



**Secretarial Compliance Report of Geojit Financial Services Limited**  
**(CIN. L67120KL1994PLC008403)**  
**11<sup>th</sup> Floor, 34/659-P, Civil Line Road, Padivattom, Kochi – 682024**  
for the financial year ended 31.03.2024.

We, M/s Satheesh and Remesh, Practicing Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by Geojit Financial Services Limited ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31.03.2024 ("Review Period") in respect of compliance with the provisions of:
  - a. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
  - b. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI").

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - Not applicable to the company for the period under review;
- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - Not applicable to the Company for the period under review.
- e. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - Not applicable to the Company for the period under review.
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - Not applicable to the Company for the period under review.
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- i. Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020
- j. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- k. Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018



- l. Securities and Exchange Board of India (Research Analysts) Regulations, 2014
- m. Securities and Exchange Board of India (Investment Advisers) Regulations, 2013
- n. Securities and Exchange Board of India (KYC (Know Your Client) Registration Agency) Regulations, 2011
- o. Securities and Exchange Board of India (Intermediaries) Regulations, 2008
- p. Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations 2007.
- q. Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair trade practices relating to securities Market) Regulations 2003
- r. Securities and Exchange Board of India (Stock Brokers) Regulations, 1992
- s. and other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:

- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under to the extent of its applicability, except in respect of matters as specified in Annexure I;
- b) The listed entity has taken the following actions to comply with the observations made in previous reports: - Attached as Annexure -II

We hereby further report that, during the Review Period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	Nil
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	Nil
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>The listed entity is maintaining a functional website.</li> <li>Timely dissemination of the documents/ information under a separate section on the website.</li> <li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website</li> </ul>	Yes	Nil





4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t:</b> <ul style="list-style-type: none"> <li>• Identification of material subsidiary companies</li> <li>• Disclosure requirement of material as well as other subsidiaries</li> </ul>	Yes	Nil
6.	<b>Preservation of Documents:</b> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	Nil
7.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/ during the financial year as prescribed in SEBI Regulations.	Yes	Nil
8.	<b>Related Party Transactions:</b> <p>a. The listed entity has obtained prior approval of Audit Committee for all related party transactions;</p> <p>b. In case no prior approval has been obtained, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee.</p>	Yes	Please refer point no. 8(a).
		NA	
9.	<b>Disclosure of events or information:</b> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Nil
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	No	Details of Action taken against the listed entity by SEBI or by Stock Exchanges is given as Annexure I of this report.





12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and/ or its material subsidiary(ies) has/ have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	There is no resignation of statutory auditors from the listed entity or its material subsidiary.
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. etc. except as reported above.	Yes.	Nil

#### Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

*For Satheesh and Remesh, Company Secretaries,*

**For Satheesh and Remesh  
Company Secretaries**

**N. Satheesh Kumar**  
Partner  
M.No. 16543  
CP No. 6607

*N. Satheesh Kumar*

Partner

M.No. 16543

CP No. 6607

UDIN: A016543F000441374

Place: Kochi

Date: 24.05.2024





Annexure I

Sl. No	Compliance Requirement (Regulations/circulars/ guidelines)	Regulation/ Circular No	Deviation	Action taken by	Type of Action	Details of Violation	Fine Amount in Rs.	Observations/Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
1	Stock Broker is required to report the closure of their Bank accounts to the Exchange within 7 days of closure	NSE Circular - NSE/INSP/2016/33276 dated 27th September 2016	Delay in reporting closure of one bank account to NSE	NSE	Penalty	Delay in reporting closure of one bank account to NSE	5,000/-	The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under so far as it appears from my/ our examination of those records	We have reported the closure of the said bank account to all the Exchanges within the specified time ie within 7 days. Request submitted to NSE to review the penalty with relevant supporting documents.	Nil
2	Trading Member is required to inform about the technical glitch to the Stock exchanges immediately but not later than 1 hour from the time of occurrence of the glitch.	NCDEX Circular- NCDEX/RISK/010/2022 dated December 16, 2022	Delay in reporting technical glitch by 35 minutes	NCDEX	Penalty	Delay in reporting technical glitch by 35 minutes	50,000/-	The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under so far as it appears from my/ our examination of those records.	The processes have been strengthened for non-recurrence of such incidents	Nil





