Admin. Office Add: 24-26, Grnd. Flr, Cama Bldg, Dalal Street, Fort, Mumbai 400001 Reg. Office Add: PG-15, Rotunda Bldg, Dalal Street, Fort, Mumbai 400001 Telefax: 022 – 2264 1364 / 2264 1365

NCDEX ID: 00427 FMC Reg. No.: NCDEX/TCM/PROP/0374 | MCX ID: 35835 FMC Reg. No.: MCX/TCM/PROP/0428

# Guidelines for Anti Money Laundering And Know Your Customer (KYC) Norms

1. Appointment of Principal Officer:

Members have to designate a senior management officer as Principal Officer. The Principal Officer shall be located at the head/corporate office and shall be responsible for monitoring and reporting of all transactions and sharing of information as required under the law. The Principal Officer will maintain close liaison with enforcement agencies, banks and any other institution which are involved in the fight against money laundering and combating financing of terrorism. The name, designation and addresses (including e-mail addresses) of the 'Principal Officer' may be intimated to the Office of the Director-FIU, 6th Floor, Hotel Samrat, Chanakyapuri, New Delhi - 110021, on an immediate basis, with a copy to the Asst. Vice President, Compliance Department, NCDEX.

- 2. FMC's basic objective is that Members have adequate controls and procedures in place so that they know the customers with whom they are dealing. Adequate due diligence on new and existing customers is a key part of these controls. The Customer Due Diligence would include the following aspects:
  - a. Customer acceptance policy
  - b. Customer identification
  - c. Monitoring of transactions
  - d. Tracking and reporting suspicious transactions

#### a. Customer Acceptance Policy

2.1 Members should develop clear customer acceptance policies and procedures, including a description of the types of customers that are likely to pose a higher than normal risk to them. In preparing such policies factors such as customers' background, origin, public position, related accounts, business activities or other risk indicators should be considered. The members should develop graduated customer acceptance policies and procedures that require more extensive due diligence for higher risk customers. For example, the policies may require the fundamental account-opening requirements for a working individual with a small CDM transaction. It is, however, important that the customer acceptance policy is not so restrictive that it results in a denial of access to the market participants, especially the targeted beneficiaries like farmers. On the other hand, quite extensive due diligence would be essential for an individual with a high net worth whose source of funds is unclear. Decisions to enter into business relationships with high risk customers, such as politically exposed persons, should be taken exclusively at senior management level.

#### b. Customer Identification

2.2 Customer identification is an essential element of KYC standards. A customer would include the person or entity that maintains an account with the Member or those on whose behalf an account is maintained (i.e., beneficial owners). Members should undertake the following processes for proper identification of customers:

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- i) Identifying the customer and verifying that customer's identity using reliable, independent source documents;
- ii) Identifying the beneficial owner, and taking reasonable measures to verify the identity of the beneficial owner such that the Member is satisfied that it knows who the beneficial owner is:
- iii) In case of high value of transactions, obtaining information on the purpose and intended nature of the business relationship;
- iv) Conducting ongoing due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the Member's knowledge of the customer, their business profile and risk profile, including, where necessary, the source of funds.

Indicative list of documents that may be obtained from the customers is enclosed at Annexure I.

- 2.3 It is felt that in some specific cases, more rigorous identification procedures should be put in place. The following list is indicative, and the Member can have advanced process for the customer which it feels has high risk profile. Such high risk customers would include the following, but may not be restricted to depending on other customers having high risks associated to them:
  - Companies having close family shareholdings or beneficial ownership
  - Non-face-to-face clients
  - Non resident clients
  - High networth clients,
  - Trusts, Charities, NGOs and organizations receiving donations
  - Politically exposed persons (PEP) of foreign origin
  - Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect, where there is unusual banking secrecy, countries active in narcotics production, countries which are perceived to be sponsors of international terrorism, offshore financial centers, tax havens, countries where fraud is highly prevalent)
  - Clients with dubious reputation as per public information available.
- 2.4 The above mentioned list is only illustrative and the Members should exercise independent judgment to ascertain whether new clients should be classified for more rigorous identification.

# c. Monitoring of Transactions

- 2.5 The Member should put in place a mechanism to monitor the transactions being conducted through it, for ensuring effectiveness of the Anti Money Laundering procedures. For this, the Member should keep a tab on the transaction profile of the clients. This would help them in identifying the abnormal trade profile of the suspected clients.
- 2.6 The Member should pay attention to all complex, unusually large transactions / patterns which appear to have no financial or commercial justification. Very high account turnover, inconsistent with the size of the balance, may indicate that funds are being "routed/ washed" through the account. Examples of suspicious activities can be very helpful to the Member and should be included as part of a jurisdiction's anti-money

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laundering procedures and/or guidance. The Member may also implement internal reporting mechanism and have threshold limits for each class of customers and pay special attention to the transaction which exceeds these limits.

