

POLICYFORPREVENTIONOFMONEYLAUNDERINGA
CT(PMLA)

&

ANTIMONEYLAUNDERING(AML)

AMRAPALI CAPITAL AND FINANCE SERVICES LIMITEDA

AMRAPALI HOUSE, NEAR TAJ HOTEL, ON SINDHU BHAVAN ROAD AHMEDABAD 380058

Updated Date 30-05-2026

AMRAPALI CAPITAL AND FINANCE SERVICES LIMITED (hereinafter referred to as **ACFSL**) had designed this Policy of PMLA and effective AML program to prohibit and actively prevent the money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities or flow of illegal money or hiding money to avoid paying taxes.

This policy provides detailed procedures to be followed to ensure compliance with issues related to **Know Your Client (KYC) Norms, Anti Money Laundering (AML), Client Due Diligence (CCC) And Combatting Financing of Terrorism (CFT)**.

Policy specifies the need for Additional disclosures to be made by the clients to address concerns of Money Laundering and Suspicious transactions undertaken by clients and reporting to **Financial Intelligence Unit (FIU-INDIA)**.

MONEY LAUNDERING

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets.

FINANCIAL INTELLIGENCE UNIT (FIU) INDIA

The Government of India has set up Financial Intelligence Unit (FIU-India) on November 18, 2004 as an independent body to report directly to the Economic Intelligence Council (EIC) headed by the Finance Minister

FIU –India has been established as the central national agency responsible for receiving, processing, analyzing and disseminating information relating to suspicious financial transactions. FIU India is also responsible for coordination and stretching efforts of national and international intelligence and enforcement agencies in pursuing the global efforts against money laundering and related crimes.

THE PREVENTION OF MONEY LAUNDERING ACT, 2002 (PMLA)

The Prevention of Money Laundering Act, 2002 (PMLA) has been brought into force with effect from 1st July, 2005. Necessary Notifications / Rules under the said Act have been published in the Gazette of India on 1st July 2005 by the Department of Revenue, Ministry of Finance, and Government of India.

As per PMLA, every banking company, financial institution (which includes chit fund company, a co-operative bank, a housing finance institution and a non-banking financial company) and Intermediary (which includes a depository participants, stock-broker, sub-broker, commodity broker, share transfer agent, banker to an issue, trustee to a trust deed, registrar to an issue, merchant banker, underwriter, portfolio manager, investment adviser and any other intermediary associated with securities market and registered under section 12 of the Securities and Exchange Board of India Act, 1992) shall have to maintain a record of all the transactions, the nature and value of which has been prescribed in the Rules notified under the PMLA.

ANTI-MONEY LAUNDERING PROGRAM

The objective of having an AML program is to have in place adequate policies and procedures that help to prevent money-laundering activities. This policy aims to cover trading as well as demat operations of the Rajvi Stock Broking P. Limited. Such procedures would include the following:

PRINCIPLE OFFICER&DIRECTOR DESIGNATED FOR AML PURPOSE

APPOINTMENT:

Mr. Baldev Manubhai Patel has been appointed as a **“Principal Officer and Designated Director”** under the provisions of the PMLA till such time SEBI & Stock Exchanges identifies an official to act as such.

ADDRESS:-

Amrapali House, Near Taj Hotel, Opp. Monte Cresto, On Sindhu Bhavan Road, Bopal, Ahmedabad 380058

CONTACT DETAILS: -

Phone No: - +912717429100/01/02

Email Id: - compliance.ex@amrapali.com

RESPONSIBILITIES:-

- ❖ Compliance of the provisions of the PMLA and AML guidelines and act as a central reference point and play an active role in identification as assessment of potentially suspicious transactions
- ❖ He ensures that ACFSL discharge its legal obligations to report suspicious transactions to the concerned authorities.
- ❖ To update the management regarding any changes / additions and modifications in the PMLA provisions.