Sr. No	Observations/Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended 31.03.2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Annexure II	
					Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Nil	Nil	Circular	<p><b>a. Incorrect reporting of margin collected from clients Observation</b> Geojit reported incorrect margin collection to the exchange in the case of 88 instances involving a shortfall of Rs. 40.90 Lakhs as on December 09, 2021, and December 17, 2021.</p> <p><b>b. Passing of penalty to clients on account of short/non-collection of upfront margins Observation</b> The penalty charged by the clearing corporation on account of reporting short/non-collection of upfront margins by Geojit was levied to the client in case of 10 instances involving Rs 0.32 lakh as on December 09, 2021, and December 17, 2021.</p> <p><b>c. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation</b> Geojit did not report the early pay-in value to the Exchange in the case of 1 instance involving Rs 3,244 as on December 09, 2021.</p>	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory
2	Nil	Nil	Circular	<b>Non-settlement of clients' funds Observation.</b> Geojit did not settle the client's funds in the case of 09 instances, involving Rs.14.20 Lakhs as on January 31, 2022.	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory
3	Nil	Nil	Circular	<b>Incorrect data submitted towards the weekly monitoring of client funds Observation</b> Discrepancies were observed in the cash and cash equivalent submission and weekly enhanced supervision submission while reconciliation of the client balances.	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory
4	Nil	Nil	Circular	<p><b>a. Incorrect reporting of margin collected from clients Observation</b> Geojit reported incorrect margin collection to the exchange in the case of 18 instances involving a shortfall of Rs. 8.13 Lakhs for a period between February 25, 2022, February 28, 2022, March 11, 2022, and March 17, 2022.</p> <p><b>b. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation</b> Geojit reported incorrect PAN as part of cash and cash equivalent submission to the Exchange in a case of 1 instance as on February 25, 2022.</p>	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory
5	Nil	Nil	Circular	<p><b>a. Incorrect reporting of margin collected from clients Observation</b> Geojit reported incorrect margin collection to the exchange in the case of 09 instances involving a margin shortfall of Rs 65.25 Lakhs as on September 08, 2021 and September 17, 2021.</p> <p><b>b. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation</b> Geojit had the following discrepancies while reporting the client level cash and cash equivalent submission to the Exchange as on September 08, 2021, and September 17, 2021:</p> <p>i. Incorrect reporting of the peak ledger balance in case of 21 instances involving Rs 4.48 crores.</p> <p>ii. Incorrect reporting of the value of early pay-in and the peak ledger balance in the case of 5 instances involving Rs 72.19 lakhs and Rs.24.63 lakhs</p> <p>iii. Incorrect reporting of the ledger balance, peak ledger balance and value of early pay-in, in the case of 1 instance involving Rs 6.47 lakhs, Rs. 5.07 lakhs and Rs 0.008 Lakh</p>	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory





