

# Motisons Shares Pvt. Ltd.

MEMBER - NSE, BSE, MCX'SX, NSE-CDS, USE, DP-CDSL

## Anti Money Laundering Measures

### Background:

The Prevention of Money Laundering Act, 2002 came into effect from 1<sup>st</sup> July 2005. Necessary Notifications / Rules under the said Act were published in the Gazette of India on 1<sup>st</sup> July 2005 by the Department of Revenue, Ministry of Finance, Government of India.

We M/s. **Motisons Shares Private Limited** being a Stock Broker and a Depository Participant have implemented various procedures and principals following the SEBI guidelines to fulfill the distinguished objectives of the PMLA.

### Objective:

Money laundering has now become one of the major concerns of international financial community. Money Laundering is not just an attempt to disguise money derived from illegal activities. Rather, money laundering is involvement in any transaction or series of transactions that seek to conceal or disguise the nature or source of proceeds derived from illegal activities, including drug trafficking, terrorism, organized crime, fraud and many other crimes.

The objective is to have a system in place for preventing any money laundering financial transaction through us and also to identify, monitor, report any such transaction to appropriate authorities.

"Know Your Customer" (KYC) is the guiding principle behind the Anti-Money Laundering (AML) measures. It incorporates the "Know Your Customer" Standards & "Anti Money Laundering" Measures, hereinafter to be referred as "KYC Standards" and "AML Measures". The objective of is to 'have in place adequate policies, practices and procedures that promote high ethical and professional standards and prevent the Company from being used, intentionally or unintentionally, by criminal elements'. KYC Standards and AML Measures would enable the Company to know / understand its customers, the beneficial owners, the principals behind customers who are acting as agents and their financial dealings better which in turn will help the Company to manage its risks prudently.

The management of the company is fully committed to establish appropriate policies and procedures for ensuring effectiveness and compliance with respect to all relevant legal requirements.

### The Regulatory / Statutory Requirements

An officer of the company will be designated as "Principal Officer" who will ensure proper discharge of all legal requirements with respect to the same. The Principal Officer will be responsible for:

- Defining MSPL's Anti Money Laundering Policy
- Ensuring compliance of MSPL's AML Policy
- Acting as a central reference point and playing an active role in identification & assessment of potentially suspicious transactions
- Ensuring that MSPL discharges its legal obligation to report suspicious transactions to the FIU.

For Motisons Shares Pvt. Ltd

  
Director/Authorized Signatory

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Phone : 0141-4085555, Fax : 0141-4085550

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Regd Office : 2nd Floor, Chandwani Smariti Bhawan, Jwalapur-Kankhal Main Road,

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CIN : U67120UR2005PTC000351



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- Ensuring that this policy is explained to all the concerned in the stock broking and DP Department of MSPL and give adequate training to all the concerned staff.
- Ensuring that this policy is reviewed and tested frequently for its effectiveness

## The main aspect of this policy is the Customer Due Diligence Process which means:

- Obtaining sufficient information about to the client in order to identify who is the actual beneficial owner of the securities or on whose behalf transaction is conducted.
- Verify the customer's identity using reliable, independent source document, data or information & third party reliances on KYC registering authorities, or agencies which are approved by regulatory authorities.
- Conduct ongoing due diligence and scrutiny of the account/client to ensure that the transaction conducted are consistent with the client's background/financial status, its activities and risk profile.
- Updation of client identity documents will be carried for the account where there is no trading in last one year i.e. disabled account at time of enablement. Where Accounts opened on reliance of third party, documents verification with the KYC authorities will be taken at least once in two years.

## Customer Due Diligence

- Policy for Acceptance of Clients
- Client Identification Procedure
- Suspicious Transactions identification & reporting

## Customer Acceptance Policy

- Each client should be met in person: Accept Clients whom we are able to meet personally. Either the client should visit the office/branch or concerned official may visit the client at his residence/office address to get the necessary documents filed in and signed. Preferably accept clients who live within the jurisdiction of the branch. As far as possible, ensure that the new client is introduced by an existing client.
- Accepts clients on whom we are able to apply appropriate KYC procedures: Obtain completes information from the client. It should be ensured that the initial forms taken by the clients are filled in completely. All photocopies submitted by the client are checked against original documents without any exception. Ensure that the 'Know Your Client' guidelines are followed without any exception. All supporting documents as specified by Securities and Exchange Board of India (SEBI) and Exchanges are obtained and verified.
- Do not accept clients with identity matching persons known to have criminal background: Check whether the client's identify matches with any person having known criminal background or is not banned in any other manner, whether in terms of criminal or civil proceedings by any enforcement/regulatory agency worldwide.

