

WEALTHSTREET FINANCIAL SERVICES PRIVATE LIMITED

CLIENT REGISTRATION & DUE DILIGENCE POLICY

Policy Version	4.0
Effective Date	25.03.2026
Review Frequency	Annually or upon regulatory change
Prepared By	Compliance Department
First Approval	Operations Committee
Final Approval	Internal Committee/ Board of Directors

Wealthstreet Financial Services Private Limited

Formerly Known as Wealthstreet Advisors Private Limited

CIN: U74999GJ2016PTC094432

Regd. Off : A-1101, Mondeal Heights, 11th Floor, Besides Wide Angle, S.G Highway, Ahmedabad-380015

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1. INTRODUCTION & REGULATORY FRAMEWORK

Wealthstreet Financial Services Private Limited (“the Company”) has formulated this Policy in accordance with the guidelines issued by the Securities and Exchange Board of India, Stock Exchanges, and applicable provisions of the Prevention of Money Laundering Act (PMLA) and Anti-Money Laundering (AML) standards.

The objective of this Policy is to establish a robust and controlled framework for client registration, identification, due diligence, and ongoing monitoring. The Policy is designed to ensure that only genuine and verified clients are onboarded, to prevent misuse of the securities market, and to maintain full compliance with all applicable regulatory requirements.

2. CLIENT REGISTRATION & IDENTIFICATION

The Company follows a comprehensive and well-defined client onboarding process wherein no client account is opened unless all prescribed Know Your Client (KYC) requirements are duly completed. The Company ensures that client registration documents are obtained in the prescribed format and are duly filled in, leaving no material fields blank or incomplete. Particular attention is given to critical details such as trading segments opted, email address, and contact details to ensure completeness and accuracy.

Clients are required to submit valid documentary proof including PAN, proof of address, bank account details, and financial information. All documents are verified against originals prior to activation to ensure their authenticity.

In-person verification (IPV) is mandatorily carried out for all clients, either through physical interaction or through permitted digital or video-based mechanisms. The IPV process ensures that the identity of the client is verified using original documents, and appropriate records of such verification are maintained.

The Company may onboard walk-in clients; however, such clients are subject to stringent verification and due diligence procedures. Enhanced controls, including strict IPV, verification of original documents, and additional scrutiny based on risk perception, are applied to mitigate associated risks.

As part of the onboarding process, the Company conducts screening of all clients against regulatory and sanction databases, including SEBI debarred entities, UNSC sanctions lists, Politically Exposed Persons (PEP) databases, and OFAC lists. Clients identified as restricted or high-risk are either not onboarded or are subjected to enhanced due diligence procedures in accordance with regulatory requirements.

Unique Client Code (UCC) is generated only after successful completion of all verification processes. The UCC is uploaded to the Exchange systems within prescribed timelines, ensuring accuracy, uniqueness, and proper linkage with the client’s PAN and other details.

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3. CLIENT DUE DILIGENCE, RISK PROFILING & FINANCIAL ASSESSMENT

The Company adopts a risk-based approach for client due diligence. Financial capability of clients is assessed based on appropriate documentary evidence such as Income Tax Returns, salary slips, bank statements, net worth certificates, or client declarations, as applicable. The client's trading experience, investment objectives, and risk appetite are also considered as part of the assessment process.

Based on the evaluation, clients are categorized into risk levels such as Low, Medium, High, and Clients of Special Category (CSC). High-risk clients, including Politically Exposed Persons, Non-Resident Indians, trusts, corporates with complex ownership structures, and clients with inconsistent or unverifiable financial profiles, are subjected to enhanced due diligence measures. Such measures include obtaining additional documentation, senior-level approvals, and continuous monitoring of transactions.

Client risk categorization is reviewed periodically and updated based on transactional behavior, changes in financial profile, and other relevant risk indicators.

4. SYSTEMS FOR UCC CREATION AND UPLOAD

The Company has established robust systems and controls for the generation and upload of Unique Client Codes. UCC is generated only after completion of all KYC and verification requirements. The system ensures that duplicate client codes are not created and that all relevant client details are accurately captured.