6	Nil	Nil	Circular	<b>Observation</b> HSB reported an incorrect margin collected from the client in one instance, for (UCC DNI1077) involving Rs 1.18 Lakhs as on October 21, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
7	Nil	Nil	Circular	<b>Incorrect reporting of margin collected from clients</b> <b>Observation</b> Geojit reported incorrect margin collected from the client in 1 instance (UCC JZK133), involving Rs 0.03 lakh, as on October 07, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
8	Nil	Nil	Circular	<b>Incorrect reporting of margin collected from clients</b> <b>Observation</b> Geojit reported incorrect margin collected from the client in the case of 1 instance (UCC HKJ141), involving Rs 0.49 lakh, as on October 28, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
9	Nil	Nil	Circular	<b>i. Incorrect reporting of margin collected from clients</b> <b>Observation</b> Geojit reported incorrect margin collection to the exchange in the case of 10 instances involving a shortfall of Rs 0.53 Crores as on September 24, 2021 and September 29, 2021 <b>ii. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances.</b> <b>Observation</b> Geojit had following discrepancies while reporting the cash and cash equivalent submission to the Exchange as on September 24, 2021, and September 29, 2021 i. Incorrect reporting of the peak ledger balance to the Exchange in case of 18 instances involving Rs 3.72 crore ii. Incorrect peak ledger balance to the Exchange and value of the Early Pay-In in the case of 8 instances involving Rs 1.09 crore	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
10	Nil	Nil	Circular	<b>Non-settlement of clients' funds and securities</b> <b>Observation</b> Geojit did not settle the client funds in the case of 28 instances involving Rs 1.34 crores as on March 31, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
11	Nil	Nil	Circular	<b>Non-settlement of clients' funds and securities</b> <b>Observation</b> Geojit did not settled the client accounts in the respective quarter as on February 04, 2022, February 11, 2022, and February 25, 2022, in the case of 03 instances involving Rs 8.63 Lakhs	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
12	Nil	Nil	Circular	<b>Incorrect data submitted towards weekly client-level Holding Statement, cash and cash equivalent and bank account balances.</b> <b>Observation</b> Geojit not reported the Cash and Cash Equivalent balances in case of 1 instance during the period July 30, 2022, to September 28, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
13	Nil	Nil	Circular	<b>Non-settlement of clients' funds and securities</b> <b>Observation</b> Geojit failed to settle the client funds who haven't traded in the last 30 days as on May 31, 2022, in 10 instances amounting to Rs 8.19 lakhs <b>Incorrect data submitted towards Client level Cash &amp; Cash Equivalent and Bank account Balances</b> <b>Observation</b> Geojit not reported the financial ledger balance (clear) B in cash and cash equivalent submission to the Exchange in the case of 19 instances involving as on May 1, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
14	Nil	Nil	Circular	<b>Incorrect reporting of margin collected from clients</b> <b>Observation</b> Geojit reported incorrect margin collection to the exchange in the case of 05 instances involving a shortfall of Rs 2.21 Lakhs as on July 22, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory





15	Nil	Nil	Circular	<b>Incorrect reporting of margin collected from clients</b> <b>Observation</b> Geojit reported incorrect margin collected from the client in 7 instances, involving Rs.0.79 Lakh as on July 29, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
16	Nil	Nil	Circular	<b>Non-settlement of client funds and securities</b> <b>Observation</b> Geojit did not settle the client funds in the case of 03 instances, involving Rs.1.08 Crore	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
17	Nil	Nil	Circular	<b>Non-settlement of client funds and securities</b> <b>Observation</b> Geojit did not settle the client funds in the case of 30 instances, involving Rs.1.07 Crore as on June 30, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
				<b>Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation</b> Geojit failed to report the cash and cash equivalent file to the Exchange, in case of 04 instances as on various dates between May 2022 to June 2022		
18	Nil	Nil	Circular	<b>Non-settlement of clients' funds</b> <b>Observation</b> Geojit did not settle the client funds who have not traded in the last 30 days in case of 25 instances, involving Rs.0.12 crores as on August 30, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
19	Nil	Nil	Circular	<b>LO-1</b> 1. Geojit incorrectly reported peak ledger balance in case of 12 out of 40 instances selected for sample scrutiny, involving Rs. 1.74 crores 2. Geojit incorrectly reported the margin in case on 19 out of 40 instances amounting to Rs.0.48 crores selected for sample scrutiny. <b>LO-2</b> 1. Peak ledger balance under-reported to the Exchange in case of 30 out of 60 instances involving Rs. 3.79 Crores 2. Clear ledger balance not reported to the Exchange in case of 5 out of 60 instances involving Rs. 26.78 Lakhs 3. Incorrect reporting of margin collected from clients, in case of 16 out of 60 instances, involving Rs.0.47 crores <b>LO-3</b> 1. Incorrect ledger B balance reported to the exchange in case of 05 out of 60 instances and also observed a shortfall in margin reporting to the exchange amounting to Rs. 0.02 Crores 2. Incorrect peak financial ledger balance (Clear) reported to the exchange in case of 27 out of 60 instances 3. Incorrect reporting of margin collected from clients, in case of 17 out of 60 instances involving to Rs. 0.37 crores	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
20	Nil	Nil	Circular	<b>a. Incorrect data submitted towards client level cash and cash equivalent balances and bank account balances. Observation</b> Geojit submitted incorrect data towards client level cash and cash equivalent balances in 2 areas as of July 23, 2021, and July 30, 2021, as under: Peak financial ledger balance in 18 out of 40 instances amounting to Rs.0.34 crore MTF ledger balance in 2 out of 40 instances amounting to Rs.0.09 crore <b>b. Incorrect reporting of margin collected from clients</b> <b>Observation</b> Geojit incorrectly reported margin collected from clients in 11 out of 40 instances selected for sample scrutiny amounting to Rs.0.39 crore	The processes have been strengthened for non-recurrence of such incidents	Satisfactory