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- Be careful while accepting Clients of Special category: We should be careful while accepting clients of special category like NRIs, HNIs, Trust, Charities, NGOs, Politically Exposed Persons (PEP), persons of foreign origin, companies having closed share holding/ownership, companies dealing in foreign currency, shell companies, overseas entities, clients in high risk countries, non face to face clients, clients with dubious background. Current/Former Head of State, Current/Former senior high profile politician, Companies offering foreign exchange, etc.) or clients from high-risk countries (like Pakistan, Afghanistan, etc.) or clients belonging to countries where corruption/fraud level is high (like Nigeria, Burma, etc). Scrutinize Innately the records / documents pertaining to clients belonging to aforesaid category.

The dealing staff must obtain senior management's prior approval for establishing business relationships with Politically Exposed Persons. In case an existing customer is subsequently found to be, or subsequently becomes a PEP, dealing staff must obtain senior management's approval to continue the business relationship.

- Guidelines on Identification of Beneficial Ownership: For non- individual customers as part of the due diligence measures sufficient information must be obtained in order to identify persons who beneficially own or control securities account. Whenever it is apparent that the securities acquired or maintained through an account are beneficially owned by a party other than the client, that party should be identified and verified using client identification and verification procedures as early as possible. The beneficial owner is the natural person or persons who ultimately own, control, or influence a client and/or persons on whose behalf a transaction(s) is/are being conducted. It includes persons who exercise ultimate effective control over a legal person or arrangement.
- Do not accept client registration forms which are suspected to be fictitious: Ensure that no account is being opened in a fictitious / benami name or on an anonymous basis.
- Do not compromise on submission of mandatory information/ documents: Client's account should be opened only on receipt of mandatory information along with authentic supporting documents as per the regulatory guidelines. Do not open the accounts where the client refuses to provide information/documents and we should have sufficient reason to reject the client towards this reluctance.

## Client Identification Procedure:-

To have a mechanism in place to establish identity of the client along with firm proof of address to prevent opening of any account which is fictitious / benami / anonymous in nature.

**Documents to be obtained as part of customer identification procedure for new clients:**

- In case of individuals, copy of the documents Pan Card, address proof, & identity proof etc. have to be obtained:
- In case of corporates, one certified copy of the following documents must be obtained:
  - Copy of the Registration/Incorporation Certificate
  - Copy of the Memorandum & Articles of the Association
  - Copy of the PAN card and the Director Index No. (DIN)
  - Copy of the latest audited Annual Statements of the corporate client

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- Latest Net worth Certificate
  - Latest Income Tax return filed.
  - Board Resolution for appointment of the Authorized Person who will operate the account.
  - Proof of address and identity of Authorized Person
- In case of partnership firm one certified copy of the following must be obtained:
- Registration certificate
  - Partnership Deed
  - PAN card of partners
  - Authorization letter for the person authorized to open and operate the account
  - Proof of identity and address of the authorized person.
  - Annual statement/returns of the partnership firm
- In case of a Trust, one certified copy of the following must be obtained:
- Registration certificate
  - Trust Deed
  - PAN card
  - Authorization letter for the entity authorized to act on their behalf
  - Officially valid documents like PAN card, voters ID, passport, etc of person(s) authorized to transact on behalf of the Trust.
- In case of unincorporated association or a body of individuals, one certified copy of the following must be obtained:
- Resolution of the managing body of such association or body of individuals
  - POA in favor of person authorized to transact
  - Officially valid documents like PAN card, voters ID, passport, etc of the person(s) authorized to transact.
  - Any document required by ..... establish the legal existence of such an association or body of individuals.
- In case of an NRI account Repatriable/nonrepatriable, the following documents are required:
- Copy of the PIS permission issued by the bank
  - Copy of the passport
  - Copy of PAN card
  - Proof of overseas address and Indian address
  - Copy of the bank statement
  - Copy of the demat statement
  - If the account is handled through a mandate holder, copy of the valid PoA/mandate

