

MATHRAN SECURITIES PRIVATE LIMITED

Policy for Use of Facsimile / Scanned Signatures

Policy created by : Compliance Head	Policy created on : 01/04/2014
Policy reviewed by : Internal Auditor	Policy reviewed on : 01/04/2024
Policy approved by : Board of Directors	Policy approved on : 10/04/2024
Periodicity of Review periodicity : Yearly / SOS	
Version number : V2024.01	Effective date of implementation : 10/04/2024
Officer responsible for implementation :	Mr. Arijit Chandra, Compliance Officer

Objective

The purpose of this policy is to regulate the use of facsimile (rubber stamp) and scanned (digital image) signatures on various documents issued by the Stock Broker. This policy applies to all departments, including Compliance, Operations, and Accounts, for documents such as contract notes, margin statements, and correspondence with clients/exchanges.

Authorized Documents

Facsimile or scanned signatures may be used for the following documents:

- Physical Contract Notes and Daily Margin Statements.
- Statement of Accounts (Ledgers).
- Welcome Letters and Client Registration Letters.
- Quarterly Retention Statements.
- Other documents as and when required

Note: Scanned/Facsimile signatures shall **not** be used for documents requiring notarization, statutory filings where wet signatures are mandated by law, or high-value bank instructions unless specifically permitted by the banking partner.

Custody and Control

To prevent unauthorized use, the following controls are implemented:

- **Physical Facsimile (Stamps):** Shall be kept in a locked cupboard under the custody of the **Compliance Officer** or an **Authorized Signatory** designated by the Board.
- **Digital Scanned Images:** Shall be stored on a secure server with restricted access. Access to the signature file shall be password-protected and limited to authorized personnel in the IT/Operations department.
- **Usage Logs:** A register/log shall be maintained recording every instance where the facsimile stamp was issued, the number of documents stamped, and the date.

Authorized Signatories

Only signatures of the following personnel are authorized to be digitized or converted into facsimile stamps:

1. Designated Directors.
2. Compliance Officer.
3. Authorized Signatories as per the list submitted to the Exchange.

Security Measures and Risks

- **Prevention of Misuse:** The software used to print scanned signatures must have an audit trail.
- **De-activation:** Upon the resignation or termination of an authorized signatory, their digital signature file must be deleted immediately, and physical stamps must be destroyed in the presence of the Compliance Officer.
- **Indemnity:** The entity shall be responsible for any unauthorized use of these signatures due to negligence in following the custody protocols mentioned above.

Review Policy:

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs.

The policy may be reviewed by the Managing Director/CEO and place the changes in policy before the Board at the meeting first held after such changes are introduced.

Policy communication:

A copy of the approved policy shall be made available to Compliance officer, Head of risk and Head of Operations.

This Policy is prepared as required by

- NSE Circular No. NSE/INSP/27155 dated July 16, 2014
- NSE Circular No. NSE/INSP/32524 dated June 6, 2016