



**TROO TRIBE TECH LIMITED**  
(Formerly known as Shreeyam Securities Limited)

# **POLICY ON ANTI MONEY LAUNDERING, CLIENT DUE DILIGENCE AND COMBATING FINANCING OF TERRORISM**

## **1. Introduction**

This Policy has been framed to comply with the provisions of the Prevention of Money Laundering Act, 2002, the Prevention of Money Laundering (Maintenance of Records) Rules, 2005, SEBI guidelines on Anti Money Laundering Standards and Combating Financing of Terrorism obligations for securities market intermediaries, and circulars / directions issued by SEBI, Stock Exchanges, Depositories, FIU-IND and other regulatory authorities from time to time.

The objective of this Policy is to prevent the Company / Member from being used, intentionally or unintentionally, by criminal elements for money laundering, terrorist financing, market abuse, or other unlawful activities.

The Policy lays down the framework for:

1. Client acceptance;
2. Client identification and due diligence;
3. Identification of beneficial ownership;
4. Risk categorisation of clients;
5. Identification and monitoring of Clients of Special Category;
6. Ongoing monitoring of transactions;
7. Identification, scrutiny and reporting of suspicious transactions;
8. Maintenance and preservation of records;
9. Employee screening and training;
10. Internal controls, reporting and review mechanism.

## **2. Scope and Applicability**

This Policy shall apply to all departments, branches, authorised persons, employees, dealers, compliance personnel, operations staff, back-office staff and senior management involved in the business of stock broking and related securities market activities.

Registered Office: Unit No. 207 A, Second Floor, NDM1, Plot No. B 2 3 4, Wazirpur District Centre, Netaji Subhash Place, Pitampura,  
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This Policy shall apply at all stages of the client relationship, including:

1. Client onboarding;
2. KYC and account opening;
3. Trading account activation;
4. Periodic KYC review;
5. Modification of client details;
6. Transaction monitoring;
7. Suspicious transaction analysis;
8. Account closure;
9. Record maintenance after closure of the account.

### **3. Governance Structure**

#### **3.1 Designated Director**

The Company shall appoint a Designated Director as required under PMLA provisions. The Designated Director shall be responsible for ensuring overall compliance with AML/CFT obligations at the senior management level.

#### **3.2 Principal Officer**

The Company shall appoint a Principal Officer who shall be responsible for:

1. Monitoring and reporting of suspicious transactions;
2. Furnishing information to FIU-IND and other authorities, wherever required;
3. Ensuring implementation of AML/CFT systems and controls;
4. Reviewing alerts generated by transaction monitoring systems;
5. Maintaining records of alerts, investigations and reports;
6. Coordinating with regulators, exchanges, FIU-IND and law enforcement agencies;
7. Conducting or arranging AML/CFT training for employees.

#### **3.3 Compliance Officer**

The Compliance Officer shall assist the Principal Officer in implementing the Policy, monitoring regulatory changes, conducting internal checks, and ensuring that processes are followed by business, operations and branch teams.

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## 4. Policy for Acceptance of Clients

The Company shall follow a risk-based client acceptance policy. No client shall be accepted unless the prescribed KYC, due diligence and verification requirements are completed.

### 4.1 General Client Acceptance Principles

The Company shall ensure that:

1. No account is opened in an anonymous, fictitious or benami name.
2. No account is opened where the identity of the client cannot be verified.
3. No account is opened where the Company is unable to identify the beneficial owner, wherever applicable.
4. No account is opened where the information provided by the client is suspected to be false, forged, misleading or incomplete.
5. No account is opened where the client is found in sanctions lists, banned lists, debarred lists, terrorist lists or regulatory prohibition lists.
6. No account is opened where the client refuses to provide necessary KYC documents, income proof, financial details, beneficial ownership details, FATCA/CRS declaration or any other regulatory information.
7. No account is opened where the source of funds appears suspicious or inconsistent with the client's profile.
8. Enhanced due diligence shall be carried out for high-risk clients before activation.
9. Clients shall be categorised as low, medium or high risk based on their profile, background, financial status, geography, occupation, trading pattern and other relevant factors.
10. Client acceptance shall be subject to approval by authorised officials as per internal delegation matrix.

