



Policy on Outsource of Activities

The guiding principles in respect of policy for Outsourcing of Activities are laid down by SEBI Vide circular no. CIR/MIRSD/24/2011 dated 15/12/2011 & subsequent NSE/BSE Circular and consolidated circular; accordingly our policy is as under:

As a policy, the Management has decided NOT to outsource any CORE activities (as per Note) of the Broking Division from outside Agencies.

Some of the exception shall be Dispatch, Courier, Postage etc. which is of noncore in nature.

For GEPL Capital Pvt Ltd.

A handwritten signature in blue ink, appearing to read 'Vivek I Gupta'.

Mr. Vivek I Gupta
Director



Note :

a) *Activities that shall not be Outsourced :*

- I. *The core business activities and compliance functions shall not be outsourced (for eg. Compliance towards Exchange, SEBI, FIU or any other Authorities)*
- II. *A few examples of core business activities are –*
 - i. *Execution of orders and monitoring of trading activities of clients*
 - ii. *Assessment of Risk*
 - iii. *Dematerialisation of securities in case of depository participants;*
 - iv. *Investment related activities in case of Mutual Funds and Portfolio Managers.*
 - v. *Regarding Know Your Client (KYC) requirements, we shall have to comply with the provisions of SEBI {KYC (Know Your Client) Registration Agency} Regulations, 2011 and Guidelines issued there under from time to time.*
 - vi. *Other than the above stated points and as per the NSE/BSE/SEBI circular relating to the subject are non-core activities.*

b) *Principles for Outsourcing for Intermediaries:*

https://www.nseindia.com/content/members/mem_comp_annexB.pdf