## General Guidelines

- Obtaining sufficient information in order to identify persons who beneficially own or control securities account. Whenever it is apparent that the securities acquired or maintained through an account are beneficially owned by a party other than the client, that party should be identified

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using client identification and verification procedures. The beneficial owner is the natural person or persons who ultimately own, control or influence a client and / or persons on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person or arrangement.

- Collect all the possible supporting documents to identify the customer and verify the customer's identity using reliable, independent source documents, data or information.
- Collecting the documents which support the corresponding address as well as permanent address of the client.
- Fulfill the entire requirement for establishing the financial status of the client as stipulated by the concerning authority.
- Ensure that all the relevant data of the client is clearly and completely entered in the records and all these should be done under the supervision of senior official of the concerning department.
- Necessary checks and balance to be put into place before opening an account so as to ensure that the identity of the client does not match with any person having known criminal background or is not banned in any other manner whether in terms of criminal or civil proceedings by any enforcement agency worldwide.
- If there is any request for the modification of the records, it should be through an application duly signed by the said client and should be forwarded personally or by a faithful person authorized by him.
- We ensure that an account is not opened where we are unable to apply appropriate clients due diligence measures/ KYC policies.
- We shall not continue to do business with such a person and file a suspicious determining in whether to freeze or close the account.
- We ensure the circumstances under which the client is permitted to act on behalf of another person / entity should be clearly laid down. It should be specified in what manner the account authority required for transactions exceeding a specified quantity / value and other appropriate details. Adequate verification of a person's authority to act on behalf of the customer should also be carried out.

## Nature of business activity of the client

- We insist the client to put necessary checks and balance in place before opening an account so as to ensure that the identity of the client does not match with any person having known criminal background.
- We Monitor the manner of making payment for transactions undertaken.
- We always take care of parameters that should enable classification of clients into low, medium and high risk. KYC norms of such clients are updated on a regular basis.

## Risk Profiling of the Client

In order to achieve this objective each client will be marked into 3 categories, High Risk, Medium Risk and Low Risk.

**Low Risk:** - Clients are those pose low or nil risk. They are good corporate/HNIs who have a respectable social and financial standing. These are the clients who make payment on time and take delivery of shares.

**Medium Risk:** - Clients are those who are intra-day clients or speculative clients. These are the clients who maintain running account with MSPL.

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High risk :- Clients are those who have defaulted in the past, have suspicious background, do not have any financial status, etc. Clients of special category who have access to /or have foreign exposure whether with high risk countries or not.

\* High risk clients Account will be opened only after obtaining senior management approval.

## Client Categorization

The categorization will be made based on the following parameters/ factors of risk perception:


- Non resident clients.
- High net worth clients.
- Trust, Charities, NGOs and organisations receiving donations.
- Companies having close family shareholdings or beneficial ownership.
- Politically exposed persons (PEP) of foreign origin.
- Current / Former Head of State, Current or Former Senior High profile politicians and connected persons (immediate family. Close advisors and politicians and companies in which such individuals have interest or significant influence)
- Companies offering foreign exchange offerings
- Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect, where there is unusual banking secrecy, Countries active in narcotics production, Countries where corruption (as per Transparency International Corruption Perception index) is highly prevalent, Countries against which government sanctions are applied, Countries reputed to be any of the following – Havens / sponsors of international terrorism, offshore financial centers tax havens, countries where fraud is highly prevalent.
- Non face to face clients.
- Clients with dubious reputation as per public information available etc.

The clients will be placed under low, medium and high-risk category based on their turnover per day. Corporates / HNIs having respectable social and financial standing, Clients who make payment on time and take delivery of shares can be considered as Low Risk clients. Intra-day clients or speculative clients whose turnover is not in line with the Financials declared are considered as Medium Risk clients. Clients doing large activity in dormant account, trading on a regular basis in illiquid scrips in large volume and quantity, those who have defaulted in the past and have suspicious background are to be considered as High risk clients.

