



**Policy on
Accessibility, Inclusion and On boarding
of
Persons with Disabilities**

(Version 1.0 updated on 01.01.2026)

1. Introduction and Purpose

GEPL Capital Private Limited (“GEPL”) is committed to promoting financial inclusion and ensuring equal access to capital market services for all individuals, including Persons with Disabilities (PwDs).

GEPL believes that every individual, irrespective of physical, sensory, intellectual, or mental ability, has the right to manage their investments independently, confidently, and with dignity. The Company endeavours to make its account opening, onboarding, and service delivery processes accessible and inclusive, with appropriate assistance and flexibility to accommodate the specific needs of persons with disabilities.

GEPL provides comprehensive support throughout the account opening process, including assistance in complying with Know Your Client (KYC) requirements. Flexible options such as physical signatures, on-screen/electronic signatures, thumb impressions, and personalised customer support are made available based on individual requirements. The objective of this Policy is to ensure a smooth, transparent, and inclusive onboarding and service experience for all clients.

By facilitating independent access to trading and demat accounts for persons with disabilities, GEPL reaffirms its commitment to inclusive participation in the securities market and compliance with the Rights of Persons with Disabilities Act, 2016 and applicable regulatory directions issued by SEBI.

2. Scope

This Policy applies to:

- All Persons with Disabilities as defined under the Rights of Persons with Disabilities Act, 2016;
- All services offered by GEPL including demat accounts, trading accounts, KYC processes, digital platforms, and customer support;
- All employees, officers, authorised persons, and service providers of GEPL involved in client onboarding and servicing.

3. Objective & Commitment

GEPL Capital Private Limited (“GEPL”) is committed to:

- Ensuring **equal, effective, independent and dignified access** to all services and digital platforms offered by the Company for Persons with Disabilities (PwDs);
- Enabling PwDs to open and operate **demat & trading accounts**, complete KYC, and avail digital services without barriers; and
- Complying with the **Rights of Persons with Disabilities Act, 2016** and rules made thereunder, as well as all applicable SEBI circulars and regulatory guidelines that mandate accessibility and inclusion.

4. Legal & Regulatory Framework

This policy aligns with:

1. **Rights of Persons with Disabilities Act, 2016 (RPwD Act, 2016)** – ensuring accessibility, non-discrimination, and equal access to services for PwDs.
2. **SEBI Circular – Rights of Persons with Disabilities Act, 2016 and rules made thereunder – mandatory compliance by all Regulated Entities** (SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/111) – requiring digital accessibility of all digital platforms and inclusive onboarding processes.
3. **SEBI Circular on Accessibility and Inclusiveness of Digital KYC to Persons with Disabilities** (SEBI/HO/MIRSD/SECFATF/P/CIR/2025/74) – mandating intermediaries to extend inclusive digital KYC support.

5. Accessibility & Digital Platforms

GEPL shall ensure that:

1. **All digital platforms** (website, mobile app, web portals, video KYC, digital KYC interfaces, etc.) are compliant with accessibility standards and facilitate ease of use for PwDs, including those with visual, auditory, motor, and cognitive disabilities.
2. Digital accessibility audits are conducted, and remediation is carried out as per the timelines prescribed in SEBI guidance. Reporting and audits will be completed and regularly updated in accordance with regulatory timelines. Accessibility features such as screen readers, assistive navigation, alternate text for images, keyboard accessibility, and other WCAG-related provisions (as applicable) are implemented to support PwD users on digital interfaces.
3. GEPL shall maintain a **record of digital platforms** offered to clients and their accessibility compliance status, and submit reports as required to exchanges or regulators.

6. Account Opening & Onboarding

6.1 Independent Account Opening

- PwDs who are **18 years or older**, of sound mind, and legally capable of entering contracts can open demat and trading accounts independently.

6.2 Guardianship & Support

- Where a PwD requires a guardian (as per law), GEPL accepts a valid **Guardianship Certificate** issued by a competent authority under applicable statutes (e.g., Mental Healthcare Act, 2017; National Trust Act).
- Accounts for PwDs who cannot sign may be opened through **guardian signatures or authorised representatives**, with due compliance.

6.3 Documentation & KYC

GEPL shall ensure that:

- KYC forms and account opening documentation comply with SEBI and KYC regulations.
- PwDs may submit **thumb impressions, scanned specimen signatures, or alternate means of signature** where necessary, subject to regulatory acceptance.
- Digital KYC is offered with appropriate assistance and support to ensure PwDs can complete biometric or live verification processes.