2.7 The Member should ensure that a record of transactions is preserved and maintained for a period of ten years and that any transaction of suspicious nature is reported to the appropriate regulatory / other authority.

# d. Tracking and Reporting Suspicious Transactions

- 2.8 It is emphasized that considering the sensitivity of the issue, the suspicious transaction reporting should be taken up with utmost care and seriousness. Members should ensure to take appropriate steps to enable suspicious transactions be recorded. They should have appropriate internal procedures for reporting of suspicious transactions. Indicative list of circumstances/ profile of the customer is indicated below to serve as a guidance to the Members for recognizing them:
- i) Clients whose verification is complex and not confirmed from other sources
- ii) Substantial increases in turnover without any reason;
- iii) large cash deposits made with the Members;
- 2.9 The suspicious transaction should be immediately notified to the Principal Officer or any other designated officer of the Member. The compliance cell of the Member should randomly examine a selection of transaction undertaken by clients to comment on their nature, i.e., whether they are suspicious transactions.

#### 3. Reporting of Transaction to Financial Intelligence Unit-India

- 3.1 In terms of the PMLA rules, Intermediaries are required to report information relating to cash and suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND)
- 3.2. Cash Transaction Reports: The Prevention of Money-laundering Act, 2002, and rule thereunder require every banking company, financial institution and intermediary, to furnish to FIU-IND information relating to
  - 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;

The cash transaction report (CTR) (wherever applicable) for each month should be submitted to FIU-IND by 15<sup>th</sup> of the succeeding month as per the enclosed format at Appendix I

(In this connection, Members are also requested to refer to our Circular No. NCDEX/COMPLIANCE/005/2009/271 dated October 09, 2009 on the subject of dealings in cash)

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- **ii. Suspicious Transaction Reports:** Every banking company, financial institution and intermediary shall furnish to FIU-IND information of all suspicious transactions whether or not made in cash. **Suspicious transaction** means a transaction whether or not made in cash which, to a person acting in good faith -
  - gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
  - appears to be made in circumstances of unusual or unjustified complexity; or
  - appears to have no economic rationale or bonafide purpose; or
  - gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

The Suspicious Transaction Report (STR) should be submitted within 7 days of riving at a conclusion that any transaction, whether cash or non-cash, or a series of transactions integrally connected are of suspicious nature as per enclosed Appendix II.

The Principal Officer should record his reasons for treating any transaction or a series of transactions as suspicious. It should be ensured that there is no undue delay in arriving at such a conclusion.

Members should carefully go through all the reporting requirements and formats given in the website of Financial Intelligence Unit, India - <a href="http://fiuindia.gov.in/">http://fiuindia.gov.in/</a>

The related hardware and technical requirement for preparing reports in manual/electronic format, the related data files and data structures thereof are also given in the website. Members, which are not in a position to immediately file electronic reports, may file manual reports to FIU-IND as per the formats prescribed.

The Principal Officer will be responsible for timely submission of CTR and STR to FIU-IND. Utmost confidentiality should be maintained in filing of CTR and STR to FIU-IND. The reports may be transmitted by speed/registered post/fax at the notified address.

The Principal Officer and other designated staff may visit the website of FIU - http://fiuindia.gov.in/for detailed guidelines and updates regarding the PMLA, 2002 and notifications issued from time to time.

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#### Annexure – I: Customer Identification system

# List of documents that should be obtained from clients are as follows:

#### a) For Individuals:

### **Proof of Identity**

- Copy of Valid PAN Card / Declaration in lieu of PAN Card as required by FMC Copy of any one of the below mentioned documents should be provided as proof of identity by clients not holding PAN.
- Passport
- Voter ID
- Driving License

Clients who have provided the copy of valid PAN the above mentioned documents are optional.

