MUNI BROKING HOUSE LIMITED
Corporate Office: The Legacy, Unit 41A/43, 25A Shakespeare Sarani, Kolkata - 700017
CIN - U66120WB2023PLC260758 GSTIN - 19AAQCM6975R1Z0

BENEFICAL OWNERSHIP POLICY

Last Reviewed on	Reviewed By	Approved By
05-03-2026	Compliance Officer	Management

BENEFICAL OWNERSHIP POLICY

Muni Broking House Limited, hereinafter referred to as Muni, is the SEBI registered Stock Broker & Depository Participant.

OBJECTIVE

The objective of the policy as per the SEBI circular No. CIR/MIRSD/2/2013 dated 24.01.2013 has been defined as the natural Person or persons who ultimately own, control or influence a client and/or person on whose behalf a transaction is being conducted, and includes a person who exercise ultimate effective control over a legal person or arrangement. The Company has adopted the following checks/procedures to determine the beneficial ownership:

The first step to be followed in all the cases is to collect all the KYC documents as outlined by SEBI for ascertaining and analysing the financial position, integrity and social standing of the stakeholders. The details so collected are checked with the available data's provided by the regulator and the statutory bodies.

In case of Corporates:

- The shareholding pattern is closely examined and if the Dominant Promoter Group is placing orders and interacting with the company the beneficial owner(s) can be easily determined.
- In case the above is not the case the DPG is contacted and questioned about beneficial owner(s) of the account and an explanation is asked for.
- If the controlling ownership is more than 25% of share or capital or profit of the juridical person where the juridical person is a company, then the above procedures will be followed to identify the ultimate controlling interest of the beneficial owners.

In case of Partnership Firm:

- The partnership deed is closely examined to determine the beneficial ownership for placing orders and interacting with the company so that the beneficial owner(s) can be easily determined.
- In case the above is not the case the partner(s) are contacted and questioned about beneficial owner(s) of the account and an explanation is asked for.

- If the controlling ownership is more than 15% of Capital or Profits of the juridical person where the juridical person is a partnership, then the above procedures will be followed to identify the ultimate controlling interest of the beneficial owners.

In case of Trust

- In order to identify the beneficial owner(s) the trust deed is closely examined to determine the purpose of the trust, the trustees, ultimate beneficiaries and any other natural person exercising ultimate control over the trust and of the protector and the settler of the trust, whenever there are beneficiaries with 15% or more interest in the trust or through a chain of control or ownership.

In case of AOP'S and BOI's:

- All the necessary statutory papers should be collected from AOP and BOI to identify the ultimate beneficiary owner/natural person where ever more than15% of the controlling ownership interest of the property or capital or profits of the juridical person where held.

In case of NRI'S:

- For determining the beneficial ownership of a NRI client, the KYC documents outlined by SEBI is collected as per the circular no CIR/MIR/SD/11/2013 dated September 5th 2012.

In case where there exists doubt as to the above with respect to person having controlling ownership interest as beneficial owners or where no natural person exerts control through ownership interest then the identity of that natural person exercising control over the juridical could be identified through other means as outlined in the circular.

Exemption in case of listed companies:

Where the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

Applicability for foreign investors:

Intermediaries dealing with foreign investors viz, Foreign Institution all 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.

IMPLEMENTATION

We record the information provided by the clients in the back-office software.

Approval Authority and Review policy:

This policy is approved by the Board of Muni Broking House Limited.

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs.

Policy communication:

A copy of this policy shall be made available to all the relevant staff/persons such as: compliance officer / department in-charge. Further, a copy of this policy has to be displayed on our website.