### 4.2 Clients Not to be Accepted

The Company shall not accept or shall discontinue relationship with clients in the following cases:

1. Clients whose identity cannot be verified;
2. Clients whose address or contact details are unverifiable;
3. Clients who provide forged or suspicious documents;
4. Clients who are listed in sanctions / terrorist / banned / debarred lists;
5. Clients who appear to be acting on behalf of another undisclosed person;

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6. Clients who refuse to disclose beneficial ownership;
7. Clients suspected to be engaged in money laundering, terrorist financing, fraud, market manipulation or other unlawful activity;
8. Shell entities or entities with no clear business purpose, unless satisfactorily explained;
9. Clients with opaque ownership structures without adequate explanation;
10. Any other client considered unacceptable by the Compliance Officer / Principal Officer / senior management.

### 4.3 Risk-Based Acceptance

Clients shall be accepted based on risk classification:

<b>Risk Category</b>	<b>Client Type / Example</b>	<b>Acceptance Requirement</b>
Low Risk	Salaried individuals, regulated entities, government bodies, listed companies	Standard due diligence
Medium Risk	HNIs, partnership firms, private companies, clients with active trading profile	Standard due diligence with additional checks where required
High Risk	PEPs, non-residents, trusts, NGOs, companies with complex ownership, clients from high-risk jurisdictions, clients with adverse media	Enhanced due diligence and senior management approval

## 5. Client Due Diligence Process

Client Due Diligence shall be carried out before establishing a business relationship and shall continue during the course of the relationship.

### 5.1 Due Diligence at Account Opening Stage

The Company shall obtain and verify the following:

#### A. For Individual Clients

1. PAN;



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2. Aadhaar / officially valid document, as applicable;
3. Proof of address;
4. Photograph;
5. Bank account proof;
6. Income proof, wherever applicable, especially for derivative trading;
7. Mobile number and email ID verification;
8. Nominee details, wherever applicable;
9. FATCA/CRS declaration;
10. Occupation and annual income details;
11. Politically Exposed Person declaration;
12. Signature verification;
13. Exchange / segment consent and other prescribed declarations.

## **B. For Non-Individual Clients**

Depending on constitution, the Company shall obtain:

1. Certificate of incorporation / registration certificate;
2. PAN of the entity;
3. Memorandum and Articles of Association / partnership deed / trust deed / LLP agreement;
4. Board resolution / authority letter;
5. List of directors / partners / trustees / authorised signatories;
6. Identity and address proof of authorised signatories;
7. Beneficial ownership declaration;
8. Shareholding pattern / ownership structure;
9. Latest financial statements, wherever required;
10. Bank proof;
11. GST / other registration proof, wherever applicable;
12. FATCA/CRS declaration;
13. Details of business activity and source of funds;
14. Details of senior managing officials, wherever beneficial owner cannot be identified through ownership.

## **5.2 Verification Process**

The Company shall verify client identity through reliable and independent sources such as:

1. KRA / CKYC records;

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2. PAN verification;
3. Aadhaar offline verification / officially valid documents, as applicable;
4. Bank verification;
5. In-person verification or video IPV, where applicable;
6. Exchange / depository / regulatory systems;
7. Sanctions and debarred entity screening;
8. Public databases, MCA records and other official sources for non-individual clients.

### **5.3 CKYC / KRA Compliance**

Client KYC records shall be uploaded / updated with KRA / CKYC agencies as per applicable regulatory requirements. Any mismatch, incomplete record or KYC rejection shall be rectified within prescribed timelines.

### **5.4 Periodic Review and KYC Updation**

The Company shall periodically review client KYC details based on risk category:

#### **Client Risk Category Review Frequency**

High Risk	At least once every year or as prescribed
Medium Risk	Periodically as per regulatory requirement
Low Risk	Periodically as per regulatory requirement

Additional review shall be conducted in the following cases:

1. Change in client profile;
2. Change in address, bank details, mobile number or email ID;
3. Significant increase in trading activity;
4. Unusual fund movement;
5. Dormant account reactivation;
6. Regulatory alert;
7. Adverse media;
8. Suspicion regarding authenticity of KYC details.



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## **6. Client Identification Procedures and Programs at Various Stages**

The Company has implemented client identification procedures at the following stages:

### **6.1 Pre-Onboarding Stage**

Before opening an account, the Company collects basic information such as name, PAN, mobile number, email ID, residential / registered address, occupation, income range, bank account details and trading preferences.

The system validates PAN, mobile number, email ID and bank account details, wherever applicable.

### **6.2 KYC and Documentation Stage**

The Company verifies KYC documents submitted by the client with official databases / KRA / CKYC / PAN / bank verification systems. Documents are checked for completeness, validity, consistency and authenticity.