STRUCTURE OF THIS POLICY: -

The main aspect of this policy is the Customer Due Diligence process, which means:

- ❖ Obtaining sufficient information about the client in order to identify who is the beneficial owner of the securities or on whose behalf transactions are conducted.
- ❖ Verify the customers, identity using reliable & independent source document, data or information.
- ❖ Conduct ongoing due diligence and scrutiny of the account/client to ensure that the transactions conducted are consistent with the clients' background/financial status, its activities and riskprofile

THE CUSTOMER DUE DILIGENCE PROCESS INCLUDES THREE SPECIFIC PARAMETERS:

- ❖ Policy for Acceptance of Clients

- ❖ Client Identification Procedure
- ❖ Suspicious Transactions Identification, Monitoring & Reporting

CUSTOMER ACCEPTANCE POLICY

It is essential to make reasonable efforts to determine the true identity of the clients and ACFSL shall put in place effective procedures to obtain requisite details for proper identification of new clients.

KYC PROCEDURE:-

- ❖ All KYC documentation and procedures prescribed by the Exchanges and SEBI shall be followed at the time of account opening.
- ❖ Clearly establish the identity of the client, verification of the addresses and other details.
- ❖ All details in the form shall be filled in by the clients without fail
- ❖ Verify the genuineness of the PAN provided by the client by comparing with the original PAN and checking with Income-Tax website before uploading UCC details.
- ❖ Documents shall be accepted as per the checklists given from time to time
- ❖ Verify whether the client is a politically exposed person or is a relative of a politically exposed person.
- ❖ Photocopies submitted by the clients shall be compulsorily verified with original
- ❖ Client account shall not be opened in case the client fails to submit any required documents
- ❖ In-person verification of the client has to be done by the employees, Sub-Brokers or Authorized persons of ACFSL
- ❖ Obtain sufficient information in order to identify persons who beneficially own or control the trading & demat account
- ❖ No compromise on submission of mandatory information – Accounts should not be opened where the client

Refuses to provide information/documents

- ❖ No account is opened in a fictitious/ benami name or on an anonymous basis

The Clients / Intermediaries should generally be aware about the following :

-Clients, are instructed to submit financial proofs as required by the SEBI/Exchanges

-No cash dealings will be undertaken.

-No dealings will be permitted through un-registered intermediaries.

-No business will be transacted with any of the suspended or expelled or defaulting Trading Members.

-No business will be undertaken with or for the trading members who are prohibited to transact, including suspended/expelled/ defaulter trading members, defaulting constituents and employees of other trading members.

-No off market deals will be executed.

-Trades executed for a constituent will not be subsequently transferred to another constituent or for own purposes unless and otherwise permitted by the Exchange in genuine cases in Error Code.

-No third party receipt or payment of funds and / or securities shall be permitted.

Any change in the risk profile of the client, has to be ascertained by the concerned officials/Authorized persons, and must report to the Head office immediately. High degree of due diligence shall be applied in respect of clients of special category.

The Principal Officer/Compliance Team may give instructions on risk parameters from time to time.

List of Designated Individuals/Entities

Before client opens an account, ACFSL will verify the name & PAN of clients with names in any of the following lists:

1. An updated list of individuals & entities as approved by the Security Council Committee pursuant to various UN Security Council Resolutions at the time of account opening and also scans the said data base on continuous basis for all registered clients.
2. Clients Debarred by Regulatory authorities like SEBI, Exchanges, Depositories etc.
3. Regulatory authority has taken/ proposed actions under IPC or taken penal proceedings against any proposed client
4. Such other list that may be specified by the Regulators / Compliance Department from time to time like person having known criminal background is not banned in any other manner, whether in terms of criminal or civil proceedings by any enforcement agency worldwide, web-sites like watch out investors, Search engines like Yahoo, Google, etc.

CLIENTS OF SPECIAL CATEGORY:-

Due care shall be taken while accepting clients of Special category.