21	Nil	Nil	Circular	<b>Incorrect data uploaded in the weekly holding statement Observations</b> Geojit had uploaded incorrect data towards weekly submission of holding statement in 1,186 instances amounting to Rs. 1,767.30 Crores as of March 19, 2021, March 22, 2021, and April 19, 2021	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
22	Nil	Nil	Circular	<b>Non-settlement of clients' funds and securities Observation</b> Geojit failed to settle the clients' funds and securities in 18 out of 100 instances selected for sample scrutiny (18% of the total sample instances) involving Rs 0.49 crores as of September 30, 2021	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
23	Nil	Nil	Circular	<b>Non-settlement of clients' funds and securities Observation</b> Geojit failed to settle the clients' funds and securities in 5 out of 106 instances selected for sample scrutiny (4.72% of the total sample instances) involving Rs 0.08 crores as of October 29, 2021	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
24	Nil	Nil	Circular	<b>Non-settlement of clients' funds and securities Observation</b> Geojit failed to settle the clients' funds and securities in 2 out of 100 instances selected for sample instances (2% of the total sample instances) involving Rs 0.02 crores as of November 30, 2021	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
25	Nil	Nil	Circular	<b>Incorrect reporting of margin collected from clients</b> Geojit has reported incorrect margin collected from the clients to Exchange, in the case of 52 instances involving a shortfall of Rs 0.15 Crores as on December 24, 2021, and December 31, 2021  <b>Member has passed penalty to clients on account of short/non-collection of upfront margins</b> Geojit has passed on short non-collection of upfront margins to the client in the case of 08 instances, as on December 24, 2021, and December 31, 2021	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
26	Nil	Nil	Circular	<b>Incorrect reporting of margin collected from clients</b> GEOJIT reported incorrect margin collected from the client to the exchange, in the case of 2 instances (Client Code - QUR071 and ACXR039) involving Rs 0.50 Lakh as on April 06, 2022	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
27	Nil	Nil	Circular	<b>Incorrect data uploaded towards weekly client level cash and cash equivalent and bank account balances.</b> Geojit has reported incorrect data towards weekly submission of cash and cash equivalent balances to the Exchange in case of 18 instances involving Rs. 2.77 Crores as on July 09, 2021, and July 16, 2021	The processes have been strengthened for non-recurrence of such incidents	Satisfactory