## Freezing of Accounts:

- a. If the account is not being operated for more than one year we may Temporarily freeze the account and the freed account will be in operation only after taking bonafides of the client.
- b. Account will be freezed if any communication from regulatory authority is received debaring the client
- c. Account will be freezed if any suspicion comes regarding bonafides of the client; nature of business of the client till the suspicion is cleared.

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## Internal Mechanism for identification Suspicious Transactions

The Company has taken all steps to prevent the money laundering and terrorist financing by

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following the rules procedures as mentioned in the PMLA 2005 and ensure the strict compliances of the same. Regular monitoring of transactions is vital for ensuring effectiveness of the Anti Money laundering procedures:

- There is a system in place for monitoring and reporting suspicious transaction (STR). First of all we try for understanding of the normal activity of the client so as to identify the deviant transaction/ activities if any occur in the business relation with the client.
- We ensure to take appropriate steps to enable suspicious transactions to be recognized and have appropriate procedures for reporting suspicious transactions.
- We have taken utmost care to all complex, unusually large transactions / patterns which appear to have no economic purpose.
- We specify internal threshold limits for trade exposure for each class of client accounts and pay special attention to the transaction which exceeds these limits for trade/ exposure.
- All the cash transaction which is valued 10 lacs or its equivalent in foreign currency are thoroughly checked.
- We ensure that all customer and transaction records and information are available on a timely basis to the competent investigating authorities at the time of audit.
- Verify the identity of the beneficial owner of the customer and/or the person on whose behalf a transaction is being conducted, corroborating the information provided in relation to conduct ongoing due diligence and scrutiny, i.e. perform ongoing scrutiny of the transaction and account throughout the course of the business relationship to ensure that the transaction being, conducted are consistent with the company's records.
- Keep a record of the client who have transacted such and intimated the same to the client.
- Suspicious transactions should also be regularly reported to the higher authorities / head of the department.
- Further the senior official of the company randomly examine a selection of transaction of transaction undertaken by clients to comment on their nature i.e. whether they are in the suspicious transactions or not.
- Should there be any suspected drug related or other laundered money or terrorist property, the competent investigating authorities would need to trace through the audit trail for reconstruction of a financial profile of the suspect account.
- There is a the entities or individuals included system in place of continuous scanning of all existing accounts to ensure that no account is held by or linked to any of in the list published by UN on <http://www.un.org/sc/committees/1267/consolist.shtml> and <http://www.un.org/sc/committees/1988/list.shtml>.

To enable this reconstruction, we are retaining the following information for the accounts of their customers in order to maintain a satisfactory audit trail:

- The beneficial owner of the account,
- The form in which the funds were offered or withdrawn. E.g. cash, cheques, etc.
- The identity of the person undertaking the transaction,
- The form of instruction and authority.

More specifically, we shall put in place a system of maintaining proper record of transactions prescribed under Rule 3, notified under the Prevention of Money Laundering Rules (PMLR), 2005 as mentioned below:

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- All cash transactions of the value of more than rupees ten lakh or its equivalent in foreign currency
- All series of cash transactions integrally connected to each other which have been valued below rupees ten lakh or its equivalent in foreign currency where such series of transactions have taken place within a month the aggregate value of such transactions exceeds rupees ten lakh.
- All cash transactions were 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.

## Information to be maintained

We are maintaining and preserving for the period of 10 years, the following information in respect of transactions referred to in Rule 3 of Prevention of Money Laundering Rules (PMLR), 2005:

- the nature of the transactions;
- the amount of the transactions and the currency in which it is denominated;
- the date on which the transaction was conducted; and
- the parties to the transaction.

