BENEFICIAL OWNERSHIP POLICY

Introduction

Vridhi Capital & Finance Private Limited ("VRIDHI" or "the Company") is a SEBI-registered Stock Broker and Depository Participant. The Company is committed to complying with the provisions of the Prevention of Money Laundering Act, 2002 (PMLA), the Prevention of Money Laundering (Maintenance of Records) Rules, 2005, SEBI Master Circulars, and other applicable regulatory guidelines relating to Know Your Client (KYC), Anti-Money Laundering (AML), and identification of Beneficial Ownership.

This policy has been framed to establish a robust mechanism for identifying and verifying the Beneficial Owner(s) of clients onboarding with the Company.

Objective

The objective of this Policy as per the SEBI circular No. CIR/MIRSD/2/2013 dated 24.01.2013 has been defined as the natural person(s) who ultimately own, control, or influence a client and/or on whose behalf a transaction is conducted. The policy also aims to identify any person exercising ultimate effective control over a legal person or legal arrangement.

The Company shall obtain, verify, and maintain Beneficial Ownership information as part of the client due diligence process in accordance with applicable laws and regulatory requirements.

Identification of Beneficial Ownership

The Company shall collect all prescribed KYC documents and information required under SEBI and PMLA regulations for identifying the client and the Beneficial Owner(s).

The information obtained shall be verified using official documents, regulatory databases, and other reliable sources, wherever applicable.

The following procedures shall be followed based on the constitution of the client.

Beneficial Ownership – Entity-wise Procedures

A. Companies

For clients incorporated as Companies:

- The shareholding pattern and management structure shall be examined.
- Natural person(s) holding controlling ownership or exercising effective control over the company shall be identified.

- Where an individual holds more than **25%** of the shares, capital, or profits of the company, such individual shall be treated as the Beneficial Owner.
- Where no natural person is identified through ownership, the individual exercising control through other means or the senior managing official shall be identified.
- Additional declarations or supporting documents may be obtained whenever considered necessary.

B. Partnership Firms

For Partnership Firms:

- The Partnership Deed shall be examined.
- Partner(s) holding more than **15%** of the capital or profits shall be identified as Beneficial Owner(s).
- Where ownership alone does not establish control, additional information may be obtained to determine the person exercising effective control.

C. Trusts

For Trusts, the Company shall identify and verify:

- The Author/Settlor of the Trust;
- Trustee(s);
- Protector(s), wherever applicable;
- Beneficiaries having **15% or more interest** in the Trust;
- Any other natural person exercising ultimate effective control over the Trust through ownership or other means.

The Trust Deed and other supporting documents shall be examined for this purpose.

D. Association of Persons (AOPs) / Body of Individuals (BOIs)

The Company shall obtain all relevant constitutional and statutory documents.

Natural person(s) having more than **15% ownership, capital, profits, or controlling interest** shall be identified as Beneficial Owner(s).

E. Non-Resident Indians (NRIs)

For NRI clients, the Company shall collect KYC documents and additional documents prescribed under SEBI, RBI, FEMA, and PMLA regulations.

Beneficial Ownership shall be identified in accordance with the applicable regulatory requirements.

Cases Where Ownership Cannot Be Determined

Where no natural person can be identified based on ownership thresholds or where there is doubt regarding the controlling ownership, the Company shall identify the natural person exercising control through other means.

If no such individual can be identified, the identity of the Senior Managing Official (SMO) shall be obtained and recorded as per applicable regulatory guidelines.

Exemption for Listed Companies

The requirement to identify and verify the Beneficial Owner shall not apply where:

- the client is a company listed on a recognised stock exchange in India or an equivalent foreign jurisdiction; or
- the client is a majority-owned subsidiary of such a listed company,

provided such exemption is permitted under the applicable SEBI and PMLA regulations.

Foreign Investors

For Foreign Investors, Foreign Portfolio Investors (FPIs), and other eligible foreign entities, the Company shall follow the Beneficial Ownership requirements prescribed under applicable SEBI circulars, RBI regulations, FEMA, and PMLA guidelines.

Record Maintenance

The Company shall:

- maintain complete records of Beneficial Ownership information;
- update the records whenever there is any change in ownership or control;
- preserve records for the period prescribed under applicable laws and regulations;
- make such information available to regulatory authorities whenever required.

Implementation

The Beneficial Ownership details collected from clients shall be recorded and maintained in the Company's KYC and back-office systems.

The Compliance Department shall monitor compliance with this Policy and ensure periodic review of Beneficial Ownership information.

Roles and Responsibilities

The Compliance Officer shall be responsible for:

- implementation of this Policy;
- ensuring compliance with applicable SEBI and PMLA requirements;
- monitoring Beneficial Ownership documentation;
- reporting deficiencies to Senior Management;
- arranging periodic review and updating of records.

Policy Review

This Policy has been approved by the Board of Directors of Vridhi Capital & Finance Private Limited.

The Policy shall be reviewed periodically or whenever there is any amendment in applicable laws, SEBI regulations, PMLA provisions, or any other statutory requirement.

Policy Communication

A copy of this policy shall be made available to all the relevant staff/persons such as: compliance officer / department in-charge. Further, a copy of this policy has to be displayed on our website.

Last Reviewed on	Reviewed By	Approved By
02-04-2026	Compliance Officer	Management