

# Client Acceptance Policy

## 1. Client identification

Before opening any Trading account with us, the following measures shall be taken:

- In person verification of the client
- Identify beneficial ownership and control, i.e., determine the persons who beneficially own / control the account.
- Collect information about client's background, occupation and also check the name of the introducer.
- Collect and verify all original documents from the client.
- Collect a certified copy of valid documents showing details of his permanent address, current address, PAN, nature of his occupation, financial status and also a recent photograph.
- For clients trading in F&O segment, documentary proof of his financial details will be collected.
- In case of Corporate client, collect copies of certificate of incorporation, Memorandum of association and other documents as required by SEBI
- In case of Corporate client, collect adequate information of the persons authorized to deal on behalf of the company.
- Prior experience in stock market

## 2. Client Categorisation

Each client will be marked into 3 categories, High Risk, Medium Risk and Low Risk from the point of view of the anti money laundering laws. The categorization will be made based on the following parameters/ factors of risk perception:

- High Networth Clients
- Trusts/ NGOs / Charities receiving donations
- Companies having close family shareholdings (The above are considered of High Risk as per SEBI guidelines) The other parameters are nature of business activity, trading turnover, manner of making payment etc. Provision will be made in the back office software for noting categorization of each client. The high-risk client will require regular KYC update.

The clients will be placed under low, medium and high-risk category based on their turnover per day. Corporates / HNIs having respectable social and financial standing, Clients who make payment on time and take delivery of shares can be considered as Low

### 3. **Suspended Persons**

SEBI and other authorities suspend or debar persons / entities from participating in securities market on several instances. We as a Broker are required to ensure that such persons do not trade through us.

We shall lay down systems for identifying transactions which is not in consonance with the financial status declared/ shown by the client. Also, unusual activities compared to past transactions, sudden activity in dormant accounts, activity inconsistent from declared business activity, should be traced. This shall require appropriate changes in our back office software.

Systems shall be put in place for identifying transactions likely to be market manipulation, and which appears to be insider trading and also any transaction which seems to have no bonafide intention. Regular communications by means of mailers, SMS, Email are sent to clients at various intervals requesting them to update their latest financial and KYC details available with us.

Role of Compliance Team & Internal Audit: The compliance team will play an important role in ensuring compliance of the above policies and procedures. The account opening team will exercise adequate due diligence as stated above. There will be periodic checking by the Principal Officer.

Here is a system of concurrent audit, which will also include ensuring compliance of the

- Due diligence in KYC norms.
- Generation of exception reports
- Trading in dormant client codes
- Level of awareness of staffs