Clients of Special Category include but shall not be limited to the following

- ❖ Non Residents Clients
- ❖ High Net Worth Clients
- ❖ Trust, Charities, Non Government Organizations (NGOs) and Organizations receiving donations
- ❖ Companies having close family shareholdings or beneficial ownership
- ❖ Politically exposed persons (PEP) of foreign origin
- ❖ Companies offering foreign exchange offerings
- ❖ Clients in high risk countries
- ❖ Non face to face clients
- ❖ Clients with dubious reputation as per public information available

TREATMENT OF ACCOUNTS OF CLIENTS OF SPECIAL CATEGORY

1. NRI: - While opening NRI account utmost care should be exercised. Collect the following documents
 - ❖ PAN Card Copy
 - ❖ Pass Port Copy with date of arrival in case personal visit
 - ❖ Indian & foreign Address Proof
 - ❖ Cancelled cheque copy of NRE A/c, along with PIS permission issued from RBI & Bank statement copy
 - ❖ Client master copy for demat account
 - ❖ FEMA declaration
2. High Net worth Clients:-High Net worth clients could be classified as such if at the account opening stage or during the course of the relationship, it is realized that the client's investments or the appropriate for investment is high.
3. Trust, Charity and NGOs: -Public as well as private, registered as well as unregistered trust will have to be classified in the special category.
4. Politically Exposed Person: - In case of PEPs, the account should be opened only after consent of the senior management and principal officer & all the required documents are collected and client should be marked as PEP in records. Where a client has been accepted and the client or beneficial owner is subsequently found to be, or subsequently becomes a PEP,

registered intermediaries shall obtain senior management approval to continue the business relationship.

CUSTOMER IDENTIFICATION POLICY

The following customer identification norms shall be adhered to in respect of all new clients to establish the identity of the client along with firm proof of address to prevent opening of account which is fictitious/benami/anonymous in nature.

SEBI/Stock Exchanges and other regulatory authorities under which Rajvi Stock Broking P. Limited is governed from time to time specify various KYC norms/ guidelines that have to be adhered to in order to be able to identify customers. Such norms and guidelines should be followed scrupulously at the time of customer acceptance. Further given below are list of Basic Requirements to be obtained from various types of clients at the time of account opening

PROOF IDENTITY:

- ❖ Passport
- ❖ Voter ID Card
- ❖ Driving license
- ❖ PAN card with photograph
- ❖ Unique Identification Number (UID) (Aadhar Card)
- ❖ Identity card/document with applicant's Photo, issued by a) Central/State Government and its Departments, b) Statutory/Regulatory Authorities, c) Public Sector Undertakings, d) Scheduled Commercial Banks, e) Public Financial Institutions, f) Colleges affiliated to Universities (this can be treated as valid only till the time the applicant is a student), g) Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members, and h) Credit cards/Debit cards issued by Banks.

PROOF OF ADDRESS

The address of the Client would be verified from one of the following:

- ❖ Ration card,
- ❖ Passport,
- ❖ Voter ID card,
- ❖ Driving license,
- ❖ Bank passbook / Bank Statement,
- ❖ Unique Identification Number (UID) (Aadhar Card)
- ❖ Verified copies of a) Electricity bills (not more than three months old), b) Residence Telephone bills (not more than three months old) and c) Leave and License agreement / Agreement for sale.
- ❖ Self-declaration by High Court & Supreme Court judges, giving the new address in respect of their own accounts.
- ❖ Identity card/document with address, issued by a) Central/State Government and its Departments, b) Statutory/Regulatory Authorities, c) Public Sector Undertakings, d) Scheduled Commercial Banks, e) Public Financial Institutions, f) Colleges affiliated to Universities (this can be treated as valid only till the time the applicant is a student) and g) Professional Bodies such as ICAI, ICWAI, Bar Council etc., to their Members.

As per SEBI circular **CIR/MIRSD/2/2013**, dated 24.01.2013, the beneficial owner has been defined as follows: the natural person or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a legal person or arrangement.

- Where the client is a company, partnership or unincorporated association/body of individuals, JSPL verify the identity of such persons, through the following information

-The identity of the natural person, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest.

