



# Karuna

## POLICY ON IDENTIFICATION OF BENEFICIAL OWNERSHIP

The Company shall identify the Beneficial Owner and take all reasonable steps to verify the identity while putting in place a Client Identification Procedure and comply with the following guidelines :

1. **For Clients other than Individuals** : Where the Client is a person other than an individual or trust, viz., Company, partnership or incorporated association / body of individuals,, We shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons throughout the following information :
  - a) Identify the natural person who, whether acting alone or together or through one or more juridical person, Controlling ownership of/entitlement to :
    - i) More than 25% of shares or capital or profits of the juridical, where the juridical person is a company
    - ii) More than 15% of the capital or profits of the juridical person, where the juridical person is a partnership; or
    - iii) More than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association of body of individuals.
  - b) Identify the person with the controlling ownership interest can be exercised through voting rights, agreement, arrangements or in any other manner.
  - c) And where no natural person is identified under clauses a) or b) above, we identify the relevant natural person who holds the position the senior managing official.
2. **For client which is a trust** : We shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the identity of the settler of the trust, the trustee, the protector, the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.
3. **Exemption in case of listed companies** : It is not necessary to identify and verify of any shareholder or beneficial owner of Listed Companies.
4. **For Foreign Investors** : Company foreign investors' viz., Foreign Institutional Investors, Sub Accounts and Qualified Foreign Investors, may be guided by the clarifications issued vide SEBI circular CIR/MIRSD/11/2012 dated September 5, 2012, for the purpose of identification of beneficial ownership of the client.

**The Company is in to following Activities :**

- 1) **For New Clients** : We verify the all document as per clause 1), 2), 3) and 4), also maintained the same.
- 2) **For Existing Clients** : We Collect the Share Holding Patter annually and verify the same. If the client fails to provide documents then the client's account is treated as inactive or closed and a reminder for the same is send to the client.

For Karuna Financial Services Pvt. Ltd.

**KARUNA FINANCIAL SERVICES PVT. LTD.** Compliance Officer

Member : National Stock Exchange / Bombay Stock Exchange CIN No. U67120WB1994PTC065573

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