

# Nangalia Stock Broking Pvt. Ltd.

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508, The Stock Exchange Tower, Dalal Street, Fort, Mumbai - 400 001.

CIN NO. : U67120MH1998PTC116886

☎ : +91-22-22722240/41/42 Email: [admin@nangaliagroup.in](mailto:admin@nangaliagroup.in)

## **CustomerAcceptancePolicy(CAP)**

- A. Nangalia Stock Broking Pvt Ltd is a Boutique Stock Broking Firm and does not welcome walk in customers. The Company opens client accounts for those people or entities who are known to the Directors of the Company.
- B. Established Intuitional Investors Accounts will be opened
- C. Where the investor is a new investor, account must be opened only after ensuring that pre account opening KYC documentation and procedures are conducted.
- Documents as per Stock Exchanges and SEBI standard norms to be collected  
-identity verification of the client to be made through support desk
- D. Any transaction from a client may be accepted only after Customer acceptance procedure is completed. However, Customer acceptance procedure and Transaction acceptance procedure may be initiated simultaneously in case of low risk customers. If Customer acceptance procedure rejects a customer and customer does not respond to requests for additional information, the account opening will be rejected. A suitable condition may be incorporated in the account opening/transaction request form to this effect.
- E. The Clients are introduced in the system through Directors of the Company Only. No Walk In Customers are entertained by the Company.

## **Know your clients standards–identification of customer:**

- A Identity generally means a set of attributes which together uniquely identify a natural or legal person. An individual's identity comprises his/her name recent photograph, signature, date of birth, PAN Card Copy. Aadhar Copy and the residential address at which he/she can be located. In case of non-individuals, identification is established with the help of registration number, copies of incorporation documents, location, address of head office / registered office and identity of authorized signatories.

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B Identification evidence should be verified for:

- The name of the account holder(s)/the person in whose name an investments are registered verified through dmat account statement and bank account statement
- No Power of Attorney is accepted by the Company.

C. Arisk-based approach will be adopted towards certification of documents. For identifying risk profile of the clients, reliance will be placed on a self-certified copy of the documents required to prove identity and address by submitting latest Income Tax Payment Proof. Where the beneficial owner is a well established entity like religious trust/endowment board registered as such with any government authority, educational trust having a standing of not less than 10 years and good reputation in the locality where it is situated, recognized Non- government organization, companies listed on recognized stock exchanges, SEBI registered intermediary, IRDA registered insurance company or insurance intermediary, pension fund registered under appropriate authority, SEBI recognized stock exchange, scheduled commercial bank, government departments, government agencies, statutory bodies, public sector undertakings and such other entities of irrefutable reputation the documentation for establishing identification include certified true copies of Memorandum and Articles of Association and Certificate of Incorporation. However, identification of the authorized signatory shall be on the lines of all risk individual customers.

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## Customer Identification Procedure

**Pre-account Opening:** The submission of all documents required under this policy is a pre-requisite for account opening for all customers. Incomplete application (including incomplete documentation) is to be rejected. NSBPL will follow the industry standard for implementing customer identification procedure. However, proof of identity and address proof will be verified based on documentation provided. In case there is a deviation from the above then the approval of Directors shall be taken and the process shall be completed.

## Indicative list of suspicious activities

- A. **Cash Transactions:** NSBPL does not accept cash for any investment nor does it pay cash towards any redemption or refunds. Therefore, instances of suspicion on the grounds of cash transaction are not expected.
- B. **Pay orders / Demand Drafts incoming payments:** No such instruments will be accepted by Nangalia Stock Broking Pvt Ltd. Only Payment through net banking or cheques will be accepted.
- C. **Third Party incoming payments issued in India:** If the cheque towards investment is issued by a payer other than the account holder or one of the account holders in case of joint account, the following procedure shall be followed:

Discourage accepting third party cheques. However, the third party cheque is towards investment by minor or dependent member of the family viz., wife, son or daughter, father, mother, brother or sister, such third party payments may be accepted if declaration to that effect is made in the application form. Further, obtain a declaration from the customer confirming that the source of funds for the payment is legitimate. If no declaration is given, the transaction will be rejected. Joint Bank Accounts transactions will be accepted.

- D. **Transactions that do not make economic sense and generation of RED Flag by Risk Management team:**
  - o Using multiple client codes for trading for same client
  - o Frequent churning of particular scripts to generate volume in the script

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## **E Attempts to avoid Reporting / Record Keeping requirements:**

- o Investors reluctant to provide information
- o Investor induces the NSBPL not to file any report/forms

## **F Unusual Activities:**

- O Any un usual requests like not-sending of account statements
- o Very large number of bank accounts
- O Sudden surge in activity level,
- o In operative accounts for more than 12 months becoming active suddenly.
- o Frequent change of bank mandates /address i.e.,three or more changes in six months.

## **G Customer who provides insufficient information:**

- o Information/Additional information requested but not forthcoming (with in 30 days or request) in relation to transactions with NSBPL .
- o Frequent "Returned Undelivered" status on communications to investor; 5 or more in a calendar year.

## **H Certain Suspicious Funds Transfer Activities**

- o In ward Wire transfer from overseas—which is not supported by adequate declarations
- o Country of Inward Wire Transfers differing from Country mentioned in bank mandates
- o Bank mandates mentioned in high risk and moderate risk countries All customers, channel partners and distributors are requested to understand NSBPL policy on KYC standards and AML measures and co-operate with NSBPL in implementing these policy.