Controlling ownership interest means ownership of/entitlement to:

- i. more than 25% of shares or capital or profits of the juridical person, where the juridical person is a company;
- ii. more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership; or
- iii. more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.

Where no natural person is identified, the identity of the relevant natural person who holds the position of senior managing official.

Where the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

The documents provided by the clients will be reviewed on a periodic basis, mostly yearly and will be updated as per the latest requirements and guidelines of the regulatory bodies.

SUSPICIOUS TRANSACTIONS IDENTIFICATION, MONITORING & REPORTING

ACFSL will monitor through the automated means of Back Office Software for unusual size, volume, pattern or type of transaction. For non-automated monitoring, the following kinds of activities are to be mentioned as Red Flags and reported to the Principal Officer.

- The customer exhibits unusual concern about the firm's compliance with government reporting requirements and the firm's AML policies (particularly concerning his or her identity, type of business and assets), or is reluctant or refuses to reveal any information concerning business activities, or furnishes unusual or suspicious identification or business documents.
- The customer wishes to engage in transactions that lack business sense or apparent investment strategy, or are inconsistent with the customer's stated business or investment strategy.
- The information provided by the customer that identifies a legitimate source for funds is false, misleading, or substantially incorrect.
- Upon request, the customer refuses to identify or fails to indicate any legitimate source for his or her funds and other assets.
- The customer (or a person publicly associated with the customer) has a questionable background or is the subject of news reports indicating possible criminal, civil or regulatory violations.
- The customer exhibits a lack of concern regarding risks, commissions, or other transaction costs.
- The customer appears to be acting as an agent for an undisclosed principal, but declines or is reluctant, without legitimate commercial reasons, to provide information or is otherwise evasive regarding that person or entity.

- The customer has difficulty describing the nature of his or her business or lacks general knowledge of his or her industry.
- The customer attempts to make frequent or large deposits of currency, insists on dealing only in cash, or asks for exemptions from the firm's policies relating to the deposit of cash.
- The customer engages in transactions involving cash or cash equivalents or other monetary instruments that appear to be structured to avoid the Rs.10,00,000 government reporting requirements, especially if the cash or monetary instruments are in an amount just below reporting or recording thresholds.
- For no apparent reason, the customer insists for multiple accounts under a single name or multiple names, with a large number of inter- account or third-party transfers.
- The customer engages in excessive journal entries between unrelated accounts without any apparent business purpose.
- The customer requests that a transaction be processed to avoid the firm's normal documentation requirements.
- The customer, for no apparent reason or in conjunction with other red flags, engages in transactions involving certain types of securities, such as Z group and T group stocks, which although legitimate, have been used in connection with fraudulent schemes and money laundering activity. (Such transactions may warrant further due diligence to ensure the legitimacy or the customer's activity.)
- The customer's account shows an unexplained high level of account activity.
- The customer maintains multiple accounts, or maintains accounts in the names of family members or corporate entities, for no apparent purpose.
- The customer's account has inflows of funds or other assets well beyond the known income or resources of the customer.

When a member of the firm detects any red flag he or she will escalate the same to the Principal Officer for further investigation. Broad categories of reason for suspicion and examples of suspicious transactions for an intermediary are indicated as under:

- 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 authorized signatory with no rationale.
 - Unexplained transfers between multiple accounts with no rationale
- Activity in Accounts
 - Unusual activity compared to past transactions

- Use of different accounts by client alternatively
- Sudden activity in dormant accounts
- Activity inconsistent with what would be expected from declared business
- Account used for circular trading
- Nature of Transactions
 - Unusual or unjustified complexity
 - No economic rationale or bonafide 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 transactions
- Value of Transactions
 - Value just under the reporting threshold amount in an apparent attempt to avoid reporting
 - Large sums being transferred from overseas for making payments inconsistent with the clients 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

RISK CATEGORIZATION

ACFSL shall categorize its clients into high medium, and low risk as per its categorization process and thereafter collect documents and other information from the clients based on the perceived risk in order to achieve the PMLA objective.

