

Focus Shares & Securities Pvt. Ltd.

Policy on Handling of Good Till Cancelled Orders (GTC) for Clients

Introduction

This policy outlines the procedures and guidelines for handling Good Till Cancelled (GTC), Good Till Triggered (GTT), and similar types of orders offered by our firm to clients. This policy is formulated in compliance with the National Stock Exchange of India Limited (NSE) Circular Ref. No: NSE/INSP/62528 and aims to ensure consistency, transparency, and protection of investor interests.

Scope

This policy applies to all clients of who use GTC/GTT orders or similar types of orders. It details the validity of such orders, their handling in case of corporate actions, and communication protocols to clients.

Policy Details:

1. Order Validity

- Good Till Cancelled (GTC) Orders: These orders remain active until they are either executed or explicitly cancelled by the client.
- Good Till Triggered (GTT) Orders: These orders remain active until the specified trigger conditions are met, leading to order execution, or until they are cancelled by the client.

2. Handling of Orders During Corporate Actions

In the event of corporate actions (e.g., dividends, stock splits, mergers), the handling of GTC/GTT orders will follow these protocols:

- Cancellation: All pending GTC/GTT orders will be cancelled prior to the corporate action to prevent erroneous trades.
- Price Reset: Where applicable, orders may be adjusted to reflect new prices post-corporate action.
- Retention: If an order is retained post-corporate action, clients will be informed of the adjustmentsmade.

3. Client Communication

- **Notification Timeline**: Clients will be notified of upcoming corporate actions affecting their GTC/GTT orders no later than one day prior to the ex-date of the corporate action.
- Communication Channels: Notifications will be sent through email or other suitable mechanisms thatcan be
 preserved. In case of undelivered emails, alternate communication methods such as physical delivery, SMS,
 or electronic instant messaging services will be used, adhering to the safeguards prescribed in NSE Circular
 NSE/INSP/52604 dated June 10, 2022.

Integration with Account Opening Documents

- The policy will be included in the Account Opening Form/Kit under the heading "Policy on Handling of Good Till Cancelled Orders of Client" within the Policy and Procedures document.
- The policy will be made available to clients.

Policy Communication to Existing Clients

• Existing clients will be informed of this policy via email or other suitable mechanisms. If the initial communication is undelivered, alternative channels will be employed to ensure receipt.

Approval and Review

This policy is approved by Board of Directors and will be reviewed annually or as required in response to regulatory changes.