



CENTILLION CAPITAL PRIVATE LIMITED

(Formerly PELF FINSTOCK LTD)

(MEMBER : NSE, BSE, DP: NSDL)

SEBI Regn. No. INZ000168834, DPID: IN 302943

CIN: U65993DL1995PTC073247

Policy for Internal Control

1. Client Due Diligence :

We apply the usual client due diligence measures prescribed under KYC norms. Additionally, we also take reference of a client or person known to us in respect of walk-in clients. The format in which we conduct the client due diligence is part of our KYC form.

2. Assessment of financial capability of client :

We take assessment of financial capability of the clients based on the following documents

- (a) Copy of ITR acknowledgement.
- (b) Copy of Annual Returns.
- (c) Copy of Form No. 16: In case of salary income.
- (d) Net worth certificate from a Chartered Accountant.
- (e) Salary slip duly stamped, signed by employer.
- (f) Bank Account Statement for last six months.
- (g) Copy of Demat Account holding statement.
- (h) Any other document substantiating ownership of assets.

3. Process of record keeping and retrieval of client registration documents:

All client registration documents, once checked, found complete and verified as such and the accounts opened, are stored in safe vaults in a sequential manner. Additionally, all KYCs and supporting documents are scanned and kept in soft form. We can retrieve either the physical or the scanned records on an easy basis.

4. Updation of client financial and other client particulars

In respect of clients trading in derivative segment, we have a policy to collect any of the following documentary evidence for financial information of clients.

- a) Copy of ITR Acknowledgement
- b) Copy of Annual Accounts



- c) Copy of Form 16 in case of salary income
- d) Net worth certificate
- e) Salary Slip
- f) Bank account statement for last 6 months
- g) Copy of demat account Holding statement.
- h) Any other relevant documents substantiating ownership of assets
- i) Self declaration along with relevant supporting.

5. Systems and Process adopted for UCC upload:

From our back-end, we generate file for the client containing data of market segment, client code, client name, PAN, address in the format prescribed by Exchange. The data generated are thereafter verified with KYC. On the data being found fully correct, the client is uploaded on UCC - site of Exchange. After uploading, we run a check, on the UCC-site, by entering the specific client, whether or not the client details are actually uploaded on UCC-site.

6. Process of client code closure:

First the client has to give a request for closure in the prescribed format accompanied with a photocopy of PAN card with signature. On receipt of such request, the account is checked for any outstanding balance either debit or credit. If it is a debit balance, the client is asked to clear it. In case of a credit balance, the same is paid to the client.

Policy last reviewed on March 31, 2025.