Clients should broadly be classified in the following categories

RISK	PARTICULARS
High Risk	Clients which are likely to pose a high risk to ACFSL, may be categorized as high risk. -Clients who have defaulted in the past, -Clients who have a suspicious background -HNIs whose identity and source of wealth are difficult to identify -Politically exposed persons ,-Clients of Special Category, -Dormant Account, -NRI
Medium Risk	Clients which are likely to pose a medium risk to ACFSL may be categorized as medium risk. They can be the following: -Where the client profile of the person opening the account is doubtful or dubious. -Where the trading and settlement pattern of the client is suspicious -Intraday clients or speculative client.
Low Risk	Clients who pose low or nil risk. -They are corporate/HNIs who have a respectable social and financial standing. -Clients who fulfill obligations on time.

Risk Category based on Nature of Business Activity, Trading Turnover etc:-

Risk Category	CM Segment	Derivatives Segment	Payment Mechanism
Low Risk	Average daily turnover < Rs. 50 Lacs or net settlement obligation < Rs. 5 Lacs	Average daily turnover < Rs. 100 Lacs	Regular payment through A/c payee cheque from the Bank A/c already mapped with us
Medium Risk	Average daily turnover > Rs. 50 Lacs but < Rs. 200 Lacs or net settlement obligation > Rs. 5	Average daily turnover > Rs. 100 lacs but < Rs. 500 Lacs	Payment through A/c payee cheque from the Bank A/c other than one already mapped with us
High Risk	HNI Clients having average daily turnover of > Rs. 200 Lacs or net settlement obligation of < Rs. 25 lacs	HNI Clients having average daily turnover of > Rs. 500 Lacs	Payment through Banker's Cheque / Demand Draft / NEFT / RTGS / Cash etc.

However, while carrying out transactions for/by the client, RMS Team / department should monitor the trading activity of the client and exercise due diligence to ensure that the trading activity of the client is not disproportionate to the financial status and the track record of the client and shall also take effective measures to mitigate the money laundering and terrorist financing risk with respect to all clients, countries or geographical areas, nature and volume of transactions etc. Accounts department should ensure that payment received from the client is being received in time and through the bank account the details of which are given by the client in KYC form or as may be registered with ACFSL and the payment through cash / bearer demand drafts should not be entertained. Further, proper records with audit trail including that of NEFT/RTGS/ECS and other payment modes as may be approved by RBI shall also be maintained and should be made available to competent authorities and self regulatory bodies as and when required.

Further as a part of DP related activities, ACFSL shall also monitor as under:

- (a) Details of Debits and Credits due to market, off-market or IDT Transfers involving 5000 or more shares in an account, in ISIN, in a single transaction or series of transactions executed during a fortnight.

- (b) Details of Debits and Credits transactions (subject to minimum 5000 shares) in securities debited in a single transaction or series of transaction executed during a fortnight in an account, in ISIN exceed 10 times the average size of the transaction. For this purpose, average shall be calculated over the total number of securities in all ISINs debited in account in the past 30 days.
- (c) Details of all transactions involving 5000 or more shares in an account, in ISIN, in a single transaction or series of transactions in respect of Demat, Remat, Corporate Actions and Pledges executed during a fortnight.
- (d) Dormant Account (means an account where no debit transaction in past one year) shall be subjected to two step verification. If required, necessary confirmation may be obtained from account holder.
- (e) Upon arriving at the conclusion of any transaction as suspicious transaction, the same shall be reported to FIU-Ind within prescribed time and all necessary records of such intimation shall be maintained and preserved for such period as may be prescribed.

Initial Risk categorization of all the clients would be done by ACFSL at the time of opening of the Client accounts, depending on the financials details/ net-worth declarations and KYC declaration so of the clients given by the clients at time of account opening and regular updates received from the clients and shall be reviewed on an ongoing basis.