### **6.3 Account Approval Stage**

The account opening team reviews the KYC file. If any discrepancy, mismatch or risk indicator is observed, the case is escalated to Compliance. High-risk clients require enhanced due diligence and approval from authorised senior personnel.

### **6.4 Account Activation Stage**

Trading access is enabled only after:

1. KYC is completed;
2. Required documents are verified;
3. Risk category is assigned;
4. Segment-wise consent is obtained;
5. Bank and demat details are verified;
6. UCC is created and uploaded as per exchange requirements.

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## 6.5 Ongoing Relationship Stage

The Company monitors the client's trading activity, fund movement, margin utilisation, securities movement, profile consistency, regulatory alerts and unusual behaviour during the entire relationship.

## 6.6 Periodic Review Stage

Client details are reviewed periodically and updated based on risk classification and regulatory requirements. The Company may seek updated income proof, bank proof, address proof, beneficial ownership details or other documents.

## 6.7 Dormant / Inactive Account Reactivation Stage

Before reactivation of dormant or inactive accounts, the Company verifies updated KYC details, bank account details, contact details and client consent. Additional due diligence may be conducted if there is any risk indicator.

# 7. Identification of Clients of Special Category

The Company shall identify and maintain records of Clients of Special Category. Such clients shall be subject to enhanced due diligence and closer monitoring.

## 7.1 Clients of Special Category May Include

1. Non-resident clients;
2. High Net-worth Individuals;
3. Trusts, charities, NGOs and organisations receiving donations;
4. Companies having close family shareholding or beneficial ownership;
5. Politically Exposed Persons and their relatives / close associates;
6. Clients from high-risk countries or jurisdictions;
7. Clients with dubious reputation as per public information or adverse media;
8. Clients whose source of funds is unclear;
9. Clients with complex ownership structures;
10. Shell companies or entities with no clear economic purpose;

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11. Clients dealing through power of attorney;
12. Clients with frequent change in address, bank account, mobile number or authorised signatories;
13. Clients with significant cash-intensive business background;
14. Foreign entities or entities having foreign beneficial ownership;
15. Clients appearing in regulatory alerts, exchange alerts, debarred lists or surveillance lists;
16. Clients introduced by unknown or unreliable sources;
17. Clients reluctant to provide complete information;
18. Clients whose transaction behaviour is inconsistent with declared income or profile.

## **7.2 Process for Identification of CSC**

The Company shall identify CSC clients through:

1. Account opening form declarations;
2. PEP declaration;
3. Occupation and income details;
4. Nationality and residential status;
5. Beneficial ownership details;
6. Screening against sanctions, PEP, banned and adverse media lists;
7. Review of ownership and control structure;
8. Transaction monitoring alerts;
9. Regulatory / exchange circulars and alerts;
10. Manual review by compliance team.

## **7.3 Enhanced Due Diligence for CSC**

For CSC clients, the Company may obtain:

1. Additional identity documents;
2. Source of funds declaration;
3. Source of wealth details;
4. Latest financial statements;
5. Income proof;
6. Bank statements;
7. Board / partner / trustee approvals;
8. Detailed beneficial ownership structure;
9. Senior management approval;



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10. Periodic review at shorter intervals.

## **8. Beneficial Ownership Identification Process**

The Company shall identify the natural person who ultimately owns or controls the client or on whose behalf a transaction is being conducted.

### **8.1 Beneficial Ownership for Companies**

For a company, beneficial owner means the natural person who, whether acting alone or together, or through one or more juridical persons, has controlling ownership interest or exercises control through other means.

The Company shall identify natural persons holding ownership / entitlement above the applicable threshold prescribed under PMLA Rules, or any person exercising control through management rights, shareholding agreements, voting agreements or other arrangements.

### **8.2 Beneficial Ownership for Partnership Firms / LLPs**

For partnership firms / LLPs, the Company shall identify natural persons having ownership or entitlement to capital or profits above the prescribed threshold or exercising control through other means.

### **8.3 Beneficial Ownership for Trusts**

For trusts, the Company shall identify:

1. Author of the trust;
2. Trustees;
3. Beneficiaries having prescribed interest;
4. Protector, if any;
5. Any other natural person exercising ultimate effective control.

### **8.4 Beneficial Ownership for Unincorporated Associations / Body of Individuals**

The Company shall identify natural persons having ownership or entitlement to property, capital or profits above the prescribed threshold or exercising control.