#### **Proof of Address** (Copy of any one of the below mentioned documents)

- Bank Details
- Depository Details
- Ration Card
- Telephone Bill
- Electricity Bill

#### b) Accounts of HUF

#### **Proof of Identity**

 Copy of Valid PAN Card of HUF / Declaration in lieu of PAN Card as required by FMC

Copy of any one of the below mentioned documents should be provided as proof of identity of Karta by HUF not holding PAN

- Passport
- Voter ID
- Driving License

#### **Proof of Address** (Copy of any one of the below mentioned documents)

- Bank Details
- Depository Details
- Telephone Bill
- Electricity Bill

# c) Accounts of Co-operative Societies/Limited Companies/Pvt. Ltd. Companies

### **Proof of Identity**

- Copy of Valid PAN Card / Declaration in lieu of PAN Card as required by FMC
- Registration Details are mandatory

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# **Proof of Address** (Copy of any one of the below mentioned documents)

- Bank Details
- Depository Details
- Telephone Bill
- Electricity Bill

(Please also refer to "Annexure E: Model Client Registration Form" of the regulations of the Exchange)

#### d) Accounts of Partnership Firms

# **Proof of Identity**

- Copy of Valid PAN Card / Declaration in lieu of PAN Card as required by FMC
- Registration Details (wherever applicable)

**Proof of Address** (Copy of any one of the below mentioned documents of the partners)

- Bank Details
- Depository Details
- Telephone Bill
- Electricity Bill

(Please also refer to "Annexure E: Model Client Registration Form" of the regulations of the Exchange)

### e) Others

(Presently this category would be applicable for Eligible Trusts – other than Charitable Trusts)

#### **Proof of Identity**

Copy of Valid PAN Card / Declaration in lieu of PAN Card as required by FMC

Copy of any one of the below mentioned documents should be provided as proof of identity of the trustees not holding PAN

- Passport
- Voter ID
- Driving License

Clients who have provided the copy of valid PAN the above mentioned documents re optional.

**Proof of Address** (Copy of any one of the below mentioned documents, of the trust)

- Bank Details
- Depository Details
- Telephone Bill
- Electricity Bill

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# PART 7: DETAILS OF SUSPICIOPUS TRANSACTION

Examples of suspicious transaction Reason

Identity of Client	False identification documents
,	Identification documents which could not be verified within
	reasonable time
	Non-face to face client
	Doubt over the real beneficiary of the account
	Accounts opened with names very close to other established business entities
Suspicious Background	Suspicious background or links with known criminals
Multiple accounts	Large number of accounts having a common account holder, introducer or authorised signatory with no rationale.
	Unexplained transfers between multiple accounts with no rationale
Activity in Accounts	Unusual activity compared to past transactions
7 touvity in 7 toooding	Use of different accounts by client alternatively
	Sudden activity in dormant accounts
	Activity inconsistent with what would be expected from
	declared business
	Accounts used for circular trading
Nature of Transactions	Unusual or unjustified complexity
	No economic rationale or bonafied purpose
	Source of funds are doubtful
	Appears to be case of insider trading
	Investment proceeds transferred to a third party
	Transactions reflect likely market manipulations
	Suspicious off market transaction
Value of	Value just under reporting threshold amount in an apparent
Transactions	attempt to avoid reporting
	Large sums being transferred from overseas for making
	payments
	Inconsistent with the client apparent financial standing
	Inconsistency in the payment pattern by client
	Block deal which is not at market price or prices appear to
	be artificially inflated / deflated.

CASH TRANSACTION REPORT (CTR) FOR AN INTERMEDIARY

Kindly fill in CAPITAL Letters. Read the instructions before filling the form.

1.2 Is this a replacement to a	n earlier report? NO YES.
1.3 Date of sending original p	report if this is a replacement report DD MM YYYY
PART 2 DETAILS OF REI	PORTING MEMBER
2.1 Name of intermediary	
2.2 FMC registration number	2.3 ID allotted by FIU-IND
4 Address (No., Building)	
.5 Street/Road	
6 Locality	
.7 City/Town District	
8 State, Country	
9 Pm Code	2.10 Tel (with STD Code)
!! Fax	2.12 E-mail

Account number	
2 Type of account	Trading secount B Demat account
Z_00	thers (Specify)
3 Type of account holder	Individual R Legal person/entity
c	Central / State Government
D	Central/State Government owned undertaking
- 75	
_	D · MM · YYYY
RT 4 LIST OF ACCOUNT	HOLDERS
4 Date of account opening D ART 4 LIST OF ACCOUNT a	HOLDERS
RT 4 LIST OF ACCOUNT	HOLDERS