28	Nil	Nil	Circular	<p><b><u>Incorrect data reported towards Client level Cash &amp; Cash Equivalent Balances and Bank Account Balances</u></b></p> <p><b><u>Observation</u></b></p> <p><b><u>LO-1</u></b> GEOJIT has reported incorrect data towards client level cash and cash equivalent balances and bank balances as on October 08, 2021, and October 13, 2021, as under: Incorrect peak financial ledger balance (clear) reported to the Exchange in the case of 21 instances involving Rs. 3.73 crores. Incorrect client PAN reported to the exchange in the case of 1 instance.</p> <p><b><u>LO-2</u></b> GEOJIT has reported incorrect data towards client level cash and cash equivalent balances and bank balances as on October 18, 2021, and October 29, 2021, as under: Incorrect financial ledger balance (clear) - B, reported to the Exchange in the case of 1 instance involving Rs. 0.0004 crores. Incorrect peak financial ledger balance (clear) - C reported to the Exchange in the case of 20 instances amounting to Rs. 10.35 crores.</p>	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory
29	Nil	Nil	Circular	<p><b><u>Non-Settlement of client funds &amp; Securities</u></b></p> <p><b><u>Observation</u></b> Geogit did not settle the client funds and securities in case of 17 instances involving Rs. 0.36 crores as on December 31, 2021.</p>	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory
30	Nil	Nil	Circular	<p><b><u>a. Incorrect reporting of margin collected from clients</u></b></p> <p><b><u>Observation</u></b> Geogit has incorrectly reported the margin collected from the clients to the Exchange in the case of 2 instances (UCC ACXJ001 and YGK116) involving Rs. 7,951.36 as on March 25, 2022.</p> <p><b><u>b. Incorrect data uploaded toward weekly client-level cash and cash equivalent and bank account balances.</u></b></p> <p><b><u>Observation</u></b> Geogit has reported incorrect financial ledger balance (clear) "B" while reporting cash and cash equivalent balances to the Exchange in the case of 93 instances involving Rs. 2.83 crores as on March 25, 2022.</p>	The processes have been strengthened for non-recurrence of such incidents.	Satisfactory





31	Nil	Nil	Circular	<p><b>a. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances.</b>  <b>Observation – LO1</b>  Geogit has reported incorrect data towards weekly submission of cash and cash equivalent ledger balances (clear) 'B' to the Exchange in the case of 1 instance involving Rs 0.01 crores as on February 04, 2022</p> <p><b>b. Incorrect reporting of margin collected from clients</b>  <b>Observation</b>  Geogit incorrectly reported the margin collected from the clients to the Exchange as under:  LO-1  In the case of 39 instances involving Rs 0.14 crores as on February 04, 2022  LO-2  In the case of 15 instances involving Rs 0.05 Crores as on February 08, 2022</p> <p><b>c. Non-mapping of all Backoffice/trading client codes (if any) with the unique client code (PAN), uploaded to the Exchange for clients</b>  <b>Observation – LO1</b>  Geogit has incorrectly reported client PAN to the Exchange UCC in the case of 1 instance as</p>	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
32	Nil	Nil	Circular	<p><b>Non-Settlement of client funds</b>  <b>Observation</b>  Geogit did not settle the client funds in case of 06 instances involving Rs 0.14 crores as on November 18, 2021 and November 26, 2021</p>	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
33	Nil	Nil	Circular	<p><b>1. Client registration documentation / Anti Money Laundering compliance</b>  1(z) Member has not uploaded the KYC data with CKYCR in respect of all existing individual accounts (i.e. accounts opened prior to the Audit period).  19c Member has complied with the qualifications violations made in latest half yearly Internal Audit report</p>	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
34	Nil	Nil	Circular	<p><b>1. Client registration documentation / Anti Money Laundering compliance</b>  1(z) Member has not uploaded the KYC data with CKYCR in respect of all existing individual accounts (i.e. accounts opened prior to the Audit period)</p>	The processes have been strengthened for non-recurrence of such incidents	Satisfactory
35	Nil	Nil	Circular	<p><b>1. Client registration documentation / Anti Money Laundering compliance</b>  1(z) Member has not uploaded the KYC data with CKYCR in respect of all existing individual accounts (i.e. accounts opened prior to the Audit period)  3(h) Trail of bounced mails is maintained and physical delivery is ensured in case of bounce mails for ECNs within stipulated time (24 hours)</p>	The processes have been strengthened for non-recurrence of such incidents	Satisfactory

