

OHM SECURITIES

Guidelines on Identification of Beneficial Ownership

The "Beneficial Owner" is the natural person or persons who ultimately own, control or influence a client and / or persons on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person or arrangement.

Explanation on who is a Beneficial Owner as per SEBI & Exchanges Guidelines:

➤ Where the client is an Unlisted company/ Firm/ Unincorporated Association /Body of Individuals:

- A. 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:

- I. ownership of /entitlement to more than 25 percent of shares or capital or profits of the juridical person, where the juridical person is a company;
 - II. ownership of /entitlement to more than 15 percent of capital or profits of the juridical person, where the juridical person is a partnership; or,
 - III. Ownership of/ entitlement to more than 15% of the property or capital or profits of the juridical person where the juridical person is an in incorporated association or body of Individuals.
- B. Where no natural person is identified under I & II above, the beneficial owner is the relevant natural person who holds the position of the senior managing official.
- C. Where client or owner of the controlling interest is a company listed on a stock exchange, or is a subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

Where the client is a 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.

For Ohm Securities



Proprietor