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## 8.5 Senior Managing Official

Where no natural person is identified through ownership or control, the Company shall identify the relevant natural person holding the position of Senior Managing Official.

## 8.6 Documents for Beneficial Ownership Verification

The Company may obtain:

1. Beneficial ownership declaration;
2. Shareholding pattern;
3. Register of members / partners;
4. Group structure chart;
5. Details of holding and subsidiary companies;
6. Identity and address proof of beneficial owners;
7. Board resolution or authorised signatory list;
8. MCA / ROC records;
9. Trust deed / partnership deed / LLP agreement;
10. Any other document required to establish ownership and control.

## 9. Prevention of Fictitious / Benami Accounts

The Company has systems and procedures to ensure that no account is opened in a fictitious, anonymous or benami name.

### 9.1 Controls Implemented

1. Mandatory PAN verification before account opening;
2. Verification of officially valid documents;
3. KRA / CKYC verification;
4. Bank account verification;
5. Mobile and email OTP verification;
6. In-person verification / video verification, wherever applicable;
7. Matching of name across PAN, bank account, demat account and KYC records;
8. Verification of client photograph and signature;
9. Screening against duplicate records;
10. Restriction on third-party bank accounts;

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11. Restriction on third-party funds and securities;
12. Beneficial ownership verification for non-individual clients;
13. Power of attorney / authorised signatory verification;
14. Compliance review for mismatch cases.

## **9.2 Escalation of Suspicious Cases**

If any mismatch, impersonation, forged document, undisclosed third-party control or benami suspicion is observed, the account shall not be activated and the matter shall be escalated to the Compliance Officer / Principal Officer for review.

## **10. Ongoing Monitoring of Transactions**

The Company has systems and procedures for continuous monitoring of client transactions to detect suspicious, unusual or inconsistent activity.

### **10.1 Monitoring Coverage**

The monitoring system covers:

1. Trading turnover;
2. Trading frequency;
3. Sudden increase in activity;
4. Illiquid scrip trading;
5. Penny stock transactions;
6. Circular / reversal / structured trades;
7. Concentrated trading in specific scrips;
8. Unusual profit or loss patterns;
9. Client trading inconsistent with income profile;
10. Fund pay-in and pay-out patterns;
11. Securities movement;
12. Margin funding / margin shortfall behaviour;
13. Frequent bank account modification;
14. Dormant account reactivation and immediate high-volume trades;
15. Trades in scrips under surveillance measures;
16. Trades by clients appearing in exchange / SEBI alerts;
17. Third-party fund transfer attempts;

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18. Off-market transfer alerts, wherever applicable;
19. Unusual client behaviour or reluctance to provide information.

## 10.2 Parameters for Alert Generation

The Company has alert parameters based on:

1. High turnover compared to declared income;
2. High-value trades in illiquid securities;
3. Repeated trades resulting in no economic rationale;
4. Sudden activity in dormant accounts;
5. Frequent losses without commercial logic;
6. Frequent client detail modification;
7. Trading in securities under ASM/GSM/surveillance measures;
8. Reversal trades or synchronised trade indications;
9. Multiple clients sharing common address, mobile, email, bank account, device, IP or introducer;
10. Fund transfers inconsistent with client profile;
11. Unusual activity by PEP / high-risk client;
12. Alerts received from exchanges, depositories, FIU-IND, SEBI or other regulators.

## 10.3 Manual and System-Based Monitoring

The Company follows both system-based and manual monitoring. System-generated alerts are reviewed by the surveillance / compliance team. Manual alerts may also arise from branch observations, dealer inputs, client behaviour, exchange communications, audit findings or adverse media.

# 11. Process of Scrutinising Alerts and Reporting Suspicious Transactions

## 11.1 Alert Review Process

The following process shall be followed:

1. System generates alert based on predefined parameters.
2. Compliance / surveillance team reviews the alert.

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3. Client KYC, income, occupation, trading history and risk category are checked.
4. Transaction pattern is compared with historical behaviour.
5. Supporting documents / explanation may be sought from the client, wherever required.
6. Dealer / branch remarks may be obtained.
7. If the explanation is satisfactory, the alert is closed with documented reasons.
8. If the explanation is unsatisfactory or suspicion remains, the alert is escalated to the Principal Officer.
9. Principal Officer reviews the case and decides whether it qualifies as suspicious.
10. If suspicious, STR shall be filed with FIU-IND as per prescribed procedure and timeline.
11. The client shall not be informed about STR filing or proposed STR filing.

