Issuer on the Stock Exchange.
- The Clients are free to MODIFY the "GTC and/or GTT and/or Similar Types of Orders" of Client(s) where "Corporate Actions" (both Cash Corporate Action and/or Non-Cash Corporate Action) are being caused by way of Book Closure and/or Record Date by the Registrar of the Issuer on the Stock Exchange, before the Ex-Date of the Underlying Security.
- In case the Client(s) fail to modify the "GTC and/or GTT and/or Similar Types of Orders" before the ex-date as announced by the Stock Exchanges, the Risk Management Department of KNA Share Brokers would CANCEL the pending "GTC and/or GTT" Orders and/or Similar Types of Orders of Client(s) where "Corporate Actions" (both Cash Corporate Action and/or Non-Cash Corporate Action) are being caused by way of Book Closure and/or Record Date by the Registrar of the Issuer on the Stock Exchange, which are open/ un-executed on the Trading Platform of KNA Share Brokers, on a best effort basis.
- The Risk Management Desk of KNA Share Brokers would intimate the Clients, regarding the cancellation of the "GTC and/or GTT" Orders and/or Similar Types of Orders, by an E-Mail to their registered E-Mail Id, by T+1 day from the date of Cancellation of such "GTC and/or GTT and/or Similar Types of Orders".

- KNA Share Brokers would follow the Corporate Actions which are made available by the Stock Exchanges on their official Website(s), viz. www.nseindia.com & www.bseindia.com and the Ex-Dates pertaining to cause of Corporate Action in way of Record Date and/or Book Closure announced in such official websites and/or the data files provided by the Stock Exchanges to their Trading Members for updation of scrip master on the Trading Platform of Trading Members.
- Clients who wish to Notify KNA Share Brokers for the “Stop Trade Facility” as per SEBI vide Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, the Client is Duty Bound to specifically Notify the placement of “GTC and/or GTT and/or Similar Types of Orders” for cancellation of such Orders.

Policy Communication

The said policy shall be made part of the Account Opening Form/Kit under heading “Policy on Handling of Good Till Cancelled Orders of Client” of Policy and Procedures document and shall also be displayed on the company’s website.

The Client agrees to abide by this “MANDATORY POLICY” on Handling of Good Till Cancelled and/or Good Till Triggered Orders and/or Similar Types of Orders offered by KNA Share Brokers to its Clients and the Client(s) would NOT claim any Monetary Losses and/or Compensation, for the adherence of the above attributes laid in “the Policy”, by KNA Share Brokers.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff / Employees /and Directors of the Company.

KNA Share Brokers Private Limited

Designated Director