



Beeline Broking Limited

CIN No : U51900GJ2014PLC080598

INTERNAL CONTROL PROCEDURES

We, Beeline Broking Limited had adopted following Internal Controls which will reasonably protect our operations, clients, investors and also protect us from financial loss arising from theft, fraud, and other dishonest acts, professional misconduct or omissions.

1. **Segregation of duties:** We will separate the functions of employees involved in the transaction process. For example, the person who approves a transaction should not be the same person who records it in the books of accounts.
2. **Dual control:** Certain transactions, such as the transfer of funds or securities, should require two or more people to complete them. This ensures that no single person has complete control over the transaction.
3. **Authentication procedures:** We will implement strong authentication procedures to prevent unauthorized access to the system. For example, the use of passwords, biometric identification, and two-factor authentication can help ensure that only authorized personnel can access the system.
4. **Regular auditing:** We will conduct regular audits of its operations to ensure that our internal control procedures are effective. Audits can also identify any weaknesses in the system that need to be addressed.
5. **Training and awareness:** We will provide training and awareness programs to our employees to educate them about the importance of internal controls and how to identify and report suspicious activities.
6. **Monitoring and reporting:** We will implement a system to monitor and report suspicious activities. This can include the use of software to identify unusual transaction patterns, such as large transactions or transactions outside of normal business hours.
7. **Compliance monitoring:** We will have a compliance monitoring function to ensure that all regulatory and legal requirements are being met. This can help prevent professional misconduct and omissions.
8. **Risk management:** We will have a robust risk management framework to identify, assess, and manage risks effectively. This can help to prevent financial loss arising from unexpected events.



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9. Honesty, Integrity, Fairness and Accountability

The Directors and Senior Management are entrusted with the responsibility to oversee and formulate the policies for the management and affairs of the Company. Therefore in the interest of good corporate governance they shall conduct their activities, on behalf of the Company and on their personal behalf, with honesty, integrity and fairness. All of them must act in good faith with honesty and accountability and with due care, competence and diligence.

10. Conflict of Interest

The Directors and Senior Management shall not engage in any activity, business, or relationship, which may be in conflict with the interest of the Company or prejudicial to the Company's interest. They should avoid transacting company business with their relative or with a firm / company in which either they themselves or their relative are interested or plays any significant role and in case such related party transaction is unavoidable, it must be made only after proper and fullest disclosure to the Board.

The Directors and Senior Management shall also not accept gifts from persons or firms who deal with the Company where the gift is being made in order to influence the director's actions as a member of the Board, or where acceptance of the gift could create the appearance of a conflict of interest.

In addition to these internal control procedures and capabilities, we will also have adequate financial and operational capabilities to support our operations. This includes having sufficient capital, technology infrastructure, and skilled personnel to manage risks effectively.

By implementing these internal control procedures, we can reduce the risk of financial loss, theft, fraud, and other dishonest acts. However, it is important to note that no system is foolproof, and we will remain vigilant to new threats and adapt our internal control procedures accordingly.

Suspected violations of the Code must be reported to the Chairman of the Board. All reported violations would be appropriately investigated and action will be taken on the conclusion of the enquiry by the Board which may even include a request to resign as Director or Senior Management of the Company, if permitted by applicable laws and is in the best interest of the Company.

The board of directors of the Company reserves the right to modify and/or amend the Code at any time.