



Ref No. : MSE/INS/RE/10/11/19-20/386

March 09, 2020

To

Sagun Marketing Pvt. Ltd.
54/1, 1st Floor, Pipalwali Kothi,
Nayaganj, Kanpur –208 001
Tel: 091-0512-3294706/2364811

Kind Attn: Ms. Sanjoli Khemka – Compliance Officer

Madam,

Sub: Action on violations observed during Inspection of books of accounts conducted in financial year 2019-20 (Currency Derivatives Segment).

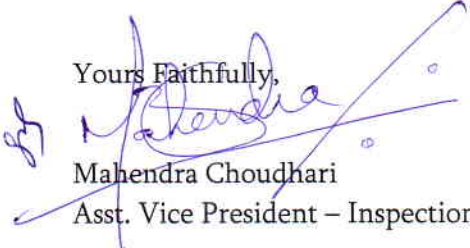
An inspection of your books of accounts and other documents was conducted by the Exchange in December 2019 for the period from October 01, 2018 to September 30, 2019 and observations on the same were forwarded to you vide letter no. Ref: MSE/INS/RE/07/11/19-20/40 dated January 07 2020 for your comments/clarifications on the non-compliances observed therein. Your reply was received by Exchange vide e-mail dated February 06, 2020. The said reply was analyzed and placed before the Internal Committee of the Exchange in its meeting held on February 25, 2020.

The actions as decided by the ICMR on violations/deficiencies pointed out in the observation letter are enclosed as **Annexure**. Please note the actions includes a monetary fine of Rs. 7,250/-.

You are advised to send a Cheque/Demand Draft payable in Mumbai in favour of 'Metropolitan Stock Exchange of India Ltd' for Rs. Rs.8,555/- (Rupee Eight Thousand Five hundred and Fifty Five only), including GST @ 18% latest by March 24, 2020 or you can pay the said amount by way of online fund transfer, details of the bank for fund transfer is given below and provide fund transfer details to the Exchange :

Particulars	Details
Beneficiary Name	Metropolitan Stock Exchange of India Ltd
Bank & A/c No details	990680013757 / Current A/c / HDFC Bank Ltd, Fort Mumbai
IFSC Code	HDFC00000060

Yours Faithfully,


Mahendra Choudhary
Asst. Vice President – Inspection

Encl: As above

Annexure

Metropolitan Stock Exchange of India Limited

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Sagun Marketing Pvt. Ltd.
Currency Derivatives Segment

Sr. No	Violation	Details	In Violation of	Action
1.	Discrepancies pertaining to settlement of clients account	-	- Exchange Circular No. MCX-SX/INSP/238/2009 dated December 4, 2009 - Exchange Circular No. MCX-SX/INSP/296/2010 February 25, 2010 - Exchange Circular No. MSEI/INSP/4554/2016 dated September 28, 2016 - Exchange Circular No. MSEI/INSP/4799/2016 dated December 22, 2016	You are advised to ensure compliance in future
2.	The Daily Margin Statements sent to the clients w. e. f. July 1, 2018, were not as per prescribed format	-	Exchange Circular No. MSE/INSP/6511/2018 dated June 29, 2018	Your reply is satisfactory
3.	Trading terminal operated by the approved user without valid certification	-	- Regulation No. 2.2.3 of the (CD Segment) of the Exchange - Exchange Circular No. MCX-SX/MEM/2576 dated January 21, 2015	A penalty of Rs. 2250/- is levied. Due to repeat violation, 50% escalation clause applicable. (Rs 1500 + 50% = 2250/-).
4.	Non-submission of documents pertaining to online registration with FIU-India	-	- SEBI Circular no. ISD/AML/CIR-1/2009 dated September 01, 2009 - Exchange Circular No. MSEI/INSP/3437/2015 dated October 12, 2015	Your reply is satisfactory
5a.	Non-Submission of data towards weekly Clients' Funds Lying with the Stock Broker under Enhanced Supervision	-	- Exchange circular no. MSEI/INSP/4554/2016 dated September 28, 2016 - Exchange circular no.	A penalty of Rs. 5,000/- is levied (Due to repetitive nature of discrepancy, warning



METROPOLITAN STOCK EXCHANGE
Sagun Marketing Pvt. Ltd.

Currency Derivatives Segment

Sr. No	Violation	Details	In Violation of	Action
5b.	Non-Submission of data towards Periodic Client's Funds and Securities Balance under Enhanced Supervision.	-	MSE/INSP/7803/2019 dated June 21, 2019	escalated to penalty.) Your reply is satisfactory

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