

# Stock Broker Training Programs

## Anti Money Laundering

In order to discharge the statutory responsibility to detect possible attempts of money laundering, financing of terrorism or any other proceeds of crime, Market Intermediaries need to have an AML program that should, at a minimum, include:

- \* Principal Officer
- \* Internal policies, procedures, and controls;
- \* Recruitment of staff;
- \* Training of Staff on PMLA awareness;
- \* Identifying and Reporting Suspicious Transactions
- \* Record Keeping and Retention of Records
- \* Review of the policy

### Internal policies, procedures and controls:

#### Know Your Client (KYC):

Considering the potential threat of usage of the financial services by a money launderer, it is essential to make reasonable efforts to determine the true identity of clients accounts requesting for trading. While opening the account of the client obtain copies of the mandatory documents that are prescribed by SEBI and verify the same with the originals as per the procedures laid down in the operating instructions & communiques issued by exchanges and SEBI to us. Such communiques are issued to us based on mandatory requirements given by SEBI from time to time and based on operational requirements. We are thus responsible for following the client identification procedures & procedures to obtain requisite details for proper identification of new customers. We must follow the Customer Due Diligence (CDD).

- **Recruitment & Training of employees:** We would ensure adequate screening procedures when appointing employees. It would ensure that the employees dealing with PMLA requirements are suitable and competent to perform their duties.

- **Identifying & reporting Suspicious Transactions:** Any suspicious transaction should be immediately notified to the Principal Officer. The notification may be done in the form of detailed report with specific reference to the clients, transactions and the nature/reason of suspicion.

- **Record Keeping and Retention of Records:** PMLA stipulates that all relevant documents like account opening and their supporting documents should be maintained at least for a minimum period of 10 years after the account is closed.

In view of this, We maintain the records in terms of the provisions of PMLA. The retention period shall be modified on receiving appropriate instructions from any regulatory authority like SEBI, FIU-IND or any other statutory authority. We will also follow the procedures for regular back up, etc. The records of the transactions in clients accounts shall be maintained for a period of 10 years as required by PMLA.

- **Review of Policy:** We shall review the aforesaid policy at regular intervals. Partner & CEO shall be the authority to give directions for review of policy and undertake additions, changes, modifications etc. as directed by SEBI/ FIU-IND.