	Mention A	for todividuals, B fo	× Logal Person/	Equity
rtails of all account ho	idens should be fur	nished in prescribor	(annexure)	
mber of additional she				
CASH TI	RANSACTION R	EPORT (CTR) FO	R AN INTER	MEDIARY
lly fill in CAPITA Le	tters. Read the inst	ructions before fillin	og the form.	
RT 5 LIST OF OTE	ER RELATED I	PERSONS (other th	an account hold	ers)
se of individual/Legal	Person/Equity	Client code/No.	Relation	Annexage
			H	
				出
				措語
			1000	出出
				開田田
Mention B for Aut	h. Signatory, C for	Director/Partner/M	District Dis	開開田
Mention B for Aut E for Guaranter, Z	-4-20/2000/244	Director/Partner/M		

Date of Trunsaction	Debit/Credit	Amount in Rupees	Remarks
DD- MM ~ YY	D for Debit & C for Credit	(	
r of additional sheets	for PART 6 attac	rhed	

7.1	Total debits in the account in the financial year  Total credits in the financial year	]
00 NO	OT FILL FOR FIU-IND USE ONLY Signature	
CK.NO	O Name	7
ATE	Designation	J
D NOT	FELT FRU-IND USE ONLY. CIN	2

#### CASH TRANSACTION REPORT (CTR) FOR AN INTERMEDIARY INSTRUCTIONS

#### GENERAL INSTRUCTIONS

The Prevention of Money Laundering Act 2002 Under the Prevention of Money Laundering Act 2002, every resemediary shall famish details of

- (A) All cash transaction of the value of more than report are taken or its equivalent in foreign correccy;
- (B) All agries of cash transactions integrally Connected to each other which have been valued below rapees ion lakes or its equivalent to foreign currency where such series of transactions have taken place within a morally

Provided that where the principal offices of an immendiary has reason to believe that a single Transaction or scrim of transactions setegrally Connected to each other have been valued below the Prescribed time so so to defeat the provisions of this Section, such officer shall furnish information in respect Of such transactions to the Director within the prescribed

#### How to submit

Every breach bunchise must submit this form to the Director, FRL-IND only through the principal officer Of the intermediary.

#### EXPLANATION OF SPECIFIC TERMS

PART 1 : DETAILS OF REPORT Replacement report is a report submitted in Replacement of an cartior CTR, When a Replacement import is submitted, date of Submitting original CTR may be teentioned and The complete CTR has to be automitted again.

PART 2: DETAILS OF REPORTING MEMBER Particulars of the roember in which the reported Account is maintained should be subgaited into the Post

2.3 ID allorant hy FIU-IND resy to left blank sitt the Same is communicated by FIU-IND.

PART J: DETAILS OF ACCOUNT A reparate CTR is required to be filled for each reported account.

PART 4: LIST OF ACCOUNT HOLDERS Client code/number is the number allotted by by the intermediary to identify the client. Eaclose a separate annexure for each account

PART S: LIST OF OTHER RELATED PERSONS The Client code number may be mentioned if the related person is also a client of the intermediary. The school person can be of following types:

- "It" Authorised signatory
  "C" Director/Particus/Member etc. of a Logal
  Person/Entity
- "D" Introducer
- "E" Guaranter "Z" Other

Linclassed a represent supervise, for each related person.

PART 6: DETAILS OF TRANSACTIONS Debit - Cash withdrawn from the secount. Credit - Cash deposited in the economi.

The amount should be rounded off to nearest Rupeo without decimal.

#### PART 7: CUMULATIVE TOTALS

- 7.1 Total of all debit entries in the accourt from I" April of the financial year self the last day of the month of reporting.
- 7.2 Total of all entries in the account from i April Of the favorial year till the less they of the month of Reporting.
- ALL ANNEXURES MUST BE ENCLOSED.

#### APPENDIX II.

# SUSPICIOUS TRANSACTION REPORT (STR) FOR AN INTERMEDIARY

Kindly fill in CAPITAL Letters. Read the instructions before filing the form.

PART 1 DETAILS OF RE	PORT
1 Date of sending report	DD MM YYYY
2 Is this a replacement to a	n earlier report? NO YES
3 Date of sending original r	eport if this is a replacement report.
	D D M M Y Y Y Y
PART 2 DETAILS OF PR	INCIPAL GERICER
Total Call Wasser 1	The state of the s
.1 Name of member	
.2 FMC registration number	
.3 (D allotted by FIU-IND	2.4 Category of intermediary
.5 til annual by FTC-114D	1 and contegory of macroscomy
5 Name of principal officer	
.6 Designation	
.7 Address (No., Building)	
.8 Stron/Road	
9 Locality	

