POLICY ON USE OF FACSIMILE / SCANNED SIGNATURES FOR PHYSICAL CONTRACT NOTES

1. Regulatory Framework

This Policy is framed in accordance with the provisions of the Securities and Exchange Board of India (Stock Brokers) Regulations, 1992, read with applicable SEBI circulars relating to issuance of contract notes, including SEBI Circular No. SMD/SED/CIR/93/23321 dated November 18, 1993 and subsequent amendments, as well as guidelines issued by stock exchanges such as the National Stock Exchange of India and BSE Limited governing authentication, issuance, and record maintenance of contract notes.

2. Objective

The objective of this Policy is to establish a robust and controlled framework governing the use of facsimile or scanned signatures on physical contract notes, ensuring that such usage maintains the authenticity, integrity, and evidentiary value of contract notes while remaining fully compliant with regulatory requirements.

3. Applicability

This Policy shall apply to all physical contract notes issued by the Company in cases where electronic contract notes are not issued or where clients have specifically opted for physical contract notes in accordance with regulatory provisions.

4. Use and Validity of Facsimile / Scanned Signatures

The Company may use facsimile or scanned signatures of authorized signatories on physical contract notes, provided that such signatures are affixed in a controlled environment and in accordance with regulatory requirements. Such signatures shall be deemed valid and legally enforceable, equivalent to original handwritten signatures subject to compliance with applicable laws and internal controls.
The Company shall ensure that the use of such signatures does not compromise the authenticity or reliability of the contract note.

5. Authorization and Safeguards

Facsimile or scanned signatures shall be used strictly under the authority of specifically designated signatories approved by the management. The Company shall maintain specimen signatures and implement stringent access controls to ensure that such signatures are not misused, duplicated, or accessed by unauthorized persons. The custody, storage, and usage of such signatures shall be subject to adequate internal checks, including maker-checker controls and restricted system access.

6. System Integrity and Audit Trail

All physical contract notes bearing facsimile or scanned signatures shall be generated only through secure, system-driven processes with complete audit trails. The system shall ensure that contract notes are sequentially numbered, tamper-proof, and contain all mandatory details as prescribed under SEBI and Exchange regulations. The Company shall maintain verifiable logs capturing generation, authorization, and issuance of such contract notes to ensure traceability and accountability at all times.

7. Issuance and Dispatch

Physical contract notes shall be issued and dispatched to clients within the timelines prescribed under applicable SEBI and Exchange regulations. The Company shall maintain appropriate proof of dispatch and, where feasible, acknowledgment of receipt. In cases where both electronic and physical contract notes are issued, consistency of data and records shall be ensured.

8. Compliance, Monitoring and Risk Mitigation

The Compliance Department shall periodically review the process relating to the use of facsimile or scanned signatures to ensure adherence to regulatory requirements and internal controls. Any deviation, misuse, or operational lapse shall be treated as a serious compliance matter and shall be immediately escalated for corrective action. The Company shall also ensure that appropriate internal audits are conducted to validate the effectiveness of controls.

9. Record Retention

All contract notes issued with facsimile or scanned signatures, along with supporting records, logs, and authorization details, shall be preserved in accordance with applicable regulatory requirements and shall be readily available for inspection by regulators, exchanges, and auditors.

10.Review of Policy

This Policy shall be reviewed at periodic intervals, not less than annually, or as and when required due to changes in regulatory framework or operational requirements. Any amendments shall be approved by the Board of Directors or the designated authority.