Corum Securities Pvt. Ltd

Client Onboarding Policy

REVIEWD by Director

➢ Objective & Scope:

This policy delineates the end-to-end client onboarding journey, ensuring comprehensive **know-your-client (KYC)**, **client due diligence (CDD)**, and **ongoing surveillance**, in accordance with provisions issued by SEBI and relevant commodities exchanges. The aim is to cultivate fair, transparent, and compliant client relationships.

➢ Client Onboarding Procedures

1 KYC s Client Due Diligence (CDD)-

- **Mandatory Verification**: Authenticate client identity and beneficial ownership upfront; require consistent documentation and verifiable records, with no minimum exemption thresholds.
- **Enhanced Scrutiny** : Apply heightened due diligence for non-resident clients, trusts, NGOs, high net-worth individuals, PEPs, and other high-risk categories.
- **Risk-Based Framework**: Classify clients as low, medium, or high risk based on business nature, geography, turnover, and payment modes; reuse existing SEBI risk-rating principles.
- **Ongoing Monitoring**: Conduct periodic reviews and refresh KYC data, especially when risk profiles shift or suspicions arise.
- **Third-Party Reliance**: Allowed under SEBI/PMLA norms only if the third-party is regulated and fully compliant; ultimate accountability rests with Ganga Nagar Commodity Limited.

2 Timelines s Investor Communication

- **Onboarding Deadline**: Finalize onboarding within one week of account initiation, as stipulated in the SEBI Investor Charter.
- **KYC Submission**: Upload client KYC data into KRA and CKYCR within three working days.
- **UCC Allocation**: Assign Unique Client Code before enabling commodity trading access.
- **Investor Charter Disclosure**: Provide newly onboarded clients with the Investor Charter (via website, email, account kit).

Surveillance, Compliance & Contingency Planning

- **Surveillance Policies**: Board-approved policy frameworks to monitor trading patterns, detect anomalies, and report suspicious activity, aligned with exchange requirements.
- **Corrective Action Oversight**: In light of new directives, any non-compliance detected during inspections must be remediated; failure to cure within 45 days will result in sanctions, including suspension of client onboarding and trading services.

Record Management & Retention

- **Retention Period**: Store all client KYC, beneficial ownership, account correspondence, and trading records for a minimum of five years post-termination of the client relationship, consistent with PMLA and SEBI norms.
- **Accessibility s Audit Trail**: Maintain records in a retrievable format to support regulatory audits and investigations. Ensure appropriate internal mechanisms for prompt retrieval.

Policy Governance & Review

- **Board Approval**: The policy shall be ratified by Board-level governance and reviewed annually or as necessitated by regulatory updates.
- **Stakeholder Training**: Mandatory training programs for frontline staff and compliance officers to operationalize the policy and remain abreast of evolving requirements.
- **Audit s Compliance Reporting**: Regular internal audits to validate policy adherence; prompt reporting of material deviations to SEBI or relevant exchanges as required.

CORUM SECURITIES PVT. LTD.

JOGuJL

Authorised Signatory/Director