7. Inclusive Digital KYC Support

GEPL will:

1. Offer **inclusive digital KYC**, enabling PwDs to complete the process through accessible interfaces.
2. Provide **support on request**, including assisted video capture or alternate means, to complete KYC.
3. Facilitate **use of Central KYC Registry (CKYCR) data** with client consent to minimise duplication.

8. Communication & Support Services

GEPL shall:

- Maintain a **dedicated support helpline and email** for PwDs requiring assistance during onboarding.
- Train customer support personnel to effectively assist PwDs with accessibility needs.
- Ensure communication materials and instructions related to account opening (digital or physical) are accessible.

9. Monitoring & Compliance

1. GEPL shall regularly monitor compliance with this Policy, the RPwD Act, and relevant SEBI directives.
2. Internal accessibility audits will be conducted periodically.
3. Compliance reports and action taken reports are maintained and shared with stock exchanges/depositories in accordance with regulatory requirements. **Data Privacy & Protection**

GEPL shall ensure that:

- All personal information and disability-related information is collected **only with consent**, used for legitimate purposes, securely stored, and protected per applicable privacy regulations.

10. Grievance Redressal & Escalation

PwDs may raise complaints or accessibility issues via:

- Customer Support Helpline / Dedicated Email
- Escalation to Compliance Officer
- Access to the regulator's investor grievance system (e.g., SEBI SCORES) if needed.

GEPL shall ensure complaints are addressed promptly and sensitively.

11. Review of Policy

This Policy on Accessibility, Inclusion and On boarding of Persons with Disabilities has been approved by the Board of Directors vide dated January 01, 2026.



Process for Persons with Disabilities (PwDs) to Open a Trading & Demat Account

GEPL Capital Private Limited ('GEPL') is committed to promoting financial inclusion and ensuring equal access to capital market services for all individuals, including Persons with Disabilities (PwDs).

We believe that every individual, irrespective of physical, sensory, intellectual, or mental ability, has the right to manage their investments independently, confidently, and with dignity. GEPL endeavours to make its account opening and onboarding processes accessible and inclusive, with appropriate assistance and flexibility to accommodate the specific needs of persons with disabilities.

GEPL provides comprehensive support throughout the account opening process, including assistance in complying with KYC requirements. Flexible options such as physical signatures, on-screen/electronic signatures, thumb impressions, and personalised customer support are made available based on individual requirements. Our objective is to ensure a smooth, transparent, and inclusive onboarding experience for all clients.

By facilitating independent access to trading and demat accounts for persons with disabilities, GEPL reaffirms its commitment to inclusive participation in the securities market.

FAQs on Opening Demat and Trading Accounts for Persons with Disabilities

(As per SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/111)

1. Can individuals with disabilities open demat and trading accounts with GEPL Capital Private Limited?

Yes. GEPL Capital Private Limited allows individuals with disabilities to open both demat and trading accounts, subject to compliance with applicable regulatory requirements.

2. Is a guardian required for individuals with disabilities to open a demat and/or trading account with GEPL?

An individual who has attained the age of 18 years, is of sound mind, and is not legally disqualified from entering into contracts may open an account independently.

Where a guardian is required as per SEBI FAQs, GEPL accepts a valid **Guardianship Certificate** issued by the Local Level Committee under the provisions of:

- The Mental Healthcare Act, 2017, and/or

- The National Trust for the Welfare of Persons with Autism, Cerebral Palsy, Intellectual Disability, and Multiple Disabilities Act, 1999.

Both the person with disability and the guardian must comply with applicable KYC norms.

3. If a person with disability is unable to sign, under whose signature can the account be opened?

In cases where the individual is unable to sign, the account may be opened with the signature of the guardian who is duly authorised by a competent authority.

4. What documentation is required for persons with disabilities to open a demat or trading account with GEPL?

As per SEBI guidelines, **uniform documentation** is applicable for all account openings, including persons with disabilities. This includes:

- Know Your Client (KYC) form,
- Account opening forms and disclosures,
- Disability Certificate issued by a competent medical authority under the Rights of Persons with Disabilities Act, 2016, where applicable.

5. If the individual cannot sign the forms, do both the guardian and the individual need to comply with KYC norms?

Yes. Where the account is opened with a guardian's signature, **both the guardian and the person with disability must comply with all applicable KYC requirements.**

6. Does GEPL offer online / digital KYC for persons with disabilities?

Yes. GEPL offers online/digital KYC facilities. Assistance is provided by GEPL's support team wherever required to ensure ease of completion of the KYC process.