UCC data is uploaded to the Exchanges within the timelines prescribed by regulatory authorities. The Company maintains complete audit trails for all such uploads and ensures that any modification in client details is appropriately updated and reported.

5. RECORD KEEPING, STORAGE AND RETRIEVAL

The Company maintains all client registration documents and related records in a secure manner, either in physical or electronic form. All documents are duly verified, properly recorded, and stored in an organized manner to facilitate easy retrieval.

A centralized record management system is maintained to ensure that client documents can be accessed promptly for internal audits, regulatory inspections, or any other official requirements. All records are preserved in accordance with the timelines prescribed under applicable SEBI and PMLA regulations.

6. INTERNAL CONTROLS AND MAKER-CHECKER MECHANISM

To ensure accuracy and prevent misuse, the Company has implemented a maker-checker mechanism in the client onboarding and data updation processes. The maker is responsible for capturing client information, while the checker independently verifies the completeness, accuracy, and validity of the data.

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The checker ensures that all mandatory fields are duly filled, no blank spaces are left in critical sections, and all supporting documents are properly verified. Client accounts are activated only after successful completion of this verification process.

7. UPDATION OF CLIENT DETAILS

The Company ensures that client information, including financial details, address, email ID, and contact information, is kept up to date. Such details are updated either periodically or upon receipt of a valid request from the client supported by appropriate documentary evidence.

All updates are subject to verification and are recorded in the system with proper audit trails. Updated details are also reflected in regulatory reporting systems wherever applicable.

8. PROCESS FOR SHARING CLIENT REGISTRATION DOCUMENTS

The Company ensures that duly executed client registration documents are shared with clients in a timely manner. Such documents may be provided electronically through the client's registered email ID or physically, if required.

The Company maintains appropriate records or acknowledgements to evidence that the client has received the executed documentation and is aware of the terms and conditions governing the account.

9. OUTSOURCING OF CLIENT REGISTRATION ACTIVITIES

The Company generally undertakes client registration and KYC processes in-house and does not outsource critical activities. In cases where any ancillary services are availed, the same are carried out strictly in accordance with regulatory guidelines and under adequate supervision and control to ensure confidentiality, data protection, and process integrity.

10. CLIENT AWARENESS AND RISK DISCLOSURE

The Company ensures that clients are adequately informed about the risks associated with trading and investing in securities. Prior to activation of the account, clients are provided with all relevant documents, including the Risk Disclosure Document, Rights and Obligations, and other regulatory communications.

The Company strictly refrains from making any assurance or guarantee of returns and ensures that all communications with clients are fair, transparent, and compliant with regulatory requirements.

11. MARKETING PRACTICES AND CLIENT ACQUISITION

Client acquisition is carried out through authorized and compliant channels. The Company may have a designated marketing or business development function; however, all such activities are governed by strict internal guidelines and regulatory requirements.

The Company does not engage in misleading advertisements, false commitments, or non-compliant promotional schemes. No assurance of returns is provided under any circumstances.

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The Company does not offer any prohibited incentives or freebies that may mislead clients. Any permissible offerings, such as promotional benefits or free account opening, if provided, are done transparently and strictly in compliance with applicable regulations.

12. CLIENT BASE MANAGEMENT

The Company maintains complete and updated records of all active clients. The number of active clients is monitored on an ongoing basis and reported to regulatory authorities as required.

13. POLICY REVIEW AND GOVERNANCE

This Policy shall be reviewed periodically, at least on an annual basis, or as and when required due to any changes in applicable laws, regulations, or business operations. Any modifications or amendments to this Policy shall be subject to approval by the Board of Directors or any duly authorized committee thereof.

This Policy shall be read in conjunction with the Company's Code of Conduct, internal policies, and applicable regulatory guidelines, including those prescribed by the Securities and Exchange Board of India and Stock Exchanges.

14. CONCLUSION

The Company has established a comprehensive and SEBI-compliant framework for client registration, due diligence, risk assessment, and monitoring. The systems and processes implemented ensure adherence to regulatory requirements, enhance transparency, and safeguard the integrity of the securities market.

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