

made and a liquidation occurs when a firm fails and cash and/or securities are missing from customer accounts.

When starting a liquidation, SIPC asks the court to appoint a Trustee to liquidate the firm and protect its customers. In larger cases, the Trustee usually is a lawyer with experience in bankruptcy and securities law. In smaller cases, SIPC may be appointed as Trustee. In the smallest brokerage firm failures, SIPC deals directly with customers, outside of court, in a Direct Payment Procedure.

Workflows: What happens when anyone in the ecosystem stops business

If Brokerage ceases to exist

1. Stockal will facilitate the movement of customer assets to another broker where Stockal has a relationship
2. Customer will also have the ability to move accounts directly at the brokerage but it's generally not needed
3. If brokerage account cannot be moved or liquidated (due to Custodian also going out of business), SIPC will appoint a Trustee and follow due process.

If Stockal ceases to exist

1. Stockal will arrange for direct contact between its customers and their respective brokers (relevant contact information is always directly made available even when Stockal exists),
2. All trade confirmations and regulatory statements are sent to customers directly by the brokerage firm – all the time. So customers have constant access to their brokerage account,
3. Customers can access and operate their accounts at the brokerage front-end and/or liquidate their accounts and/or move to a different brokerage by coordinating directly with the brokerage. Stockal shall also facilitate the process if needed.

KYC and FATCA Compliance Responsibilities

1. As a referrer, Geojit is not liable and responsible for customer KYC procedures.
2. KYC, AML, FATCA compliance is undertaken by and fulfilled by the US Brokerage partner involved – Drive Wealth LLC in this case
3. Stockal's responsibility is to facilitate KYC by providing digital infrastructure
4. Regulatory reporting requirements are at the foreign regulator (SEC and FINRA) and at the Indian bank. These are managed by the US brokerage and the respective Indian banks. Stockal facilitates as and when needed, by providing relevant data to all.

Investor profiling

1. Mandatory investor profiling is automatically completed while opening the brokerage account with US Broker
2. Facilitation for profiling is done by Stockal (by gathering requisite information from the investor)
3. Final approval/rejection and filing is done by the US broker
4. *Any and all products that are not allowed by the RBI are periodically monitored by Stockal and removed from the platform if required. The final responsibility of **not investing** in any disallowed product lies with the investor.*

US Broker Credentials

FINRA Brokercheck: <https://brokercheck.finra.org/firm/summary/165429>

DRIVEWEALTH, LLC
(DRIVEWEALTH, LLC, MYSOLOMEO, LLC)
CRD#: 165429/SEC#: 8-69161

B Brokerage Firm Regulated by **FINRA**
(Woodbridge district office)

MAIN ADDRESS
97 MAIN STREET
SECOND FLOOR
CHATHAM, NJ 07928 USA

Relationship Summary

0 Disclosures

Approved
12/02/2013
SEC Registration Status

Limited Liability Company
Company Type

SEC 1 Self-Regulatory Org
53 U.S. States & Territories

General Information

Main Office Location	97 MAIN STREET SECOND FLOOR CHATHAM, NJ 07928 USA	Established in	New Jersey since 05/24/2012
Mailing Address	97 MAIN STREET SECOND FLOOR CHATHAM, NJ 07928 USA	Type	Limited Liability Company

Exhibit 4

Regarding Risks to Geojit

Business

1. All accounts are cash accounts, so there is not margin that Geojit (or US broker or Stockal) will provide to the customer
2. RBI does not allow any speculative investments under LRS so the platform does not provide derivative products, futures and options and therefore none of the platform partners carry any risk on that front
3. All accounts are DIY (Do IT Yourself) accounts, so Geojit will not be placing trades on behalf of customers and does not carry the risk of being targeted with false or malicious claims with regards to order placement
4. Geojit is not liable for advisory services because advisory, as and when made available on the platform, will be offered by separately regulated advisory firms