## 11.2 Suspicious Transaction Indicators

Examples of suspicious indicators include:

1. Transactions inconsistent with client's declared income or profile;
2. Frequent high-value trading without apparent economic rationale;
3. Trading in illiquid or penny stocks without justification;
4. Reversal / circular / synchronised trading pattern;
5. Sudden trading activity in a dormant account;
6. Client avoiding KYC update or source of funds clarification;
7. Use of third-party funds;
8. Multiple accounts apparently controlled by one person;
9. Unusual profit generation or loss transfer;
10. Frequent changes in bank details, address, mobile number or email ID;
11. Activity linked to adverse media or regulatory action;
12. Client attempting to conceal beneficial ownership;
13. Transactions suspected to involve proceeds of crime;
14. Any attempted transaction appearing suspicious, even if not completed.

## 11.3 Reporting to FIU-IND

The Principal Officer shall report suspicious transactions to FIU-IND in the prescribed format and manner. Records of analysis, reasons for suspicion, supporting documents and STR filing acknowledgment shall be maintained confidentially.

The Company shall ensure that no tipping-off is done to the client, employee or any unauthorised person regarding suspicious transaction reporting.

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## **12. Records of Transactions to be Maintained under Rule 3 of PMLA Rules**

The Company shall maintain records of transactions as prescribed under Rule 3 of the PMLA Rules, including but not limited to:

1. All cash transactions of value exceeding the prescribed threshold;
2. Series of cash transactions integrally connected to each other and exceeding the prescribed threshold within a month;
3. Transactions involving receipts by non-profit organisations above the prescribed threshold;
4. Cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine;
5. Transactions involving forgery of valuable security or documents;
6. All suspicious transactions, whether or not made in cash;
7. Cross-border wire transfers above the prescribed threshold, wherever applicable;
8. Any other transaction prescribed by PMLA, FIU-IND, SEBI, Stock Exchanges or other regulators from time to time.

### **12.1 Details to be Maintained**

Records shall contain sufficient information to permit reconstruction of individual transactions, including:

1. Nature of transaction;
2. Amount and currency;
3. Date of transaction;
4. Parties to the transaction;
5. Client code / UCC;
6. Segment and exchange;
7. Scrip / contract details;
8. Order and trade details;
9. Payment and receipt details;
10. Bank and demat details;
11. Supporting documents and internal notes, wherever applicable.

### **12.2 Preservation Period**

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Records of transactions shall be preserved for a minimum period of five years from the date of transaction or such longer period as may be prescribed by law or regulator.

Records of identity of clients, beneficial owners, account files and business correspondence shall be maintained for a minimum period of five years after the business relationship has ended or the account has been closed, whichever is later.

### **13. AML/CFT Alignment with PMLA Requirements**

The Company's AML/CFT framework is aligned with PMLA requirements through the following controls:

1. Appointment of Designated Director and Principal Officer;
2. Client acceptance policy;
3. Risk-based client due diligence;
4. Beneficial ownership identification;
5. Enhanced due diligence for high-risk clients;
6. Screening against sanctions, debarred and regulatory lists;
7. Ongoing monitoring of transactions;
8. System-generated alerts;
9. Suspicious transaction review and reporting process;
10. Record maintenance and preservation;
11. Employee training;
12. Internal audit and compliance review;
13. Confidentiality and prohibition on tipping-off;
14. Periodic policy review based on regulatory changes.

### **14. Screening of Employees While Hiring**

The Company has adequate systems and procedures for screening employees at the time of hiring.

#### **14.1 Employee Screening Process**

Before hiring employees, the Company may conduct:

1. Identity verification;
2. Address verification;

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3. Educational qualification verification;
4. Previous employment verification;
5. Reference checks;
6. Police verification, wherever considered necessary;
7. Verification of regulatory / disciplinary history, wherever applicable;
8. Fit and proper assessment for sensitive roles;
9. Conflict of interest declaration;
10. Insider trading / personal trading declaration, wherever applicable.

## 14.2 Sensitive Roles

Enhanced screening shall be conducted for employees handling:

1. Client onboarding;
2. KYC verification;
3. Fund transfers;
4. Securities transfers;
5. Dealing desk;
6. Risk management;
7. Compliance;
8. Back-office operations;
9. Surveillance;
10. System administration.

## 14.3 Ongoing Employee Monitoring

Employees shall be required to comply with the Company's code of conduct, confidentiality obligations, personal trading policy, conflict of interest policy and AML/CFT requirements.

