

**Maheshwari Equity Services (P) Limited
Kolkata – 700 001**

Internal Control Policy

FOR

Corporate Clients / Non Individual Clients

Of

**Maheshwari Equity Services (P) Limited
*(Stock Broking Services)***

Maheshwari Equity Services (P) Limited
Kolkata – 700 001

There are three specific parameters, related to Client Due Diligence Process:

1) Policy for acceptance of Clients –

- a) Obtaining sufficient in order to identify persons who beneficially own or control the account
- b) Verify the Client's identify using reliable, independent source documents, date or information and verify the identity of the beneficial owner of the customer and/or the person on whose behalf a transaction is being conducted.
- c) Documentation requirement and other information to be collected along with KYC, Clients are clearly defined having regard to Client's location, nature of business activity, trading turnover etc.
- d) Companies having close family, sister concern shareholding or beneficial ownership

2) Procedure for identifying the Corporate Clients

- a) In person Verification should be clearly verified by the Authorised person of the Company by using reliable sources including documents/ information. The Authorised person should verify the address of the Client, Balance sheet of clients, Registered Authorise Person's Mobile No. of clients with supporting documents.
- b) For Existing Clients should be carried out by the compliance department once in every 6 months by way of conducting In Person verification and collecting the various documents (Bank Statement, Demat Statement, Form 32 etc) from the clients and yearly Balance Sheet and share holding pattern from the clients.

3) Transaction Monitoring and Record Keeping

- a) Regular monitoring the nature, volumes and amount of Transaction
- b) All necessary records on transactions shall be maintained at least for the minimum period
- c) All Trade should be verified through the Tele calling system
- d) Any Transaction resulting into delivery of above 2 Lacs, other than A Group shares will be monitored by the Director / Authorised Person of the Company.