

Client Onboarding & Client Acceptance Policy

Risk-based framework for client acceptance and onboarding — KYC and due diligence, risk classification, UCC and account activation, periodic refresh, record keeping and training.

1. Purpose

The purpose of this Policy is to establish a consistent, risk-based framework for accepting and onboarding clients of Vimal & Sons, while ensuring compliance with applicable SEBI, stock exchange, clearing corporation, depository, PMLA/AML, KYC and other regulatory requirements.

The Policy is intended to ensure that only appropriately identified and verified clients are onboarded; Vimal & Sons understands the client's identity, ownership, nature of business and risk profile; higher-risk clients receive enhanced due diligence; records are maintained; client accounts are monitored on an ongoing basis; and relationships presenting unacceptable or unmitigable risks are not accepted.

2. Scope

This Policy applies to all prospective and existing clients of Vimal & Sons and to all employees, officers, authorised persons and functions involved in client acquisition, KYC, account opening, compliance, operations, dealing and client monitoring.

3. Client Acceptance Principles

Vimal & Sons shall accept clients only on referral basis. No walk-in clients will be entertained.

4. KYC and Client Due Diligence

The onboarding process shall include the applicable KYC and client due-diligence controls before trading activation.

Vimal & Sons shall, as applicable:

1. obtain prescribed KYC information and supporting documents;
2. verify identity and address through permitted processes;
3. validate PAN and applicable KYC records;
4. check KRA/CKYCR records as required;
5. complete IPV/video IPV where applicable;
6. identify and verify beneficial owners for relevant non-individual clients;
7. verify bank account information;
8. obtain applicable FATCA/CRS declarations;
9. obtain nomination details or applicable opt-out instructions; and

10. obtain all prescribed account-opening agreements, rights and obligations and risk disclosures.

5. Client Risk Classification

Vimal & Sons shall classify clients considering customer type, ownership/control, geography, products/services, expected activity, source of funds/wealth where relevant, PEP/sanctions exposure, adverse information and other AML/operational risk indicators.

6. Clients Not to be Accepted

Vimal & Sons shall not onboard a prospective client where:

- identity cannot be satisfactorily established;
- mandatory KYC documentation cannot be obtained;
- beneficial ownership cannot be established where required;
- information supplied is materially false, inconsistent or unverifiable;
- the prospective client refuses mandatory KYC/AML information.

7. UCC and Account Activation

After completion of applicable onboarding requirements, the client shall be allotted the required Unique Client Code (UCC) and other account identifiers.

System controls should prevent trading activation until mandatory KYC, documentation, screening and approval controls are completed.

No employee or business function may manually bypass a mandatory regulatory control without a documented and authorised exception where such exception is legally permissible.

8. Periodic KYC Refresh

Vimal & Sons shall maintain processes for identifying when client information requires updating and shall obtain refreshed information within applicable regulatory timelines.

Material changes in address, contact details, bank account, occupation/business, constitution, authorised signatories, beneficial ownership, controlling persons or other material KYC information shall trigger appropriate review.

9. Record Keeping

Vimal & Sons shall maintain complete and accurate onboarding and KYC records, including information obtained, documents submitted, verification results, screening results, risk classification, approvals, exceptions, subsequent KYC updates and relevant monitoring/escalation records.

Retention periods shall comply with applicable PMLA, SEBI, exchange, depository and other regulatory requirements. Records shall be retrievable for regulatory, audit and internal review purposes.

10. Training and Awareness

Relevant employees and authorised persons shall receive periodic training on KYC, AML/CFT, client acceptance, red flags, sanctions/PEP screening, investor protection and escalation procedures.

11. Policy Review

This Policy shall be reviewed at least annually and earlier where there is a material change in applicable law, regulation, business model, products/services, risk profile or control environment.

The Compliance Officer shall document the review and place material amendments before the designated approval authority.

Signed: For Vimal & Sons — Partner

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Last reviewed: 31 August 2025.