

## **IN-PERSON VERIFICATION POLICY OF INVESTSMART STOCK BROKERS PVT.LTD. (ISBPL)**

This is an internal policy of Investsmart Stock brokers Pvt.Ltd. for In-person Verification of CLIENTS.

### **ABSTRACTS FROM VARIOUS SEBI CIRCULARS**

SEBI vide letter No. MIRSD/DPS-III/130466/2008 dated July 02, 2008 (addressed to the stock exchanges), mandated the stock brokers to carry out 'in-person' verification of their clients by their staff while registering them and also ensure that this function is not outsourced.

Subsequently, SEBI vide circular No. SEBI/MIRSD/Cir. No. 02/2010 dated January 18, 2010 clarified that the 'in person' verification done for opening beneficial owner's account by a Depository Participant (DP) will hold good for opening trading account by a stock broker and vice versa, if the stock broker and DP is the same entity or if one of them is the holding or subsidiary company of the other.

Subsequently, SEBI vide circular No. CIR/MIRSD/22/2011 dated October 25, 2011, clarified that the subsidiaries of stock exchanges, acting as stock brokers, may rely upon the 'in-person' verification done by their sub-brokers (who are also registered with SEBI as stock brokers of the parent stock exchange) for their respective clients.

However, the ultimate responsibility for 'in-person' verification would remain with the subsidiaries and they shall obtain the necessary IPV documents for their records.

## **POLICIES & PROCEDURES TO BE FOLLOWED**

1. It is compulsory for all Segments in which organisation deals.
2. No **KYC** forms will be entertained by ACCOUNT OPENING TEAM, if the identity of client was not In-Person Verified by an **employee** of the organisation.
3. It is the responsibility of Account Opening Team to check in KYC whether the below mentioned column is duly filled or not
  - Documents verified With Original & has to be self attested by client.
  - Clients Interviewed by
  - In-Person Verification done by

**Duly Filled** means that date of verification, name and signature of the employee who has done in-person verification and the member's stamp incorporated in the client registration form.

The in person verification of client can be done by any staff /employee of the company

Interview has to be by the person above the level of sub staff

The policy will be reviewed as and when required by the regulator/exchange or at the time of review by board.