



Star Finvest Private Limited

MEMBER : National Stock Exchange of India Ltd, Bombay Stock Exchange Ltd, MCX, Depository Participant-NSDL
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STAR FINVEST PRIVATE LIMITED POLICY ON OUTSOURCING

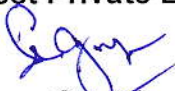
Guidelines on Outsourcing of Activities:

Though our organization – “Star Finvest Private Limited” is at present, not outsourcing any major intermediary activity, none the less we have formulated the policy keeping in mind the future needs of the organization within the guidelines set by SEBI and Exchanges.

Hence, in case of any outsourcing activity by our organization then we would keep in mind the following points while appointing a third party to overlook the functioning of the desired activity:

1. We will ensure high standards of service and exercise due diligence and ensure proper care in their operations.
2. We would outsource with a view to reduce cost substantially or for strategic reasons.
3. We would bear in mind that outsourcing activity through a third party may pose the following risks: operational risk, reputational risk, legal risk, country risk, strategic risk, exit-strategy risk, counter party risk, concentration and systemic risk. Such risks need to be mitigated to maximum possible extent.
4. We will follow the principles for outsourcing as laid down by SEBI in their Annexure I.
5. However the following activities shall not be outsourced- core business activities and compliance functions. A few examples of core business activities may be – execution of orders and monitoring of trading activities of clients in case of stock brokers; dematerialization of securities in case of depository participants; investment related activities in case of Mutual Funds and Portfolio Managers. Regarding Know Your Client (KYC) requirements, we shall comply with the provisions of SEBI {KYC (Know Your Client) Registration Agency} Regulations, 2011 and Guidelines issued there under from time to time.

For Star Finvest Private Limited


(Surender Kumar Gupta)
Director
Date:01-04-2022

