



Policy on Client Registration and Document Maintenance

Vajraaditya Ventures shall follow the below process for Client registration & document maintenance:

- The Client registration kit shall be filled up by the client.
- The documentary proof as required for KYC shall be collected.
- The financial proof such as ITR, bank statement shall be collected.
- Verify if the proof of address and identity & the financials are latest and up-to-date.
- Check if the client has affixed their signature at all the required places.
- The client registration kit shall be scanned.
- The client details shall be entered in the back-office system.
- UCC allotted.
- KYC/CKYC – check if KYC/CKYC already done – upload fresh KYC/CKYC in case of changes in client details
- If KYC not done, please upload details on CKYC/KRA website.
- Upload UCC to MCX
- Communicate to the client about the UCC allotted.
- Send a copy of the executed client registration form to the client.
- Map UCC to dealer on Trader Terminal.
- On receipt of margin funds, the UCC shall be activated, the exposure limits will be.
- The client registration form – hard copy and soft copy shall be preserved for a minimum period of 10 years.
- Further KYC done at future date shall appended to the client file.
- Any changes in client details viz., address, e-mail, phone numbers, contact details, etc are to be updated only on receipt of a duly signed communication letter of the change by the client. Such changes will



be incorporated in the back office system and KYC updated immediately.

Further, we shall follow the below policies:

- We do not entertain walk-in clients.
- The client registration form (including KYC, proofs and all the correspondences and other related documents) – hard copy and soft copy shall be preserved for a minimum period of 10 years.
- We preserve the hard copy of the client registration documents in our office folders. We also preserve the soft copies – scanned copies on our back office computer systems – with back up on the server.
- All the risks associated with trading is clearly communicated to the client at the time of registration. The Risk Disclosure Documents, as prescribed by the Exchange, is also specifically communicated to the client.
- A full set of copy of the executed client registration documents is sent to the client in hard or soft copy as per their preference.
- Any change in client details viz. address, email-id, contact details, etc shall be updated/ changed in office records and exchange UCC records, on receipt of written authorization from client.
- We shall collect documents relating to financials of the client annually.
- We have maker-checker internal control with respect to client handling. While one staff is involved with the initial client registration process – filling up documents, collection of proofs, etc. – another staff will be required to do the verification of the documents and the details provided by the client will be confirmed with the client on telephone.
- Systems and processes of client registration:



- After receipt of the client registration document and verification of the same, UCC will be allotted to the client.
- The client details and UCC shall be entered in the back office system.
- KYC shall be uploaded.
- UCC file exported from the back office system shall be uploaded to the Exchange.
- Check whether KYC and UCC upload successful.
- We do not outsource client registration processes.
- Client account with no transactions for a period of 1 year shall be classified as Inactive. Before allowing any new transactions in such inactive accounts, fresh KYC documents will be collected from client, CKYC and UCC shall be updated for any changes. We shall scrutinize the client as per PMLA requirements. We shall also ascertain if that particular client is only trading or are there any beneficial owners behind.

In the future, we will further amend our policies as per the guidelines laid down by MCX and FMC/SEBI in this regard.