Any suspicious conduct by an employee shall be reviewed by HR / Compliance / senior management and disciplinary action may be initiated, wherever required.

## 15. AML/CFT Training to Employees

The Company shall provide AML/CFT training to employees on a periodic basis.

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## 15.1 Training Coverage

Training shall cover:

1. Overview of PMLA and SEBI AML/CFT requirements;
2. Client acceptance policy;
3. KYC and client due diligence requirements;
4. Identification of beneficial ownership;
5. Identification of Clients of Special Category;
6. Risk categorisation of clients;
7. Suspicious transaction indicators;
8. Transaction monitoring alerts;
9. Escalation process;
10. STR reporting process;
11. Confidentiality and prohibition on tipping-off;
12. Record maintenance obligations;
13. Employee responsibilities and consequences of non-compliance.

## 15.2 Training Frequency

Training shall be conducted:

1. At the time of joining for relevant employees;
2. Periodically for existing employees;
3. Whenever there is a major regulatory change;
4. Whenever internal audit / inspection identifies training gaps;
5. For branch / authorised person teams based on business requirements.

## 15.3 Training Records

The Company shall maintain records of training sessions, including:

1. Date of training;
2. Mode of training;
3. Trainer details;
4. Topics covered;
5. List of participants;
6. Attendance record;

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7. Test / assessment results, wherever applicable;
8. Training material used.

## 16. Risk Categorisation of Clients

The Company shall classify clients into low, medium and high risk categories based on relevant risk factors.

### 16.1 Risk Factors

Risk categorisation shall consider:

1. Client type;
2. Residential status;
3. Occupation / business activity;
4. Income range and net worth;
5. Source of funds;
6. Country / geography risk;
7. PEP status;
8. Ownership structure;
9. Trading pattern;
10. Products and segments opted for;
11. Regulatory / adverse media history;
12. Beneficial ownership transparency;
13. Mode of onboarding;
14. Activity in high-risk securities or segments.

### 16.2 Review of Risk Category

Risk category may be revised based on:

1. Change in client profile;
2. Change in beneficial ownership;
3. Unusual trading activity;
4. Suspicious transaction alerts;
5. Adverse news;
6. Regulatory directions;



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7. Internal compliance review.

## 17. Enhanced Due Diligence

Enhanced due diligence shall be conducted for high-risk clients and suspicious cases.

EDD may include:

1. Obtaining additional KYC documents;
2. Obtaining source of funds / source of wealth;
3. Obtaining latest income proof / financial statements;
4. Obtaining bank statements;
5. Verification of business activity;
6. Detailed beneficial ownership review;
7. Senior management approval;
8. Closer transaction monitoring;
9. More frequent KYC review;
10. Restrictions on account activity until satisfactory clarification is received.

## 18. Confidentiality and Prohibition on Tipping-Off

All employees, directors, authorised persons and associates shall maintain confidentiality of AML/CFT records, internal investigations, suspicious transaction analysis and reports filed with FIU-IND.

No person shall disclose to the client or any unauthorised person that a suspicious transaction report has been filed or is being considered.

Violation of confidentiality or tipping-off restrictions may result in disciplinary action and regulatory consequences.

## 19. Internal Audit and Review

The Company shall conduct periodic internal review / audit of AML/CFT systems and controls.

The review may cover:

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1. KYC documentation quality;
2. Risk categorisation;
3. Beneficial ownership records;
4. CSC identification;
5. Alert generation and closure process;
6. STR escalation and reporting records;
7. Record maintenance;
8. Employee training;
9. Branch compliance;
10. Implementation of regulatory updates.

Audit findings shall be placed before senior management / board / partners and corrective action shall be tracked.

## **20. Regulatory Reporting and Cooperation**

The Company shall cooperate with SEBI, Stock Exchanges, Depositories, FIU-IND and other lawful authorities.

The Company shall furnish information, records and documents as required by competent authorities within prescribed timelines.

The Principal Officer shall maintain records of all regulatory submissions, FIU filings, inspection responses and related communication.

## **21. Policy Review and Updates**

This Policy shall be reviewed at least annually or earlier in case of:

1. Amendment to PMLA / PML Rules;
2. SEBI circular / master circular update;
3. FIU-IND direction;
4. Stock Exchange / Depository circular;
5. Internal audit recommendation;
6. Change in business model or systems;
7. Inspection observations;
8. Any major AML/CFT risk event.

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All changes shall be approved by senior management / board / designated authority.

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