



Prevention of Money Laundering Act (PMLA) Policy

Satish Rajan N, Investment Adviser, SEBI Registration No INA200002189

Type of Registration : Individual

1. Objective

This policy is framed to comply with the Prevention of Money Laundering Act, 2002, SEBI's guidelines and other applicable regulations. It ensures robust internal control systems to prevent and detect money laundering and terrorist financing activities.

2. Scope

This policy applies to all employees, partners and stakeholders involved in the operations of **Satish Rajan N, Investment Adviser**.

3. Definitions

- **Money Laundering:** As defined in Section 3 of the PMLA, money laundering involves engaging in transactions involving property derived from a criminal activity to make it appear legitimate.
 - **Client:** Refers to any person availing investment advisory services.
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4. Key Principles

- Adherence to all regulatory requirements.
 - Ensuring Know Your Customer (KYC) compliance.
 - Ongoing monitoring of transactions.
 - Reporting of suspicious transactions.
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5. KYC and Client Onboarding

- **Client Identification Procedure (CIP):**
 - Verify identity and address through valid documents such as Aadhaar, PAN, Passport, etc.
 - Verify beneficial ownership in case of non-individual clients.
 - **Risk Categorization:**
 - Clients will be categorized as Low, Medium or High Risk based on factors like occupation, source of funds and geography.
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6. Ongoing Monitoring

- Regular review of client transactions to ensure consistency with known financial status.
 - Identification of deviations or suspicious activities such as:
 - High-value transactions inconsistent with client profile.
 - Transactions involving politically exposed persons (PEPs).
 - Activities involving countries with inadequate AML/CFT frameworks.
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7. Suspicious Transaction Reporting (STR)

- File STR with the **Financial Intelligence Unit-India (FIU-IND)** for any activity that raises suspicion of money laundering or terrorist financing.
 - Maintain confidentiality of STR filings and avoid tipping off clients.
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8. Record-Keeping

- Maintain records of client identification, transactions and STRs for a minimum of five years.
 - Ensure documents and electronic records are readily retrievable.
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9. Training and Awareness

- Conduct periodic training programs for employees to recognize and report suspicious activities.
 - Update staff on changes in AML/CFT laws and regulations.
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10. Internal Controls and Audit

- The Investment Adviser is the Principal Officer responsible for AML compliance.
 - Conduct internal audits to review adherence to PMLA policy and report findings to senior management.
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11. Penalties and Disciplinary Actions

Non-compliance with this policy or the applicable laws will attract disciplinary actions, including termination of employment or engagement.



12. Policy Review

This policy will be reviewed annually or upon significant regulatory changes.

Approved by:



Satish Rajan N
[Authorized Signatory]



Date: 30th June 2024