

Amit Jasani Financial Services Pvt. Ltd.

Member : National Stock Exchange of India Ltd.
Bombay Stock Exchange Ltd.

Registered Office : Hind Rajasthan Chambers, 3rd Floor, 6, Oak Lane, Fort, Mumbai-400 001.
Tel.: 6614 5678 / 6614 5641 • Fax: 6614 5656 • E-mail: ajfsl@nayaissue.com

nayaissue
www.nayaissue.com



PMLA POLICY

FOR

**AMIT JASANI FINANCIAL
SERVICES PVT. LTD.**

Address: - Hind Rajasthan Chambers, 3rd Floor,
6, Oak Lane, Fort, Mumbai – 400 001.

Amit Jasani Financial Services Pvt. Ltd.

Member : National Stock Exchange of India Ltd.
Bombay Stock Exchange Ltd.

Registered Office : Hind Rajasthan Chambers, 3rd Floor, 6, Oak Lane, Fort, Mumbai-400 001.
Tel.: 6614 5676 / 6614 5677 Fax: 6614 5666 E-mail: ajfs@nayaissue.com



PMLA Compliance Policy

DOCUMENT CONTROL PAGE

Document Name	PMLA Compliance Policy
---------------	------------------------

Authorization	Document Owner	Reviewed by	Authorized by
Name	AmitJasani Financial Services Pvt. Ltd.		
Signature			

Classification	Official Use Only
Distribution List	Employees of Back Office Department

All queries, suggestions and changes required may be emailed to Mr. Narendra K. Jasani (Principal Officer).

The information contained in this document is CONFIDENTIAL and may be legally PRIVILEGED. Any disclosure, copying, distribution, dissemination, forwarding, printing or any action taken in reliance on it or utilizing the same for any purpose other than what it is intended for, without consulting **Amit Jasani Financial Services Pvt. Ltd.** is prohibited and may be unlawful.

COMPLIANCE OF PREVENTION AND MONEY LAUNDERING ACT (PMLA)

Overview

This Policy describes the documents to be submitted by the client and maintaining of the records by the Organisation. Further it also describes the monitoring process of the Principal Officer in case of any suspicion.

Scope

This policy applies to all the employees of the Organisation including temporary employees, employees on contract etc.

Policy

KYC Document collection

1. The Back Office Department shall classify the clients from whom the KYC Documents are to be collected. The client shall be classified on the basis of Type of Customer, Nature of the business, Risk asserted by the client etc.
2. The Back Office Department shall provide the necessary details to the clients regarding registration procedure and submission of relevant documents.
3. In case the requisite documents are not submitted by the prospective client, the department shall follow up with such client. The client shall be intimated that the registration shall not be allowed until minimum required documents are submitted.
4. On any default by the client and/ or failure in the submission of the documents the department shall inform the same to the Compliance Officer.
5. The Back Office Department shall request the client to submit the requisite documents within specified period of time. In case the requested document is not submitted by the client, the Back Office Department shall follow up with the client to submit the documents immediately within the grace period.
6. Documents required to submit by different client shall include:

a) Documents needed for verification of an individual:

Amit Jasani Financial Services Pvt. Ltd.

Member : National Stock Exchange of India Ltd.
Bombay Stock Exchange Ltd.

Registered Office : Hind Rajasthan Chambers, 3rd Floor, 6, Oak Lane, Fort, Mumbai-400 001.
Amit Jasani Financial Services Pvt. Ltd. Tel: 022 5012 7001, 5014 5011 Fax: 022 5014 5500 E-mail: ajfs@nayaissue.com

nayaissue
www.nayaissue.com

PMLA Compliance Policy

- a) One certified copy of an officially valid document containing details of his/her permanent address or addresses, current address or addresses; and
- b) One copy of his/her recent photograph; and
- c) All other documents including in respect of the nature of business and financial status of the client as may be required

Officially valid document includes the passport, the driving license, the Permanent Account Number (PAN) Card, the Voter's Identity Card issued by the Election Commission of India or any other document as required.

b) Documents needed for verification of Company

- a) Certificate of incorporation;
 - b) Memorandum and Articles of Association;
 - c) A resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf; and
 - d) An officially valid document in respect of managers, officers or employees holding an attorney to transact on its behalf.
7. The designated personnel of the Back Office Department shall verify all the documents submitted by the client to confirm its authenticity. Further such personnel shall ensure that all the documents are attested by the client by signature or thumb impression.
8. In case the address as specified in the application is different from that specified in the address proof, the Back Office Department shall thoroughly scrutinize the address proof. The designated personnel shall enquire the reason for above with the Customer. If required, the client shall be insisted to provide the proof for address specified in the application form.
9. Back Office Department shall follow a risk based approach towards certification of documents. In case of low risk customers self attested copies shall be considered sufficient. In case of high-risk customers, the identification documents shall be required to be attested by gazetted officers or notarized by the Notary Public.

10. After verification of the documents, it may be noticed that all the documents may not be provided by the client / prospective client or erroneous documents have been provided by the client. In such case the designated personnel shall immediately intimate the same to the Client by email and telephonic communication.
11. In case the requested document is not submitted by the client, the department shall follow up with the client to submit the documents immediately with the grace period. In case the documents are not submitted by the client, the department shall report the same to the Compliance Officer.

Risk Assessment

The Back office department shall carry out risk assessment to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk with respect to our clients, nature and volume of transactions, payment methods used by the clients, etc.

The Back Office department while carrying out risk assessment, shall take into account any country specific information that is circulated by the Government of India and SEBI from time to time.

