

## Handling of Family/Group Accounts Policy

### 1. Objective

The objective of this policy is to define the framework for identification, monitoring, and management of **Family/Group client accounts** to prevent misuse of limits, concentration of exposure, and regulatory non-compliance. This policy ensures fair practices, compliance with SEBI/Exchange requirements, and transparency in client dealings.

### 2. Scope

This policy applies to all client accounts that are linked through:

- Same PAN (in case of HUF/Family arrangements).
- Common address, contact details, or bank accounts.
- Relationships identified by UCC mapping (family members, related entities, group companies).
- Any other linkage identified through internal surveillance or regulatory instructions.

### 3. Identification of Family/Group Accounts

- Clients declaring family/group association during account opening will be flagged in the back-office/UCC records.
- Periodic data analysis (using PAN, mobile number, email ID, bank account, and DP ID) shall be performed to identify unreported family/group accounts.
- Any newly identified group linkage shall be updated in internal systems.

### 4. Risk Management Guidelines

- **Independent Limits:** Each client account must operate with its own approved margin and exposure limits. Sharing of limits across family/group accounts is strictly prohibited.
- **Monitoring of Trades:** Surveillance systems must review trades of related accounts to detect:
  - Circular/reversal trades.
  - Concentrated positions in single security.
  - Possible misuse of exposure through cross-margining.
- **Alerts & Escalation:** Unusual activity in group/family accounts shall be flagged and escalated to the Compliance Officer.

Corporate Member : N S E / B S E / M S E I / MCX  
(Capital Market / F&O / Currency and Commodity Segment / Commodity Exchange)

#### Regd. / Correspondence / Corporate Office :

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**5. Operational Procedures**

- Back-office systems will maintain a **Family/Group Code** for mapping related accounts.
- Risk and surveillance teams will generate periodic reports on group exposure, turnover concentration, and margin utilization.
- Any suspicious trades among family/group accounts shall be reported to the Exchange/SEBI, if required.

**6. Roles & Responsibilities**

- **Operations Team:** Maintain proper tagging of family/group accounts in UCC and back-office records.
- **Risk Management Team:** Monitor exposure, generate group risk reports, and implement alerts.
- **Compliance Officer:** Ensure regulatory adherence, periodic review, and reporting to authorities.

**7. Regulatory Reporting & Compliance**

- The policy complies with SEBI circulars and Exchange surveillance guidelines on **Group/Family accounts**.
- Records of identified family/group accounts and monitoring reports shall be preserved for at least **5 years**.

**8. Review of Policy**

- The policy shall be reviewed at least annually or earlier if mandated by SEBI/Exchange.
- Updates shall be approved by the Board/Designated Partners.

**Place: Ahmedabad**

**Updated Date: 01-09-2025**

FOR AMRAPALI CAPITAL AND FINANCE SERVICES LIMITED



Designation of the Issuing Authority:

(Compliance Officer / Director / Proprietor / Partner / HR Manager)

**Name: Nilesh Kapuriya**

Corporate Member : N S E / B S E / M S E I / MCX  
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