

Vishwas Fincap Services Pvt. Ltd.

Guidelines on Identification of Beneficial Ownership

In line with SEBI Circular No. CIR/MIRSD/2/2013 dated January 24, 2013, Vishwas Fincap Services Pvt. Ltd. is committed to obtaining sufficient information from clients to identify and verify the identity of persons who beneficially own or control accounts. The following guidelines outline our procedures for client due diligence:

I. For Clients Other Than Individuals or Trusts

For clients that are not individuals or trusts, such as companies, partnerships, or unincorporated associations/bodies of individuals, Vishwas Fincap Services Pvt. Ltd. shall:

1. Identify the Beneficial Owners:

- Determine the natural person who, whether acting alone or together, or through one or more juridical persons, exercises control through ownership or who ultimately has a controlling ownership interest.

Explanation: Controlling ownership interest means ownership of/entitlement to:

- **For companies:** More than 25% of shares or capital or profits.
- **For partnerships:** More than 15% of the capital or profits.
- **For unincorporated associations or bodies of individuals:** More than 15% of the property or capital or profits.

2. Control through Other Means:

- In cases where there is doubt as to whether the person with the controlling ownership interest is the beneficial owner, or where no natural person exerts control through ownership interests, identify the natural person exercising control through other means.

Explanation: Control through other means can be exercised through voting rights, agreements, arrangements, or in any other manner.

3. Senior Managing Official:

- Where no natural person is identified as per the above points, identify the relevant natural person who holds the position of senior managing official.

II. For Clients Which Are Trusts

For clients that are trusts, Vishwas Fincap Services Pvt. Ltd. shall:

1. Identify the Beneficial Owners:

- Determine 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.

III. Exemption in Case of Listed Companies

For clients or owners of controlling interests that are companies listed on a stock exchange, or are majority-owned subsidiaries of such companies, Vishwas Fincap Services Pvt. Ltd. shall:

1. Exemption from Identification:

- It is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.