The risk assessment carried out shall consider all the relevant risk factors before determining the level of overall risk and the appropriate level and type of mitigation being applied. The assessment shall be documented, updated regularly and made available to competent authorities and self regulating bodies, as and when required.

The following websites can be accessed to carry out the risk assessment at http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml and <http://www.un.org/sc/committees/1988/list.shtml>.

Reliance on third party for carrying out Client Due Diligence (CDD)

The Back office department while carrying out client due diligence for reliance on third party :-

- a) Shall carry out identification and verification of the identity of a client

- b) Determination of whether the client is acting on behalf of a beneficial owner, identification of the beneficial owner and verification of the identity of the beneficial owner.
- c) Such third party shall be regulated, supervised or monitored for and have measures in place for compliance with CDD.
- d) Such reliance shall be in accordance with the regulations and circulars/guidelines issued by SEBI from time to time under PML rules.

Maintenance of Documents and Records

- 1. All suspicious transactions whether or not made in cash by way of credits or debits into or from any demat account, money transfer from or remittance etc shall be maintained.
- 2. All records maintained by the Back Office Department shall contain details such as the nature of transactions, amount and date of the transactions, details of the parties to the transactions etc. Such records should maintain in soft copy as well as hard copy.
- 3. All the records pertaining to transactions of clients shall be maintained for the period of five years from the date of cessation of the such transaction.
- 4. Records evidencing the identity of all the clients and beneficial owners as well as account files and business correspondence shall be maintained and preserved for a period of five years after the business relationship between a client and us has ended or the account has been closed, whichever is later.
- 5. We shall maintain and preserve the record of documents evidencing the identity of our clients and beneficial owners (e.g. copies or records of official identification documents like passports, identity cards, driving licenses or similar documents) as well as account files and business correspondence for a period of five years after the business relationship between a client and us has ended or the account has been closed, whichever is later
- 6. We shall maintained and preserved the transactions monitores for a period of five years from the date of transaction between the client and us.
- 7. We shall maintain and preserve the record of information related to transactions, whether attempted or executed, which are reported to the Director, FIU-IND, as required under Rules 7 & 8 of the PML Rules, for a period of five years from the date of the transaction between the client and us.

Submission of Reports

1. The Back Office Department shall maintain and submit reports for suspicious transaction reports etc to the prescribed authority. Suspicious transaction report may include false identification documents of the client, unusual activity as compared to the past transactions, sudden activity in the dormant account etc.
2. Submission of such reports shall be made within the time limit prescribed as follows -
 - Suspicious transaction reports shall be submitted in writing or by fax or electronic mail within three working days from the date of occurrence of the transactions.
 - Notifications issued by SEBI require STR to be reported within 7 working days of establishment of suspicion at the level of Principal Officer.
3. Report shall be submitted in the form specified as follows:

Suspicious Transaction Reports in manual format consists of following forms:

Form	Information	To be submitted by
Suspicious Transaction Report	Details of suspicious transactions, accounts and persons/entities linked to such transactions	Principal officer of the intermediary
Individual Detail Sheet	Identification details of individual	Reporting Individual
Legal Person/ Entity Detail Sheet	Identification details of legal person /entity	Reporting Individual
Account Detail Sheet	Details of the account, account holder and related persons.	Reporting Individual

Monitoring Process

Amit Jasani Financial Services Pvt. Ltd.

Member : National Stock Exchange of India Ltd.
Bombay Stock Exchange Ltd.

Registered Office : Hind Rajasthan Chambers, 3rd Floor, 6, Oak Lane, Fort, Mumbai-400 001.
Tel: 022 5577 1664, 5577 1665 Fax: 022 5577 1666 E-mail: ajfsl@nayaissue.com

nayaissue
www.nayaissue.com

PMLA Compliance Policy

1. Compliance Officer shall ensure continuous monitoring of the transactions of the Customers to identify suspicious transactions. Following transactions / activities may be identified as Suspicious transactions as notified by SEBI
 - Cheque towards the investment is issued by payer other than the account holder and the account holder refuses to give declaration that the source of fund is legitimate.
 - Client is reluctant in providing information.
 - Investor induces towards non filing of returns or forms to regulatory bodies.
 - Unusual request is made from the client like not sending account statements.
 - Sudden increase \ decrease in the number of transactions by the client.
 - Inoperative accounts suddenly become operative.
 - There are frequent changes in the address of client.
 - Documents sent to the client are returned undelivered frequently.
 - Off Market Transactions insist by the client.
2. Such activities shall be informed to Financial Intelligence Unit (FIU) by the Compliance Officer within seven days of such confirmation. Such intimation shall include Client name, Account number, Reason for suspicion etc in the specified format through courier/ post or email.

Appointment of Designated Director

With reference to Circular Ref.No. CIR/MIRSD/1/2014 dated March 12, 2014, we have appointed Mr. Amit Kanaiyalal Jasani, Whole Time Director as a "Designated Director" to ensure overall compliance under Anti-Money laundering/Countering the Financing of Terrorism (AML/CFT) obligations of securities market under PML Act, 2002 and Rules framed there.

Disciplinary Action

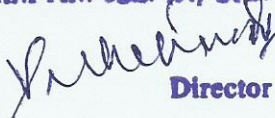
A violation of standards, procedures or guidelines established pursuant to this policy shall be presented to Compliance Officer for appropriate action and could result in disciplinary action, including expulsion, dismissal, and/or legal prosecution

REVIEWED ON 11TH JULY, 2014

For Office Use

Page 8 of 8

For AMIT JASANI FIN. SER. (P.) LTD.


Director