

Introduction – Jambuwala Commodities Private Limited is full-service broking houses, which are a Trading Member of Bombay Stock Exchange Limited (BSE), National Stock Exchange of India Limited (NSE), Multi Commodity Exchange Limited (MCX) and National Commodity & Derivatives Exchange Limited (NCDEX) Bearing SEBI Registration No. INZ000056036 and a Depository Participant with CDSL SEBI Reg. IN – DP – 527 – 2020.

CLIENT DUE DILIGENCE / KYC

Introduction

Jambuwala Commodities Private Limited has formulated a Customer Due Diligence/ Know Your Customer policy, referred here as “CDD/ KYC policy”, based on the criteria/ guidelines specified in the Securities & Exchange Board of India.

This policy defines different types of customers, their minimum required information & documents along with the characteristics of High-Risk Customers. It further explains how to ensure the identity of the clients, who initiates relationship with Jambuwala Commodities Private Limited and how to maintain and update the CDD/KYC measures for existing customers.

The Sales Team / Relationship Managers / Associates are required to ensure that the customer’s information (including Joint Account holders) shall be submitted to the Account Opening Department by duly submitting a KYC Form.

Scope

The scope of CDD/ KYC policy is to establish reasonable measures to know about the customers of RCSPL Share Broking Pvt. Ltd., whether individual / Non individual or institutional, in accordance with the stated guidelines by the board.

The scope of the policy is concerned with the staff and the associates of Jambuwala Commodities Private Limited For this purpose, training with respect to CDD/ KYC to the concerned staff and associates shall be carried out on regular basis.

Principles of CDD/ KYC

Jambuwala Commodities Private Limited has structured few principles for the effective implementation of KYC policy. These principles shall be applicable to all the existing and new customers, details of which are as follows;

- Payment in cash or bearer instruments shall be strictly prohibited;
- Third party cheques shall be strictly prohibited;
- Any account which has zero balance for a period of more than Three months and have no trading activity for three months will be considered as “Dormant Account” and only after necessary CDD/ KYC verifications, the Customer is allowed to trade with RCSPL Share Broking Pvt. Ltd.;
- Government account shall not be opened in the personal names of the Government Official(s);
- Dealing with any Political Exposed Person or customers holding public or high-profile position, relationship with them should be established and/ or maintained with the approval of Senior Management of Jambuwala Commodities Private Limited including if any existing customer becomes holder of any public office or high-profile position;

- For customers that are legal persons or for legal arrangements, Jambuwala Commodities Private Limited is required to take reasonable measures to understand (i) the ownership and control structure of the company (ii) determine that who own or control the company. This includes those persons who exercise ultimate effective control over a company;
- **In case Jambuwala Commodities Private Limited is not able to satisfactorily complete the required DD/ KYC measures, account should not be opened, business relationship should not be established and business transaction should not be carried out.** Instead reporting of suspicious transaction is considered. Similarly, relationship with existing customer should be terminated and reporting of suspicious transactions be considered if CDD/ KYC is found unsatisfactory;

Verification

Verification is an integral part of CDD/ KYC measures for which Jambuwala Commodities Private Limited is required to ensure the following areas;

- Verify PAN Details with original as well on Income Tax/NSDL website;
- Verify ID Proof against original;
- In-Person Verification;
- Telephonic confirmation/validation;

Record Updation & Retention

CDD/ KYC should not be contemplated as a onetime exercise at the time entering into relationship with the customers. It should be viewed as an ongoing process and should encompass the followings;

Jambuwala Commodities Private Limited shall carry out regular training for staff / RM / Associates on the Updation of clients' information and records; and maintain proper records of customer identifications and clearly indicate in writing any exception in fulfilling CDD/ KYC measures.

Furthermore, Jambuwala Commodities Private Limited shall keep records regarding the identification data obtain through the customer due diligence process (e.g. copies or records of official identification documents like passports, identity cards, driving licenses or similar documents) account files and business correspondence for at least 5 (five) years after the business relationship is ended.

Policy Reviewed and Authorised by

Mr. Kamal Shah
Director