

## KYC Policy

### **For the purpose of KYC policy, a customer may be defined as:**

A person or entity that maintains an account and/or has a business relationship with BrokerMasters on whose behalf the account is maintained (i.e. the beneficial owner)

Beneficiaries of transactions conducted by professional intermediaries, such as stock BrokerMasters's, chartered accountants, solicitors etc. as permitted under the Law. Any person or entity connected with a financial transaction, which can pose significant reputation or any other risks to BrokerMasters, say, a wire transfer or issue of high-value demand draft as a single transaction.

KYC policy includes the following eight key elements – customer identification procedures, monitoring of transactions, risk management, training program, internal control system, record keeping, and evaluations of KYC guidelines by internal audit and inspection system, duties/responsibilities and accountability. The KYC documents have to be provided not later than 4 working days after the account activation, otherwise we keep our rights to terminate all existing deals and restrict future trades.

An effective KYC program is put in place by BrokerMasters, establishing an appropriate procedure and ensuring their effective implementation. It covers proper management oversight, systems and controls, segregation of duties, training and other related matters. Responsibility is explicitly allocated within the company for ensuring that the company's policies and procedures are implemented effectively.

The nature and extent of due diligence depend on the risk perceived by the BrokerMasters customer profile. BrokerMasters internal audit and compliance have an important role in evaluating and ensuring adherence to the KYC policies and procedures. The compliance function provides an independent evaluation BrokerMasters own policies and procedures, including legal and regulatory requirements. It ensures that the audit machinery is staffed adequately with individuals who are well versed in such policies and procedures. Internal inspectors specifically check and verify the application of KYC procedures at the branched/offices and comment on the lapses observed in this regard.

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