Compliance

5. Foreign investments do not come under the purview of SEBI so there are no obligations of Geojit to SEBI with regards to managing investors who make overseas investments
6. Stockal has a SEBI registered advisory entity and shall be reporting to SEBI in case the platform provides any advice to any investor (which it doesn't, as of now)
7. Taxation is not an item that Geojit has to support or handle for its customer, for following reasons:
 - a. There is not capital gains tax **in the US** for foreign investors. All funds are credited, as-is to the investor's accounts and investor can freely repatriate such funds to his/her Indian (or any jurisdictional) bank account. Geojit is not required to do any reporting in this respect
 - b. Dividend payments are credited to the investor's account after US tax withholding automatically. This is handled by the US broker and facilitated by Stockal. Investor can request for tax-paid acknowledgement directly on the Stockal platform. Geojit has no role to play in this respect either.

Currency

8. Currency conversion is a subject of bank authorized remittances only and so Geojit does not bear any risk on currency fluctuations
9. Investors can plan their remittances to and back from their investing accounts based on their preferred currency rates.

Geojit Disclaimer

All investments involve risk and the past performance of a security, or financial product does not guarantee future results or returns. Keep in mind that while diversification may help spread risk it does not assure a profit, or protect against loss, in a down market. There is always the potential of losing money when you invest in securities, or

other financial products. Investors should consider their investment objectives and risks carefully before investing. Investors should be aware that system response, execution price, speed, liquidity, market data, and account access times are affected by many factors, including market volatility, size and type of order, market conditions, system performance, and other factors.

Geojit Financial Services Ltd “GFSL” makes no warranties or representations, express or implied, on products and services offered through the platform. It accepts no liability for any damages or losses, however, caused in connection with the use of related services.

All information placed on Geojit.com website (and any associated mobile apps and other digital properties owned by GFSL) is for informational purposes only and does not constitute as an offer to sell or buy a security. Further, any information on the website is not intended as investment advice. Certain hyperlinks or referenced websites on the Site, if any, are for your convenience and forward you to third parties’ websites, which generally are recognized by their top level domain name. Any descriptions of, references to, or links to other products, publications or services does not constitute an endorsement, authorization, sponsorship by or affiliation with GFSL with respect to any linked site or its sponsor, unless expressly stated by GFSL. Any such information, products or sites have not necessarily been reviewed by GFSL and are provided or maintained by third parties over whom GFSL exercise no control. GFSL expressly disclaim any responsibility for the content, the accuracy of the information, and/or quality of products or services provided by or advertised on these third-party sites.

GFSL’s role here is limited to that of a Referrer. GFSL will introduce the customer with the platform provider Stockal, which is integrated with third-party US stock broker DriveWealth, LLC (or any other such third-party brokers as may be integrated into Stockal from time-to-time). Once customers have been referred, they are solely

responsible for any and all orders placed by them, and understand that all orders are unsolicited and based on their own investment decisions. GFSL and any of its employees, agents, principals, or representatives DO NOT: provide recommendations of any security, transaction, or order; provide investment advice; produce or provide research to any user regarding any security, transaction, or order; handle funds or securities related to securities orders or effect the clearance or settlement of a user's trades done through Stockal.com provided by Stockal Inc. and DriveWealth, LLC. All processes including KYC will be executed by DriveWealth, LLC & Stockal directly with client and GFSL will not incur any personal financial liability.

There are a few deterrents and risks as well when it comes to overseas investing. The biggest risk is the currency fluctuations that would directly affect the returns. The cost involved in making such investments, intermediary charges and the taxation structure are also a deterrent if not a risk as these factors impact the overall return.

Investment in securities market are subject to market risks, read all the related documents carefully before investing.

For any further details regarding Stockal, please check www.stockal.com

For the background of US brokerage provider, DriveWealth, LLC please check its FINRA listing at <https://brokercheck.finra.org/firm/summary/165429>