

To,
Bhagvati Investment
D/216, Kamdhenu Complex
Ambavadi, Ahmedabad – 380 015
Tel: 091-079-26308623

Kind Attn: Mr. Amulakh N. Tanna - Compliance Officer

Dear Sir,

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 January – 2020 for the period from July 01, 2018 to June 30, 2019 and observations on the same were forwarded to you vide letter no MSE/INS/RE/07/96/19-20/173 dated February 03, 2020 for your comments/clarifications on the non-compliances observed therein. Your reply was received by Exchange vide e-mail dated February 06 2020, which was analyzed and placed before the Internal Committee of the Exchange in its meeting held on February 25, 2020.

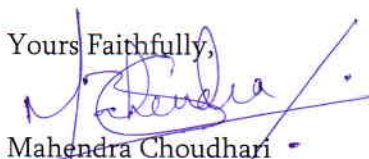
The actions as decided by the ICMR on violations/deficiencies pointed out in the observation letter are enclosed as **Annexure**. Please note the actions includes a monetary fine of Rs.7,500/-.

In view of the above a penalty of Rs. 8850 /- (Rupee Eight Thousand Eight Hundred and Fifty only), including GST @ 18% is payable, accordingly you are advised to maintain the required balances in the Exchange Dues Account so as to enable the Exchange to debit the aforesaid amount on 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	HDFC0000060

Or you can also send a Cheque/Demand Draft payable at Mumbai in favor of “Metropolitan Stock Exchange of India Ltd.” for the said amount.

Yours Faithfully,


Mahendra Choudhary
Asst. Vice President – Inspection

Encl: As above

<u>Bhagvati Investment</u> <u>Currency Derivatives Segment</u>				
Sr. No	Violation	Details	In Violation of	Action
1.	Non-submission of the NISM Series-IIIA certification, obtained by the compliance officer.	-	Exchange circular no. MCX-SX/INSP/1057/2013 dated March 13, 2013	A penalty of Rs.7,500/- to be levied. Due to repeat violation, 50% escalation clause applicable. (Rs.5,000 + 50% = 7,500/-)
2.	Delay in obtaining NISM Series VII - SORM certification by the persons supervising, the persons associated with handling of relevant functions	-	- Exchange Circular No. MCX-SX/INSP/ 491/2010 dated December 16, 2010 - Exchange Circular No. MCX-SX/INSP/2181/2014 dated September 03, 2014	You are advised to ensure compliance in future.