



Bhogilal Trikamlal Securities Pvt. Ltd.

MEMBER: BSE LTD. & NSE LTD.

R-717/721, Rotunda Bldg., B. S. Marg, Fort, Mumbai - 400 023. || Tel.: 2272 1907 • Fax: 2272 2966
GST No.: 27AABC5497N1Z2 || SEBI Regd. No.: INZ000218139 || CDSL Regd. No.: IN-DP-216-2016

Digital Accessibility Policy

1. Purpose

We Bhogilal Trikamlal Securities Private Limited ("BTSPL"), a Depository Participant of Central Depository Services (India) Limited (CDSL), are committed to ensuring digital accessibility for all investors, including persons with disabilities. This policy is framed in line with the Securities and Exchange Board of India (SEBI) Digital Accessibility Circulars and applicable regulatory requirements, with the objective of providing inclusive, equitable, and barrier-free access to all investor-facing digital platforms.

2. Regulatory Framework

This policy is formulated in accordance with: - SEBI Circulars on Digital Accessibility issued from time to time - Rights of Persons with Disabilities Act, 2016 - Web Content Accessibility Guidelines (WCAG) 2.1 / latest version at Level AA - Applicable guidelines issued by CDSL and SEBI

3. Scope

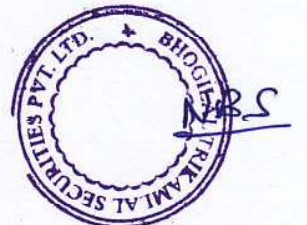
This policy applies to all investor-facing digital platforms of BTSPL, including but not limited to: - Official website(s) - Investor portals - Web-based applications - Mobile applications (if any) - Digital communication interfaces used for investor services

4. Accessibility Commitment

BTSPL is committed to: - Providing digital platforms that are perceivable, operable, understandable, and robust - Ensuring minimum accessibility compliance at WCAG Level AA - Continuously improving accessibility features based on audits, feedback, and regulatory updates - Addressing accessibility-related grievances in a timely and effective manner

5. Accessibility Standards

BTSPL shall ensure that its digital platforms: - Support screen readers and assistive technologies - Provide adequate color contrast and resizable text - Include keyboard navigability - Provide alternative text for non-text content - Avoid content that may cause seizures or physical discomfort - Ensure clear structure, labels, and instructions





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6. Accessibility Audits

- BTSPL shall conduct periodic accessibility audits of its digital platforms through certified accessibility professionals.
- Audit findings shall be documented and remediation shall be undertaken within defined timelines.
- Audit frequency shall be at least once every year or as mandated by SEBI/CDSL.

7. Roles and Responsibilities

Board of Directors / Senior Management

- Provide oversight and ensure adequate resources for implementation of this policy.

Compliance Officer

- Ensure regulatory compliance with SEBI and CDSL accessibility requirements.
- Coordinate submission of accessibility compliance status to Depositories/SEBI.

IT / Technology Team

- Implement and maintain accessibility features in digital platforms.
- Address audit observations and accessibility complaints.

Investor Services Team

- Facilitate assistance to investors facing accessibility challenges.
- Coordinate resolution of accessibility-related grievances.

8. Investor Grievance Redressal

- Investors may lodge accessibility-related complaints through SCORES under the category "Accessibility".
- BTSPL shall promptly acknowledge, investigate, and remediate accessibility-related issues for closure of complaints.
- Accessibility complaints shall be tracked and reviewed periodically.

9. Reporting and Disclosure

- BTSPL shall submit status of readiness and compliance with digital accessibility requirements to the specified reporting authority within prescribed timelines.
- Digital accessibility commitments may be disclosed on the Company's website and included in the Investor Charter, as applicable.





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10. Training and Awareness

- Relevant employees shall be provided periodic training and awareness on digital accessibility and inclusive design principles.
- Accessibility considerations shall be incorporated into system development and vendor selection processes.

11. Review and Amendment

This policy shall be reviewed annually or earlier, if required, due to changes in regulatory requirements, technology, or business operations. Any amendments shall be approved by the competent authority of the Company.

12. Effective Date

This Digital Accessibility Policy shall come into force with effect from the date of approval by the Board of Directors / Authorized Committee of Bhogilal Trikamlal Securities Private Limited.

Policy Prepared By: **Nirav B. Shah (Compliance Officer)**

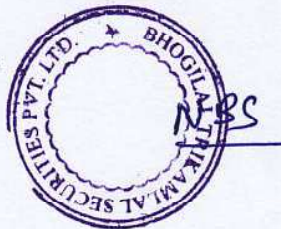
Approved By: **Board of Directors**

Date: **19th.March 2026.**

For and on behalf of Bhogilal Trikamlal Securities Pvt. Ltd.

Nirav Bharat Shah

Nirav Bharat Shah
(Director)





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R-717/721, Rotunda Bldg., B. S. Marg, Mumbai - 400 023. Tel.: 2272 1907 / 1936 / 1967 / 2331 / 2966 • E-mail: investors@btsec.co.in

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF THE BOARD OF DIRECTORS OF M/S BHOGILAL TRIKAMLAL SECURITIES PRIVATE LIMITED HELD ON 19TH MARCH, 2026 AT THE REGISTERED OFFICE OF THE COMPANY AT 717/721, ROTUNDA BLDG., M. S. MARG, FORT, MUMBAI.

"RESOLVED THAT pursuant to the applicable provisions of the Companies Act, 2013 and rules made thereunder, and in compliance with the guidelines and circulars issued by the Securities and Exchange Board of India (SEBI), Central Depository Services (India) Limited (CDSL), and other applicable regulatory authorities, the Digital Accessibility Policy of the Company, as placed before the Board, be and is hereby approved and adopted.

RESOLVED FURTHER THAT the Company shall ensure implementation of the said policy across all its investor-facing digital platforms, including website(s), investor portals, and communication interfaces, in order to provide accessible, inclusive, and barrier-free services to all investors, including persons with disabilities.

RESOLVED FURTHER THAT any Director of the Company be and is hereby authorized to sign, execute and file necessary documents, forms, returns, and to do all such acts, deeds, and things as may be necessary to give effect to this resolution."

CERTIFIED TRUE COPY

For Bhogilal Trikamlal Securities Private Limited

Mr. Bharat B. Shah

Mrs. Malti B. Shah

Mr. Nirav B. Shah

Bharat B Shah

Malti Bharat Shah

Nirav Shah

Director

Director

Director