2.11 State, Country				
2.12 Pin Code	2.13 Tel	(with STD code)		
2.14 Fax		2.15 E-mail		
PART 3 DETAILS OF REPORTS	NG BRANCH OF	MEMBER	-	+
.1 Name of Member.				7
2 Code (if allotted)				-
.3 Address (No., Building)				11
4 Street/Road				
5 Locality				
6 City/Town, District				
7 State, Country				
8 Pin Code		3.9 Tel (with STD Cod	le)	
				11

Name of individual	Code/ID (if allotted) Annexure
	AII
	A 2
	All
	A 4
	A 5
	A 6
	A 7
	T A S
	A 9
	A 16
	A 11
	A 12
	A 13
	[A] 14 ]

PART 5 LIST OF LEG Name of legal p		Code/ID (if available	
i.i.			AII
2			] [42]
3			A 3
4			AA
,	$\equiv$ $_{\Gamma}$		A 5
			A 6
			A 7
			A 8
			H 9
0			B 10

Account Number	Name of First Account Holder	Annexuse
		C 1
		C 2
		C 3
		C 4
		C 5
		C 6
		C 7
		C 8
		C 9
		C 10

AF	RT 7 DETAILS OF SUSPIC	TOUS TRANSA	Thou	
1	Reasons for suspicion (Tickinstructions)  A Identity of a D Activity in Account	k - as applicable		
8	Z. Other reason  Grounds of Suspicion (Meex	-	aspicion and seq	nence of events)

Number e	of additional sheets for part 7 attached.
ART 8	DETAILS OF ACTION TAKEN
ı w	hether the matter is/was under any investigation? (Mention the name of agency, person an
60	ntact details)
	I.
	114.1
unber of	additional shorts for DARY 0
unber of	additional sheets for PART 8 attached
	ILL. FOR FIU-IND USE ONLY
O NOT F	
O NOT F	ILL. FOR FIU-IND USE ONLY
O NOT F	LL. FOR FIU-IND USE ONLY  Signature  Name  (Should be same as the person
O NOT F	ELL. FOR FIU-IND USE ONLY Signature
O NOT F	LL. FOR FIU-IND USE ONLY  Signature  Name  (Should be same as the person
O NOT F	LL. FOR FIU-IND USE ONLY  Signature  Name  (Should be same as the person

PHILIPPID

Financial Intelligence Unit- India.

# SUSPICIOUS TRANSACTION REPORT (STR) FOR AN INTERMEDIARY INSTRUCTIONS

#### General Instructions

The prevention of Money Laundering Act, 2002

Under the prevention of Money Laundering Act, 2002, every intermediary shall furnish details of suspicious transactions whether or not made in each.

Suspecious transaction means a transaction whether or not made in each which, to a person acting in good faith —

- gives rise to a reasonable ground of suspicion that it may involved the proceeds of crime; or
- (b) appears to be made in circumstances of unusual or unjustified complexity: or
- (c) appears to have no contomic rationale or bonufide purpose.

#### How to submit

The principal efficer of the intermediary designated under PMLA, 2002 must submit this form by post to the director (FIU-IND). In argent cases, the form should also be sent by fax.

By Post

Director (FIU-IND),

Pinancial Intelligence Unit-

India,

6<sup>0</sup> Floor, Hotel Samrat, Chanakyapuri, New Delhi –

110021

India.

By Fax

+91-11-26874459

#### EXPANATION OF SPECIFIC TERMS PART 1: DETAILS OF REPORT

 Date of sending report is the date on which the principal officer sends the report to Director (FIU-IND).

1.2 Replacement Report is a report submitted in replacement of an earlier STR. When a replacement report is submitted, date of submitting original STR may be mentioned and the complete STR has to be submitted again.

# PART 2: DETAILS OF PRINCIPAL OFFICER

2.3 ID allotted by FfU-IND may be left bank till the same is communicated by FfU-IND

# PART 3: DETAILS OF MEMBER

Particular of the member in which the reported accounts are maintained should be submitted in this part.

#### PART 4: LIST OF INDIVIDUALS LINKED TO TRANSACTIONS

Client code / number may be given if allotted by the intermediary. Enclose a separate Annexure A for each individual.

#### PART 5: LIST OF LEGAL PERSONS/ENTITIES LINKED TO TRANSACTIONS

Enclosed a separate Annexure B for each legal person/entity. Include the details about individuals (director/partner/ member etc.) related to the reported legal person / entity in part 4.

#### PART 6: LIST OF ACCOUNTS LINKED TO TRANSACTIONS

Enclose a separate Annexure C for each