## Suspicious Transaction Monitoring & Reporting

We are extremely monitoring the:

- Client whose identification verification seems difficult or clients appear not to cooperate.
- Substantial increase in activity without any apparent cause.  
Large number of accounts having common parameters such as common partners / directors / promoters / address / email addresses / telephone numbers / introducers or authorized signatories.
- Transactions with no apparent economic or business rationale.
- Sudden activity in dormant accounts.
- Source of funds are doubtful or inconsistency in payment pattern.
- Unusual and large cash deposit made by an individual or business.
- Transfer of investment proceeds to apparently unrelated third parties.
- Multiple transactions of value just below the threshold limit specified in PMLA so as to avoid possible reporting.
- Unusual transactions by CSCs and businesses undertaken by shell corporations, off shore banks/financial services, business reported to be in the nature of export-import of small items.
- Asset management services for clients where the source of the funds is not clear or not in keeping with the clients apparent standing/business activity.
- Clients in high risk jurisdictions or clients introduced by banks or affiliates or other clients based in high risk jurisdictions.
- Clients transferring large sums of money to or from overseas locations with instructions for payment in cash.
- Purchases made on own account transferred to a third party through off-market transactions through DP accounts.

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- Suspicious off-market transactions.
- Large deals at prices away from the market.
- Accounts used as "pass through" where no transfer of ownership of securities or trading is accruing in the account and the account is being used only for funds transfers/layering purposes.
- Trading activity in accounts of high risk clients based on their profile, business pattern and industry segment.
- If the single transaction is exceeding Rs. 50 Lakh, permission from Compliance Officer is required.
- Clients who do not trade for 6 months becomes inactive and if that client trades for amount more than Rs. 25 Lakh then the permission from Compliance Officer is required.

Apart from the above measures, we take special care in case of transactions related to **Depository Division** such as:

- If instruction to transfer the securities is received from an inactive beneficiary owner or the BO not traded for a long time, verification or confirmation from the concerned client is required.
- All transactions should be verified according to the transaction value through maker and checker principal, which means for each transaction, there must be at least two individuals necessary for its completion and while one individual (maker) may create a transaction, the other individual (checker) should be involved in the confirmation or the authorization of the same. This ensures the strict control over the system.
- All off market transactions i.e. between two parties without the involvement of any clearing corporation or a stock exchange should be duly confirmed by the concerned clients.

Considering SEBI guideline (Issued vide circular no ISD//CIR/RR/AML/2/06 dated March 20, 2006) on "Prevention of Money Laundering Act, 2002, Obligations of intermediaries" we decide to follow procedure as mentioned below:

To designate an officer as 'Principal Officer' and intimate their details to the Financial Intelligence Unit, India on an immediate basis.

Guidelines / policy are framed considering the provisions of PMLA, 2002 and the Rules notified there under to preserve and report of certain transactions and also to take all steps considered necessary to ensure compliance with the requirements of section 12 of the Act.

## Other Important Points

- Reasons for treating any transaction or a series of transactions as suspicious should be recorded. It should be ensured that there is no undue delay in arriving at such a conclusion.
- Utmost confidentiality should be maintained in submitting the information.
- The reports may be transmitted by email/speed/registered post/fax at the Head Office addressed to the Principal Officer.
- No restriction may be put on operations in the accounts where a Suspicious Transaction Report has been made.
- It should be ensured that there is no tipping off to the client at any level.
- On the annual basis DP Will be update Documents, Data & Information of all clients and beneficial owners collected under the CDD process.

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## Reporting to Financial Intelligence Unit-India:

In terms of the PMLA rules, we are required to report information relating to suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND) at the following address:

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

We should not put any restrictions on operations in the accounts where an STR has been made. Further, it will be ensured that there is no tipping off to the client at any level.

## Employee's Hiring/ Training/ Investor Education

1. While appointing an employee, Screening will be done on (a) family background (b) Educational Qualification (c) Intelligence & capability to handle the work assigned.
2. At present In person training is imparted to the staff relating to the work assigned to him & the Aspects of AML/CFT policy related to his work..
3. At the time of accepting investor as a client, he will be briefed regarding AML\CFT policies. And to be informed regarding calling of his personal information like source of funds\security , supported by the documentary evidences like Income Tax Returns, Bank, Depository Transactions etc.

## Employees' Training

We have policy for ongoing employee training programme so that the total staffs of our company completely aware of the provisions of AML and CFT procedures and amendments thereof. These training programmes are totally focused for frontline staff, back office staff, compliance staff, risk management staff and staff dealing with new customers as it is very crucial that all those concerned fully understand the rationale behind these guidelines, obligations and requirements, implement them consistently and are sensitive to the risks of their systems being misused by unscrupulous elements, if there is any lapse on the part of any staffs of the company.