Risk assessment of the clients registered and their trading pattern etc. are also done to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk with respect to its clients, countries or geographical areas, nature and volume of transactions, payment methods used by clients, etc. The risk assessment shall also take into account any country specific information that is circulated by the Government of India and SEBI from time to time, as well as, the updated list of individuals and entities who are subjected to sanction measures as required under the various United Nations' Security Council Resolutions.

MAINTENANCE OF RECORDS

The Principal Officer will be responsible for the maintenance for following records

- 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;
- All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place;
- 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

PRESERVANCE OF RECORDS

In terms of rules made under the PMLA Act, ACFSL shall maintain and preserve a record of:

- (a) All suspicious transactions whether or not made in cash **for a period of Five years**;
- (b) Identity and current address or addresses including permanent address or addresses of the Client, the nature of business of the Client and his financial status, account files, business correspondence and all other details as per PMLA guide line **for a**

period of Five years after the business relationship between client and intermediary has ended or the account has been closed whichever is later.

(c) Suspicious records along with the records of the identity of clients shall be maintained and preserved for a period of Five years or as may be in force from time to time from the date of cessation of the transaction between the Client and intermediaries

REPORTING (DISCLOSURE) OF SUSPICIOUS ACTIVITY

The 'Principal Officer' shall report the information relating to suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND) at the following address as may modify by the SEBI/Exchange from time to time:

Director, FIU-IND, Financial Intelligence Unit-India, 6th Floor, Hotel Samrat, Chanakyapuri, New Delhi – 110021

The reporting requirements and formats to be used are specified by FIU from time to time.

If any employee suspects or has reasonable ground to believe that a customer is involved in money laundering must promptly be reported to the Principal Officer.

It should be ensured that the money pertaining to suspicious trades should not be returned. However, the relevant authorities should be consulted in determining what action should be taken.

DUE DATE FOR REPORTING:

Cash Transaction Report: 15th Day of the Succeeding month

Suspicious Transaction Report: 7th Day of the succeeding month

Suspicious transaction means a transaction whether or not made in cash which, to a person acting in good faith –

- (a) Gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
- (b) Appears to be made in circumstances of unusual or unjustified complexity; or
- (c) Appears to have no economic rationale or bonafide purpose.

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.

No restrictions should be put on operations in the accounts where an STR has been made. All directors, officers and employees (permanent and temporary) are prohibited from disclosing ("tipping off") the fact that a STR or related information is being reported or provided to the FIU-IND.

STR Maintenance and Confidentiality

ACFSL will hold STRs and any supporting documentation confidential. We will not inform anyone outside of a law enforcement or regulatory agency or securities regulator about a STR. We will refuse any requests for STR information and immediately tell FIU IND of any such request we receive. We will segregate STR filings and copies of supporting documentation from other firm books and records to avoid disclosing STR filings. Our Principal Officer will handle all requests or other requests for STRs.

Freezing of Funds, Financial Assets or Economic Resources or Related Services

As per the Section 51A in The Unlawful Activities (Prevention) Act, 1967 and Order issued by the Central Government on 27.08.2009 thereunder, Central Government has power to

(a) freeze, seize or attach funds and other financial assets or economic resources held by, on behalf of or at the direction of the individuals or entities listed in the Schedule to the Order, or any other person engaged in or suspected to be engaged in terrorism;

(b) prohibit any individual or entity from making any funds, financial assets or economic resources or related services available for the benefit of the individuals or entities listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism;

(c) prevent the entry into or the transit through India of individuals listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism.

This obligations is on JSPL to ensure the effective and expeditious implementation of said Order

HIRING POLICIES AND TRAINING ON PREVENTION OF MONEY LAUNDERING

ACFSL has adequate screening procedures in place to ensure high standards when hiring employees. The company will identify properly the key position within their own organization structure having regard to the risk of money laundering and terrorist financing and size of their business. The senior management level has been entrusted with the responsibility of complying with the provisions of the ACT and reporting of the suspicious transactions, if any. The employees of the company has been briefed up and trained with the provisions and intentions of the Act putting stress to anti money laundering and anti- terrorist financing.

