

INSTRUCTIONS ON CONTROLLING PERSONS / ULTIMATE BENEFICIAL OWNER

As per SEBI Master Circular No. CIR/ISD/AML/3/2010 dated December 31, 2010 regarding Client Due Diligence policy, related circulars on anti-money laundering and SEBI circular No. CIR/MIRSD/2/2013 dated January 24, 2013, non-individuals and trusts are required to provide details of controlling persons [CP] / ultimate beneficiary owner [UBO] and submit appropriate proof of identity of such CPs / UBOs. The beneficial owner has been defined in the circular as the natural person or persons, who ultimately own, control or influence a client and /or persons on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a legal person or arrangement.

1. For Investors other than individuals or trusts:

- (i) The identity of the natural person, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest. Controlling ownership interest means ownership of/entitlement to:-
 - more than 25% of shares or capital or profits of the juridical person, where the juridical person is a company;
 - more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership;
 - more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.
- (ii) In cases where there exists doubt under clause (i) above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity of the natural person exercising control over the juridical person through other means like through voting rights, agreement, arrangements or in any other manner.

(iii) Where no natural person is identified under clauses (i) or (ii) above, the identity of the relevant natural person who holds the position of senior managing official

2. For Investors which is a trust:

The identity of the settler of the trust, the trustee, the protector, the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.

3. Exemption in case of listed companies / foreign investors:

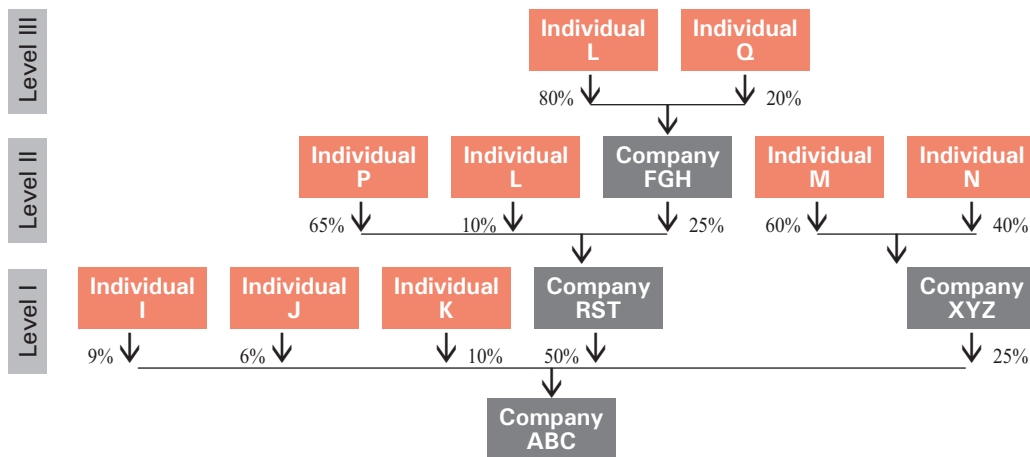
The client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies. Intermediaries dealing with foreign investors' viz., Foreign Institutional Investors, Sub Accounts and Qualified Foreign Investors, may be guided by the clarifications issued vide SEBI circular CIR/MIRSD/11/2012 dated September 5, 2012, for the purpose of identification of beneficial ownership of the client

4. Document Type: Please mention the Code or Document as per table below

Code	Description
A	Passport
B	Election ID Card
C	PAN Card
D	ID Card
E	Driving License
G	UIDIA / Aadhar letter
H	NREGA Job Card
Z	Others

ILLUSTRATION FOR ESTABLISHING BENEFICIAL OWNERSHIP

To assist with this process, an example can be found below on how to determine BOs of a company. Here is the ownership structure of Company ABC:



Here is the corresponding calculation of beneficial ownership:

Calculation of ownership

Individual	Company	Level I	Level II	Level III	Effective ownership
Individual I		9%			9%
Individual J		6%			6%
Individual K		10%			10%
Individual M	Company XYZ	25%	60%		15%
Individual N	Company XYZ	25%	40%		10%
Individual L	Company RST	50%	10%		5%
	Company FGH	50%	25%	80%	10%
Individual P	Company RST	50%	65%		32.50%
Individual Q	Company FGH	50%	25%	20%	2.50%
Total =					100%

In the above example, KYC documents & shareholding pattern of Company RST & XYZ required. Additionally KYC documents of Individual P shall be required who holds 32.50% in ABC.