

## **Policy for identification of beneficial ownership of clients' accounts**

We undertake continuous on-going Client Due Diligence for Identification of Beneficial Ownership of Clients' Accounts, measures to an extent that is sensitive to the risk of Money Laundering and Terrorist Financing depending on the type of client business relationship or transactions done by the clients which may differ from case to case.

The CDD measures comprise the following:

- a) As part of our Client Acceptance Policy, we shall obtain sufficient information in order to identify persons who beneficially own or control the securities, Holdings, Commodities and Bank account. Whenever it is apparent that the Securities, Commodities acquired or maintained through an account are beneficially owned by a party other than the client, that party shall be identified using client identification and verification procedures. The beneficial owner is the natural person or persons who ultimately own, control or influence a client and / or persons on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person or arrangement.
- b) We shall verify the client's identity using reliable, independent source documents, data or information available in the public domain or through different ways including that of continuous interaction/Communication with the client based on the transactions and nature of Business.
- c) Whenever there arises a reasonable ground of suspicion that the transactions of a client are unusual or of unjustified complexity, illegitimate compared to the Income Range, Net worth, Occupation etc.. We shall identify the beneficial ownership and control of the client by examining the Bank statements, CommodityholdingsandDematstatementstoascertainandidentifythesourcesofinvestmentsandto come to a conclusion that the client is acting on his own.
- d) We shall verify the identity of the beneficial owner of the client and/or the person on whose behalf a transaction is being conducted, corroborating the information provided in relation to (c) above.
- e) Client Due Diligence and scrutiny is carried on an ongoing basis. i.e. Perform ongoing scrutiny of the transactions and account throughout the course of the business relationship to ensure that the transactions being conducted are in consistence with their Income, Net worth, source of Funds, Trading pattern, risk profile and our knowledge of the clients.
- g) We shall be periodically reviewing the documents, data or information of the clients and beneficial owners collected under the CDD process which include PAN Details, Valid Mobile number, valid email ID, Income details, Bank & DP details, Such periodic review will be based on the risk profile of the client, regulatory updates, abnormal trades or any other cause of suspicion. The income review would be at least once annually. The same would also be updated to the Exchanges and Depositories. In case the client doesn't submit the Six KYC attributes, the account would be deactivated/ Frozen for Deb its till such time the said KYC details are updated.
- h) To identify the genuineness of the client, In person verification of the client will be done by the Staff of our firm.

i) We would depend on the third party CDD, who is a SEBI registered Intermediary only to the extent of identification and verification of the identity of BO.

j) However we have our own independent methods of analyzing the Clients, based on their trading pattern, Frequent Pledge / Un pledge, dealing in illiquid stocks, Futures, options, single stock, Placing matching orders, trading beyond their Net worth, Financial ability etc... Such CDD will help us on the non reliance of third party CDD.

k) For Corporates, Trusts, partnership firms, societies (All Non Individual Accounts), KYC of all the Directors/Promoters/Authorised Persons/Partners/trustees etc..will be obtained to identify the ultimate Beneficiary ownership.

l) All accounts where there is no single transaction in an year will be termed as Dormant or Inactive Accounts and such accounts shall be flagged and UCC will be deactivated and suspended for transactions. Such accounts are monitored very closely and can be activated only after ascertaining the Beneficiary Ownership of the client, after updating the required KYC Documents.

#### **For clients other than individuals:**

Where the client is a person other than an individual or trust, viz., corporate Body, partnership firm, LLP, AOP, unincorporated association/body of individuals, we shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the following information: We shall verify the identity of the beneficial owner of the client and/or the person on whose behalf a transaction is being conducted, corroborating the information provided by the client.

1.) Where the client is a Company/Corporate/LLP, the Beneficial Owner is the natural person(s), who, whether acting alone or together, or through one or more juridical person, has a controlling ownership interest or who exercises control through other means.

"Controlling ownership interest" means ownership of or entitlement to more than **Ten** percent of shares or capital or profits of the company.

2.) Where the client is a Partnership Firm, the Beneficial Owner is the natural person(s) who, whether acting alone or together, or through one or more juridical person, has ownership of/entitlement to more than **Ten percent** of capital or profits of the partnership or who exercises control through other means.

3.) Where the client is an unincorporated association or body of individuals, the beneficial owner is the natural person(s), who, whether acting alone or together, or through one or more juridical person, has ownership of or entitlement to more than **fifteen percent** of the property or capital or profits of such association or body of individuals,

4.) Where no natural person is identified under (1) or (2) or (3) above, the beneficial owner is the relevant natural person who holds the position of senior managing official;

5.) Where the client is a trust, the identification of beneficial owner(s) shall include identification of the author of the trust, the trustee, the beneficiaries with **ten per cent** or more interest in the trust, settler, protector and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.

6.) Where the client or the owner of the controlling interest is an entity listed on a stock exchange in India, or it is an entity resident in jurisdictions notified by the Central Government and listed on stock exchanges in such jurisdictions notified by the Central Government, or it is a subsidiary of such listed entities, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such entities.

7.) Applicability for foreign investors: Registered intermediaries dealing with foreign investors' may be guided by SEBI Master Circular SEBI/HO/AFD-2/CIR/P/2022/175 dated December 19, 2022 and amendments thereto, if any, for the purpose of identification of beneficial ownership of the client.

8) Where the identity of the beneficial ownership of the client and/or the person on whose behalf transaction is being conducted is still unidentifiable, We shall identify the same corroborating their formation provided.

We shall analyse the ownership and control structure of the client by reviewing all the necessary documents to identify the ultimate beneficiary ownership on an ongoing process.