BMD Securities Limited

POLICY ON SAME MOBILE NUMBER AND/OR EMAIL ADDRESS CAPTURED FOR MULTIPLE CLIENTS

Policy created by	Compliance Organization
Policy reviewed by	Principal Officer
Policy reviewed on	
Policy Approved by	Board of Directors
Policy approved on	28-04-2025

Version – 1.1

1. Objective:

This policy aims to ensure that our organization comply with regulatory guidelines on capturing distinct mobile numbers and email addresses for each client, except under specific circumstances, to enhance client identification and ensure KYC (Know Your Customer) compliance.

2. Regulatory Compliance:

Our organization must adhere to the guidelines set forth by SEBI and Depositories as follows:

✓ **Separate Mobile Number and Email:**

- Our organization must ensure that each client (both new and existing) has a distinct mobile number and email address in the records.
- Under exceptional circumstances, our organization may, at the specific written request of the client, upload the same mobile number or email for more than one client, provided the clients are from the same 'Family' (as defined by Depositories: self, spouse, dependent children, and dependent parents).

✓ **Reporting Requirements:**

- Reports identifying instances of duplicate mobile numbers and email addresses across client accounts must be reviewed periodically.
- Our organization must review the monthly reports provided on the Depository System for duplicate email addresses and mobile across client accounts.

✓ **Action on Identified Non-Compliant Accounts:**

- If the mobile number/email address belongs to a family, a written request from the client must be obtained, and the family flag updated accordingly.
- If the duplication does not fall under the family exception, our organization must inform clients to provide updated mobile numbers or email addresses. If clients fail to comply, the account will be deemed KYC non-compliant and may face restrictions.

✓ **Notice and Suspension of Non-Compliant Accounts:**

- Our organization must issue a 15-days' notice to non-compliant clients to update the family flag or provide updated contact information.
- In the absence of a response, our organization must suspend such accounts for debit transactions.

3. Key Measures to Minimize Duplicates:

✓ **Client Communication:**

- Proactively engage clients to ensure recent contact details are updated in the system or family declarations are received from clients for same email address and mobile used in family accounts.
- Maintain verifiable records of attempts to contact clients for audits.

✓ **Internal Checks:**

- Ensure that the mobile numbers and email addresses of DP employees, including Key Managerial Personnel (KMPs), are not used for any client accounts.

✓ **Compliance Reporting:**

- Monthly compliance reports must be submitted to Depository. Non-compliant accounts and actions taken must be clearly recorded and submitted for review.

4. Exceptions:

- ✓ Participants are allowed to upload the same mobile number or email for more than one client only if the clients belong to the same family. For such cases, DPs must ensure:
  - A written request is obtained from the client.
  - The family flag is updated in the system to indicate the relationship between the clients.

5. Penalty for Non-Compliance:

- ✓ Non-compliance may result in audit penalties or corrective actions as mandated by SEBI and Depositories.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff/Employees/and Directors of the Company.

For M/s. BMD Securities Limited ,

BMD SECURITIES LTD.

Director/Authorised Signatory

Director