7. Can a thumb impression be used for online/digital KYC at GEPL?

Yes. GEPL accepts thumb impressions. For online KYC, documents bearing wet signatures, e-signatures, or thumb impressions (where permitted) are acceptable, subject to regulatory norms.

8. How can a person with disability initiate the process of opening a demat and trading account with GEPL?

To initiate the account opening process, persons with disabilities may contact GEPL's customer support team by:

- Writing to support@geplcapital.com or
- Contacting the designated customer support helpline.

The GEPL team will provide personalised assistance and guide the client through each step of the onboarding process.

9. How does GEPL address difficulties faced during onboarding, particularly for on-screen signatures?

GEPL provides multiple alternatives to address challenges related to on-screen signatures, including:

- Upload of a scanned image of the specimen signature for e-sign purposes,
- Physical signing of documents and submission to GEPL,
- Acceptance of thumb impression as an alternative, where applicable.

10. Is there a provision to rely on KYC information from the Central KYC Registry (CKYCR)?

Yes. GEPL may rely on KYC information downloaded from the **Central KYC Registry**, subject to the consent of the person with disability.

11. Can GEPL capture disability type and percentage during the KYC process?

Yes. GEPL may capture details relating to the type and percentage of disability during the digital KYC process, strictly in accordance with regulatory requirements and with the consent of the client.

Disability Status Declaration

1. Please select one:

- ☐ Not a Person with Disability (PwD)
- ☐ **Person with Disability (PwD) – Please specify:**
- | | |
|---|--|
| <input type="checkbox"/> Blindness / Low Vision | <input type="checkbox"/> Deaf / Hard of Hearing |
| <input type="checkbox"/> Speech & Language Disability (Dumb / Mute) | <input type="checkbox"/> Locomotor Disability |
| <input type="checkbox"/> Mobility Impairment | <input type="checkbox"/> Intellectual Disability |
| <input type="checkbox"/> Mental Illness | <input type="checkbox"/> Multiple Disabilities |
| <input type="checkbox"/> Acid Attack Survivor (with permanent facial/eye disfigurement) | |
| <input type="checkbox"/> Other (Please specify): _____ | |

2. Accessibility Provisions Required (if any):

- ☐ Not Required
- ☐ Required
- | | |
|---|--|
| <input type="checkbox"/> Braille / Large Print Statements | <input type="checkbox"/> Physical Assistance at Branch |
| <input type="checkbox"/> Sign Language Assistance / Video Interaction | <input type="checkbox"/> Other (please specify): _____ |

3. Guardian Details (To be filled only if applicable)

Do you require a Guardian / Legal Representative to operate your account?

- ☐ Yes (Please provide details below) ☐ No

Guardian's Details (as per Guardian Certificate issued under RPwD Act, 2016 / Court Order):

- Full Name: _____
- Relationship with Client: _____
- Guardian Certificate No.: _____ Issuing Authority: _____
- Validity Period (if any): _____

Guardian's KYC Details (mandatory if guardian is appointed):

- PAN: _____
- Aadhaar / Other Govt. : _____
- Address: _____
- Contact No.: _____
- Email ID: _____

Supporting Documents to be attached:

1. Certified copy of Guardian Certificate / Court Order
2. Guardian's KYC documents (PAN, Aadhaar, Address Proof)
3. Photograph of Guardian

Declaration by Client and Guardian

I/We hereby declare that:

1. I, _____ (Name of Client), confirm that I am registering as a client with GEPL Capital Private Limited ("GEPL") and the information furnished in this form is true, complete and correct to the best of my knowledge and belief.
2. I understand that, due to my disability status as disclosed above, I have appointed _____ (Name of Guardian) as my lawful Guardian/Legal Representative, in accordance with the Guardian Certificate / Court Order issued under the *Rights of Persons with Disabilities Act, 2016* and applicable laws.
3. The Guardian hereby undertakes to operate and manage the account **solely in the best interest of the Client**, and not for any personal gain, misuse, or unauthorized purpose.
4. The Guardian agrees that all actions, instructions, transactions and dealings carried out in this account will be binding on the Client, and such actions shall be deemed to have been carried out with the consent of the Client.
5. Both the Client and Guardian agree to promptly notify GEPL in case of any change in disability status, guardian details, or revocation/expiry of the Guardian Certificate.
6. I/We confirm that GEPL shall not be held liable for any dispute arising between the Client and Guardian, and that the appointment of Guardian is strictly in compliance with applicable laws and valid supporting documents.

(Client Signature/Thumb Impression)

(Guardian Signature/Thumb Impression)