## Sub broker/ and clients Education

To implement AML/CFT provisions in true sense there is need to get certain information from investors which may be of personal nature or which have hitherto never been called for. Such information can include documents evidencing source of funds/income tax returns / bank records etc. To satisfy the investors on these aspects so that they can easily provide the information to us we have made them aware of PMLA provisions by way of literature formulated by us for all the Sub brokers/end clients.

A register of attendance of participation in such Education/ training program is maintained for the employees and the sub brokers, kept secured with the Compliance Department.

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As resolved Motisons Shares Private Limited shall take adequate measures as per its internal policy to prevent money laundering and shall also put in place a frame work for PMLA policy. The policies and procedures as mentioned above shall not be final as it may adopt additional measures to safeguard its interest with respect to activities associated with PMLA.

## Record keeping requirements:

"Records evidencing the identity of its 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 MSPL has ended or the account has been closed, whichever is later."

## Reporting to Financial Intelligence Unit-India

We shall report to:

Director, FIU-IND,  
Financial Intelligence Unit-India,  
6th Floor, Hotel Samrat,  
Chanakyapuri,  
New Delhi-110021.  
Website: <http://fiuindia.gov.in>

We carefully go through all the reporting requirement and formats as mentioned in your circulars; also we are adhering to the following:

- a) The cash transaction report (CTR) (wherever applicable) for each month to be submitted to FIU-IND by 15th of the succeeding month.
- b) The Suspicious Transaction Report (STR) to be submitted within 7 days of arriving at a conclusion that any transaction, whether cash or non-cash, or a series of transactions integrally connected are of suspicious nature. The Principal Officer should record his reasons for treating any transaction or a series of transaction as suspicious. It should be ensured that there is no undue delay in arriving at such a conclusion.
- c) The Principal Officer will be responsible for timely submission of CTR and STR to FIU-IND.
- d) Utmost confidentiality should be maintained in filling of CTR and STR to FIU-IND. The reports may be transmitted by speed/registered post/fax at the notified address.
- e) No nil reporting needs to be made to FIU-IND in case there are no cash/suspicious transactions to be reported.

We will intimate about appointment of Designated Director and Principal Officer to the Financial Intelligence Unit, India and further any changes and appointment Designated Director and Principal Officer will be again intimate to FIU.

We do not put any restrictions on operations in the account where an STR has been made. Our directors, officers and employee (permanently 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. Thus, it should be ensured that there is no tipping off to the client at any level.

For Motisons Shares Pvt. Ltd



Director/Authorized Signatory

Corporate Office : "Motisons Tower" 5th Floor, SB-110, Lal Kothi, Tonk Road, Jaipur - 302015

Phone : 0141-4085555, Fax : 0141-4085550

Email : [equity@motisons.com](mailto:equity@motisons.com) Web : [www.motisonsshare.com](http://www.motisonsshare.com)

Regd Office : 2nd Floor, Chandwani Smariti Bhawan, Jwalapur-Kankhal Main Road,

Haridwar-249403 (Uttarakhand)

CIN : U67120UR2005PTC000351



# Motisons Shares Pvt. Ltd.

MEMBER - NSE, BSE, MCX'SX, NSE-CDS, BSE-CDS, USE, DP-CDSL

## Designated Principal Officer

In case any further information/clarification is required in this regard, the 'Principal Officer' may be contacted.

**Mr. Atul Kumar Sogani**  
Motisons Shares Pvt. Ltd.  
"Motisons Tower" SB-110, 5th Floor,  
Lal Kothi, Tonk Road, Jaipur  
Tel: 0141-4085555  
Email: [equity@motisons.com](mailto:equity@motisons.com)

**REVIEW OF POLICY:** Policy will be reviewed as and when required due to change in PMLA guidelines and on Annual Basis.

For Motisons Shares Pvt, Ltd

  
Director/Authorized Signatory



**Corporate Office :** "Motisons Tower" 5th Floor, SB-110, Lal Kothi, Tonk Road, Jaipur - 302015

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