

# **Neon Vinimay Private Limited**

## **POLICY ON COMPLIANCE OFFICER**

Circular: - Ref.

Policy created by	Compliance Team
Policy reviewed by	Compliance Officer
Policy reviewed on	31/12/2024
Policy Approved by	Board of Directors
Policy approved on	02/01/2025

**Version - 1.0**



As per Regulation 18A of SEBI (Stockbroker) Regulation, 1992, Company will appoint a Compliance Officer who shall be responsible for monitoring the compliance of the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by SEBI or Central Government or Exchanges for redressal of investors' grievances.

The Compliance Officer is required to immediately and independently report to SEBI/Exchanges any non-compliance observed by him.

Following key factors will play an important role and same will be applied throughout the tenure:

- Compliance Officer appointed Shall be a graduate or an equivalent examination from a Government recognized institution.
- At the time of appointment, the candidate should at least have 2 years of prior work experience in banking or financial services, handling Audit/Finance/Compliance/ Legal/Operations/Risk Management functions.
- The eligible candidate should have good understanding of securities market industry, risk management, knowledge of regulations, legal framework and regulatory expectations.
- Compliance officer will obtain NISM-Series-III A: Securities Intermediaries Compliance (Non-Fund) Certification Examination within 1 year from the date of employment in terms of SEBI notification dated March 11, 2013.
- The Compliance Officer shall ensure that the certification is renewed before the completion of its validity, as per the procedure specified by NISM, from time to time.
- In order to ensure that the Compliance Officer is well informed of all relevant laws and amendments thereof, it is essential that there should be a continuing education program for him/her and half-yearly training will be Imparted to the team of compliance officer which will cover subject-wise key regulatory requirements and regulatory changes made in the last six months.
- Any transfer / removal of Compliance Officer will be done with explicit prior approval of the Board/ Partners as the case may be and, after following a well- defined and transparent internal administrative procedure and reasons be recorded in writing.
- In case of any change in Compliance Officer due to any reasons beyond the control of the Company such as death, resignation etc., Company is required to intimate the Exchange within 7 working days of such a change. In case of such unforeseen change, the Compliance Officer should be appointed within three months from the date of death/resignation of the erstwhile Compliance Officer and confirm the same to the Exchange.
- Notwithstanding the above, the office of the Compliance Officer shall not remain vacant for more than 15 calendar days. In the event of resignation/ demise etc. Company should appoint an interim Compliance Officer till such time a regular Compliance Officer is appointed within 3 months from the date of vacation of office.
- Company shall ensure that the person appointed as Compliance Officer is "fit and proper" in terms of Schedule II of SEBI Intermediaries Regulations, 2008.
- The Compliance Officer shall have the ability to independently exercise judgement in all matters of compliance and regulations. The Compliance Officer should have the freedom and sufficient authority to interact with regulators/supervisors directly and ensure compliance. In addition, he/she shall have the necessary authority to communicate with any staff of the Company and have access to all records or files that are necessary to carry out entrusted responsibilities in respect of the compliance issues.






- It shall be ensured that the Compliance Officer or any staff of his office is not assigned any responsibility which brings elements of conflict of interest, especially any role relating to business development/sales. The Compliance Officer shall under no circumstances act in such a dual capacity.
- Company shall ensure that no trading terminal is allotted to the Compliance Officer or any staff of his office except for the purpose of risk management/monitoring/testing or for view only purpose and no trades shall be executed from such terminals.
- Company shall also reserve the right to seek necessary explanations from the Compliance Officer or record his/her statements in terms of the relevant rules/regulations of the Exchange and initiate suitable disciplinary action against him/her including debarment or removal, if he/she is found to have failed to carry out his/her responsibilities in a reasonable manner. All actions in this regard shall be initiated by the Exchange, after following due process and providing an opportunity of hearing to the Company/Compliance officer.

The policy may be reviewed as and when there is any change introduced by any statutory authority or as and when it is found necessary to change on account of need for an Improved compliance.

Neon Vinimay Private Limited  
For NEON VINIMAY PVT. LTD.

  
DIRECTOR

Jatesh Jain

Designated Director