Mandatory document dealing with policies and procedures Pursuant to SEBI's Circular MIRSD/SE/Cir-19/2009 dated December 3, 2009: Policies and Procedures forms integral part of the Member Constituent agreement

1. Refusal of orders of Penny Stocks : Allegro shall have the absolute discretion to accept or reject any buy or sell order for execution from a client with respect to penny stock, stocks having low liquidity which is considered to be extremely volatile or subject to Market Manipulation.

The execution of such order will be subject to scrutiny by Allegro and based on the recommendation of the Relationship Manager. Due to the illiquid nature of the scrips Allegro shall not be responsible for delay in execution of order and consequent opportunity loss or financial loss to the client.

2. Setting up client's Exposure Limits: Allegro Capital Advisors Pvt ltd is presently offering cash & carry business, delivery based business.

Allegro Capital Advisors Pvt Ltd may provide exposure subject to the below conditions.

Purchase Limit: Allegro may provide one time exposure limit to the client on the clear ledger balance in the account. Intra-day trading is not allowed.

Sell Limit: Allegro may provide sell limit to the extent of value of clear stock available in the client demat account maintained with Allegro. Selling will not be allowed for stocks yet to be received from the exchange. (Buy today – sell tomorrow is not allowed)

3. Applicable Brokerage Rates: Brokerage shall be as per the rates agreed upon with the client in the KYC at the time of registration of the client. The rate of brokerage shall not exceed the maximum brokerage permissible under the Exchange bye-laws.

The brokerage shall however be exclusive of the following :

1 DP Annual maintenance charges

2 DP transaction charges / Pledge / Re-pledge / Demat / Remat charges

3 Account Opening charges

4 Delayed Payment charges

5 Penalties levied by Exchange

6 Bank charges towards the cheques received unpaid,

7 Statutory charges payable to Exchange/SEBI/Govt. Authorities etc.,

8 SEBI/Exchange/Clearing Member Turnover charges

9 Other out of pocket and service related charges

4. Imposition of Penalty / delayed payment charges by either party, specifying the rate and the period (This must not result in funding by the broker in contravention of the applicable laws)

Delayed payment charges: Pursuant to Exchange Bye-laws, the Member broker is currently required to make pay-in of funds to the Exchange by T+2 morning and arrange delivery of securities to the Exchange latest by T+2 morning. Further Member broker is also required to maintain adequate upfront margins with the Exchange to avail exposure for trading. The Exchanges have also defined the ratios in which the cash and collaterals are to be deposited and maintained by the Member broker. In addition the Exchange requires the member broker to deposit some of the margins like MTM, in Cash only.

5. The right to sell clients' securities or close clients' positions, without giving notice to the client, on account of non-payment of client's dues (This shall be limited to the extent of settlement/margin obligation)

ALLEGRO shall be entitled to liquidate / close out all or any of the CLIENT's positions for non-payment of margins or other amounts, outstanding debts, etc. and adjust the proceeds of such liquidation / close out, if any, against the CLIENT's liabilities / obligations.

In case of purchase on behalf of the CLIENT, the CLIENT authorises ALLEGRO to close out the transactions by selling the securities, in case the CLIENT fails to make full payment to ALLEGRO for the execution of the contract within two days of trade execution before pay-in-day (as fixed by stock exchange for the concerned settlement period), whichever is earlier, unless the CLIENT already has an equivalent credit with ALLEGRO. The loss incurred in this regard, if any, will be met from the margin money of the CLIENT. The CLIENT agrees to make good the shortfall, if any, immediately on being intimated of the shortfall by ALLEGRO.

In case of sales on behalf of CLIENT, the CLIENT authorises ALLEGRO to close out the contract by effecting purchases if the CLIENT fails to deliver the securities sold with valid transfer documents within T+2 day. Loss on transaction, if any, will be deductible from the margin money of the CLIENT. The CLIENT agrees to make good the shortfall, if any, immediately on being intimated of the shortfall by ALLEGRO.

6.Shortages in obligations arising out of internal netting of trades: Allegro does not allow exposure without clear stock available in the clients demat account held with Allegro.

7. Conditions under which a client may not be allowed to take further position or the broker may close the existing position of a client

Client may not be allowed further exposure where the client is not having adequate margin as per condition defined under the Risk Management Policy.

8. Temporarily suspending or closing a client's account at the client's request

· The client is inactive for more than 6 months

· Client complaints to Allegro / Stock Exchange alleging unauthorised trades being executed in the account

· On notices received from Government or Local authorities and Income Tax, Service Tax etc.,

· The account is under investigation by any regulatory body.

· Closure / suspension request received from client in writing.

· A client is reported to have expired.

9. Deregistering a client

· Allegro may de-register the client account based on action taken by SEBI/NSE/BSE or the client being a part of the debarred entities published by SEBI.

· Allegro may de-register the client account where the client is having suspicious background, link with suspicious organization.

· Allegro shall have the right to close out existing positions, for recovering its dues, if any before deregistering a client