

Standard Operating Procedure (SOP)

Elite Wealth Limited

Subject: Compliance with SEBI Circular No. **SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/111** dated **31-Jul-2025**, NSDL & CDSL Master/Operating Circulars (as on Mar-31-2025) and subsequent circulars.

Version: 1.0

Date: 30-Sept-2025

1. Purpose

To set out clear, auditable procedures that ensure Elite Wealth Limited (EWL) complies with SEBI Circular SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/111 (Digital Accessibility / Rights of Persons with Disabilities compliance), NSDL Master Circular for Participants, CDSL DP Operating Instructions and all subsequent related circulars and directions. This SOP harmonises account opening, demat operations, digital accessibility, customer grievance redressal, recordkeeping, reporting and internal controls.

2. Scope

Applies to all EWL business units, employees, agents, outsourced vendors and technology platforms involved in: client onboarding, KYC/CDD, demat account servicing, pledge & transfer processing, digital interfaces (web, mobile, IVR), grievance handling, compliance reporting and IT/security operations.

3. Definitions

- **RE** – Regulated Entity (EWL as a registered stock-broker/DP participant/registered intermediary).
- **DP** – Depository Participant.
- **Digital Accessibility** – Accessibility of digital platforms in accordance with Rights of Persons with Disabilities Act, 2016 and SEBI's Compliance Guidelines circular dated 31-Jul-2025.

4. Responsibilities

- **Board / Senior Management:** overall accountability for regulatory compliance and resource allocation.
- **Compliance Officer:** day-to-day oversight, implementation, reporting to SEBI/Depositories, and keeping SOPs current.
- **Operations Head (DP Services):** ensure adherence to NSDL/CDSL operating instructions for demat/settlement functions.
- **IT / Digital Team:** implement & monitor accessibility features, maintain logs, patch management and CSCRf alignment.

- **Customer Service / Grievance Officer:** manage grievance lifecycle within timeframes in depository / SEBI circulars.
- **Outsourced Vendors:** contractually bound to meet same standards; vendor management to include audit & escalation clauses.

5. Key Procedures

5.1 Regulatory Monitoring & Update Mechanism

- Compliance to maintain a regulatory tracker (SEBI, NSDL, CDSL) with publication date, effective date, summary, and required actions. Review weekly; escalate material updates to the Board within 5 business days of identification.

• 5.2 Digital Accessibility Compliance (per SEBI 31-Jul-2025 circular)

- Audit all digital touchpoints (website, mobile apps, client portals, online forms, PDFs, videos, IVR) for WCAG-concordant accessibility features (keyboard navigation, screen reader compatibility, alt texts, transcripts, accessible forms). Maintain an Accessibility Conformance Report and remediation roadmap.
- Publish an accessibility statement on public website indicating compliance status, contact for accessibility requests, and timelines for remediation.
- Conduct quarterly accessibility testing (manual + automated) and annual third-party accessibility audit; remediate critical issues within timelines mandated by SEBI. Document results and file with Compliance.

5.3 Account Opening & KYC / CDD

- Follow mandatory documents and processes as per NSDL/CDSL Master Circulars—minimum KYC, verification for minors, AoPs, corporate accounts, and record retention. Use depository templates where provided. Maintain e-KYC and physical KYC linkage per depository instructions.

• 5.4 Demat Operations (Transmission, Pledge, Settlement)

- Process demat debit/credit/pledge/unpledge and DDPI instructions strictly per NSDL/CDSL operating instructions and circulars; use standardized input validations and two-factor authorization for DPs/authorized signatories. Maintain audit trail for each instruction
- For unpaid securities, client payout and auto-pledge processes will follow CUSPA/Depository guidance and any SEBI clarifications. Implement system checks to prevent unauthorized debits. (Reference internal CUSPA policy aligned to SEBI/Depository circulars.)

5.5 Grievance Redressal & Reporting

- Acknowledge investor complaints within timelines specified by depositories/SEBI; maintain a grievance register and monthly MIS to Management. Escalate unresolved

complaints to depositories/SEBI per prescribed escalation matrix. **5.6**

Cybersecurity & Incident Response

- Align to SEBI's Cybersecurity and Cyber Resilience Framework (CSCRF) and related depository guidance. Maintain incident response plan, quarterly tabletop exercises, and timely reporting to Regulators/DCP (as required).

5.7 Recordkeeping & Retention

- Retain client records, transaction logs, accessibility test reports, grievance logs and compliance evidence for periods specified by SEBI/Depositories (and as per Master Circular chapters on record retention). Provide records during inspections/audits.

5.8 Internal Controls, Audit & Training

- Perform periodic internal audits (operational, IT, accessibility compliance). Compliance to prepare quarterly compliance certificates for Board review. Provide mandatory annual training for front-office, operations, IT and vendor teams on accessibility, demat operations, AML and cybersecurity.

6. Reporting & Escalation

- Material breaches, accessibility failures affecting users, cyber incidents, or depository reconciliation mismatches to be reported to: (i) CEO, (ii) Compliance Officer, (iii) Board Audit/Compliance Committee within 24 hours (initial notification) and followed by a detailed report within 72 hours as applicable. Submit required regulatory filings to SEBI/NSDL/CDSL as per the specific circular timelines.

7. Vendor & Outsourcing Controls

- All vendor contracts to include regulatory compliance clauses, right to audit, data security and accessibility obligations. Compliance to maintain a vendor register with periodic assessment results.

8. Review & Amendment

- This SOP will be reviewed at least annually and upon issuance of any material SEBI/NSDL/CDSL circular.

Reviewed on 30.09.2025