ACFSL shall provide anti-money laundering training to all its new employees at the time of joining the organization and updates would be provided on periodic basis initially quarterly / half yearly basis to its all employees. The training shall review applicable money laundering laws and recent trends in money laundering activities as well as the ACFSL's policies and procedures to combat money laundering, including how to recognize and report suspicious transactions.

INVESTORS EDUCATION:

Implementation of AML/CFT measures require member to demand certain information from investors which may be of personal nature or has hitherto never been called for. Such information can include documents evidencing source of funds/income tax returns/bank records etc. This can sometimes lead to raising of questions by the client with regard to the motive and purpose of collecting such information.

There is, therefore, a need for intermediaries to sensitize their clients about these requirements as the ones emanating from AML and CFT framework. ACFSL shall prepare specific literature/ pamphlets etc. so as to educate the client of the objectives of the AML/CFT program. ACFSL provides brief note on AML as a part of KYC documents as well as on web-site.

POLICY UPDATION

The policy will be reviewed and updated on a yearly basis by the management so as to update any policy level changes of the company and also, revised periodically to make it in line with the latest Rules, Regulations and Circulars & Guidelines of the SEBI, Exchanges and Depositories.

BOARD OF DIRECTORS APPROVAL

ACFSL has approved this AML program as reasonably designed to achieve and monitor our companies' ongoing compliance with the requirements of the PMLA and the implementing regulations under it.

MISCELLANEOUS

All employees shall ensure compliance with this policy. It shall be the duty of every Employee/ Business Associate of the ACFSL to cooperate with and provide timely disclosure and information to any inspecting authority (either internal or external) including any relevance law enforcement authorities with regard to implementation of this policy.

In addition to this policy all directives issued by SEBI / Exchanges or any other regulatory authority shall be strictly adhered to.

Policy on Sharing of Information for CDD and ML/TF Risk Management

Objective:

To ensure that customer, account, and transaction information is shared appropriately within the organization and across branches or subsidiaries for the purposes of Customer Due Diligence (CDD) and management of Money Laundering/Terrorist Financing (ML/TF) risks.

Policy Statement:

The Company shall establish and maintain effective policies and procedures to facilitate the sharing of information required for AML/CFT compliance, CDD, and ML/TF risk management purposes. This includes the sharing of relevant data and insights with group-level functions such as Compliance, Audit, and AML/CFT teams.

Scope:

This policy applies to all departments, branches, and subsidiaries of the Company operating under the same group structure, wherever applicable.

Key Provisions:

1. Information Sharing Framework:

- Information pertaining to customers, their accounts, and transactions may be shared among group entities, branches, or subsidiaries when required for AML/CFT purposes.
- Such sharing shall be done only through secure and authorized channels to ensure data integrity and confidentiality.

2. Authorization and Access Control:

- Only designated officers within the Compliance, AML/CFT, and Audit functions shall have access to shared information.
- Prior authorization from the Principal Officer/AML Head is required before sharing sensitive information externally within the group.

3. Confidentiality and Data Protection:

- Information shared shall be used solely for AML/CFT risk management and CDD purposes.
- All shared information must be handled in compliance with data protection laws and internal confidentiality requirements.

4. Record Maintenance:

- Records of information requests, approvals, and data shared must be maintained for a minimum period as prescribed under applicable regulations.

5. Periodic Review:

- The Compliance Department shall periodically review the effectiveness of information-sharing arrangements to ensure compliance with regulatory and group-level AML/CFT standards.

Responsibility:

The AML Compliance Officer and Group Compliance Head are responsible for ensuring that all information-sharing practices adhere to this policy and applicable AML/CFT regulations.

Place: Ahmedabad

Bord Approval Date: 30-05-2026,
FOR AMRAPALI CAPITAL AND FINANCE SERVICES LIMITED



Designation of the Issuing Authority:

(Compliance Officer / ~~Director~~ / ~~Proprietor~~ / ~~Partner~~ / ~~HR Manager~~)

Name: Nilesh Kapuriya