

PMLA Policy

1. Objective:

The objective of these measures is to discourage and identify any money laundering or terrorist financing activities. These measures are intended to place a system for identifying, monitoring and reporting suspected money laundering or terrorist financing transactions to the law enforcement authorities.

2. Appointment of Principle Officer:

The company shall appoint a Principle Officer, as required under the Prevention of Money Laundering Act, 2002. The Principle Officer is responsible to discharge the legal obligations to report suspicious transactions to the authorities. The Principle officer will act as a central reference point in facilitating onward reporting of suspicious transactions and assessment of potentially suspicious transactions.

3. Transactions to Record:

- All cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency.
- All series of cash transactions integrally connected to each other which have been valued below rupees ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month.
- All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place.
- All suspicious transactions whether or not made in cash and including, inter-alia, credits or debits into from any non monetary account such as demat accounts.

Note: For recording all the suspicious transactions not only “transactions integrally connected”, “transactions remotely connected or related” should also be considered in records.

4. Information's to be recorded:

- The nature of the transactions.
- The amount of the transaction and the currency in which it was denominated.
- The date on which the transaction was conducted.
- The parties to the transaction.
- The origin of the transaction.

5. Retention of Records:

- All necessary records on transactions, both domestic and international, should be maintained at least for the minimum period of 10 years as prescribed in PMLA, 2002 and other legislations, regulations or exchange bye-laws or circulars.
- In situation where the records relate to on-going investigations or transactions which have been the subject of a suspicious transaction reporting, they should be retained until it is confirmed that case has been closed.

6. Procedure and manner of maintaining information.

- The company shall maintain information in respect of above transactions with its client in hard and soft copies and in accordance with the procedure and manner as may be specified by the Reserve Bank of India or the Securities and Exchange Board of India, as the case may be, from time to time.
- The company shall maintain such information in form specified above and at such intervals as may be specified by the Reserve Bank of India, or the Securities and Exchange Board of India, as the case may be, from time to time.

- The company to observe the procedure and the manner of maintaining information as specified by the Reserve Bank of India or the Securities and Exchange Board of India, as the case may be.

7. Client Acceptance & Identification Policy:

The company has very strong system in place for acceptance of new client. The main measures which company has implemented for acceptance of new client keeping in view the PMLA requirements are as follows:

- The Application forms for opening an account are issued only when the prospective client provides the valid reference & introducer for his account.
- All accounts are opened only when the prospective client is present in person before the company official.
- The company collects the details of location (permanent address, correspondence address and registered office address), occupation details, nature of business activities, financial details etc. before new clients is registered.
- The company shall collect the various mandatory documents as required by law, including the proof of identity of the client.
- The company periodically reviews the trading volumes of the clients and their financial strength in terms of annual income, net worth etc.
- The company also monitors the financial transactions with clients for payin payout of funds and securities.
- The company has the policy not to deal in cash with any of the clients, all transactions, receipt or payment, are carried out only through account payee cheque and demand drafts only.
- The company transacts only in Indian Rupees and no other currencies are being used for trades with clients.
- All funds are released to the client by account payee cheques and with details of the bank account of the client written on the cheque so as to restrict the client to deposit cheques in only those bank accounts for which details are provided to us.

8. Reporting of Transactions:

- The company shall immediately notify to the money laundering control officers or any other designated officer within the intermediary that may be appointed by the authorities. The transactions will be informed immediately in the format as may be prescribed by the Financial Intelligence Unit (FIU) from time to time. The proper documents and supportings will be maintained and forwarded to the regulators as may be asked for.