

Table of Contents

Section 1: Overview

- 1.1. Introduction
- 1.2. Background
- 1.3. Policies and Procedures to Combat Money Laundering and Terrorist financing

Section 2: Detailed Directives

- 2.1. Written Anti Money Laundering Procedures
- 2.2. Client Due Diligence (CDD)
- 2.3. Record Keeping
- 2.4. Information to be maintained
- 2.5. Retention of Records
- 2.6. Monitoring of transactions
- 2.7. Suspicious Transaction Monitoring and Reporting
- 2.8. List of Designated Individuals/ Entities
- 2.9. Procedure for freezing of funds, financial assets or economic resources or related services
- 2.10. Reporting to Financial Intelligence Unit-India
- 2.11. Designation of officers for ensuring compliance with provisions of PMLA
- 2.12. Employees' Hiring/Employee's Training/ Investor Education

SCHEDULE I

List of key circulars/ directives issued with regard to KYC, CDD, AML and CFT

ANNEXURES

Annexure 1: Government order dated August 27, 2009

Annexure 2: Government order dated March 14, 2019

Section 1: Overview

1.1. Introduction

1.1.1 The Directives as outlined below provide a general background and summary of the main provisions of the applicable anti-money laundering and anti-terrorist financing legislations in India. They also provide guidance on the practical implications of the Prevention of Money Laundering Act, 2002 (**PMLA**). The Directives also set out the steps that **BNK Securities Pvt. Ltd. (BNK)** or its representatives shall implement to discourage and to identify any money laundering or terrorist financing activities. The relevance and usefulness of these Directives will be kept under review and it may be necessary to issue amendments from time to time.

1.1.2 These Directives are intended for use primarily by intermediaries registered under Section 12 of the Securities and Exchange Board of India Act, 1992 (**SEBI Act**). While it is recognized that a “one- size-fits-all” approach may not be appropriate for the securities industry in India, each registered intermediary shall consider the specific nature of its business, organizational structure, type of clients and transactions, etc. when implementing the suggested measures and procedures to ensure that they are effectively applied. The overriding principle is that they shall be able to satisfy themselves that the measures taken by them are adequate, appropriate and abide by the spirit of such measures and the requirements as enshrined in the PMLA. BNK follows these directives to the best of its ability looking to the size of its operation and reviews them from time to time, so that it is effective and matches to the scale of its operations.

1.2. Background

1.2.1 The PMLA came into effect from 1st July 2005. Necessary Notifications / Rules under the said Act were published in the Gazette of India on 1st July, 2005 by the Department of Revenue, Ministry of Finance, Government of India. The PMLA has been further amended vide notification dated March 6, 2009 and inter alia provides that violating the prohibitions on manipulative and deceptive devices, insider trading and substantial acquisition of securities or control as prescribed in Section 12 A read with Section 24 of the Securities and Exchange Board of India Act, 1992 (SEBI Act) will now be treated as a scheduled offence under schedule B of the PMLA.

1.2.2 As per the provisions of the 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 stock-broker, sub-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 SEBI Act , shall have to maintain a record of all the transactions; the nature and value of which has been prescribed in the Rules under the PMLA. Such transactions include;

- i. All cash transactions of the value of more than ` 10 lakh or its equivalent in foreign currency.
- ii. All series of cash transactions integrally connected to each other which have been valued below ` 10 lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds an amount of ten lakh rupees or its equivalent in foreign currency
- iii. All suspicious transactions whether or not made in cash and including, inter-alia, credits or debits into from any non-monetary account such as demat account, security account maintained by the registered intermediary.

1.2.3 It may, however, be clarified that for the purpose of suspicious transactions reporting, apart from 'transactions integrally connected', 'transactions remotely connected or related' shall also be considered. In case there is a variance in CDD/AML standards prescribed by SEBI and the regulators of the host country, branches/overseas subsidiaries of BNK shall adopt to the more stringent requirements of the two.

1.3. Policies and Procedures to Combat Money Laundering and Terrorist financing

1.3.1 Essential Principles:

1.3.1.1 These Directives have taken into account the requirements of the PMLA as applicable to the intermediaries registered under Section 12 of the SEBI Act. The detailed Directives in Section II have outlined relevant measures and procedures to guide the registered intermediaries in preventing ML and TF. Some of these suggested measures and procedures may not be applicable in every circumstance. BNK shall consider carefully the specific nature of its business, organizational structure, type of client and transaction, etc. to satisfy itself that the measures taken by it are adequate and appropriate and follow the spirit of the suggested measures in Section II and the requirements as laid down in the PMLA.

1.3.2 Obligation to establish policies and procedures:

1.3.2.1 Global measures taken to combat drug trafficking, terrorism and other organized and serious crimes have all emphasized the need for financial institutions, including securities market intermediaries, to establish internal procedures that effectively serve to prevent and impede money laundering and terrorist financing. BNK has tried to follow the global measures as applicable to it keeping in mind the size of organization and its operation. The PMLA is in line with these measures and mandates that BNK ensures the fulfillment of the aforementioned obligations.

1.3.2.2 To be in compliance with these obligations, the senior management of BNK shall be fully committed to establishing appropriate policies and procedures for the prevention of ML and TF and ensuring their effectiveness and compliance with all relevant legal and regulatory requirements. BNK shall:

- a) issue a statement of policies and procedures, on a group basis where applicable, for dealing with ML and TF reflecting the current statutory and regulatory requirements
- b) ensure that the content of these Directives are understood by all staff members

- c) regularly review the policies and procedures on the prevention of ML and TF to ensure their effectiveness. Further, in order to ensure the effectiveness of policies and procedures, the person doing such a review shall be different from the one who has framed such policies and procedures
- d) adopt client acceptance policies and procedures which are sensitive to the risk of ML and TF
- e) undertake client due diligence (“**CDD**”) measures to an extent that is sensitive to the risk of ML and TF depending on the type of client, business relationship or transaction
- f) have in system a place for identifying, monitoring and reporting suspected ML or TF transactions to the law enforcement authorities; and
- g) develop staff members’ awareness and vigilance to guard against ML and TF

1.3.2.3 Policies and procedures to combat ML covers:

- a) Communication of group policies relating to prevention of ML and TF to all management and relevant staff that handle account information, securities transactions, money and client records etc. whether in branches, departments or subsidiaries;
- b) Client acceptance policy and client due diligence measures, including requirements for proper identification;
- c) Maintenance of records;
- d) Compliance with relevant statutory and regulatory requirements;
- e) Co-operation with the relevant law enforcement authorities, including the timely disclosure of information; and
- f) Role of internal audit or compliance function to ensure compliance with the policies, procedures, and controls relating to the prevention of ML and TF, including the testing of the system for detecting suspected money laundering transactions, evaluating and checking the adequacy of exception reports generated on large and/or irregular transactions, the quality of reporting of suspicious transactions and the level of awareness of front line staff, of their responsibilities in this regard. The internal audit



www.bnkcapital.com

BNK SECURITIES PVT LTD

CIN No. U67120WB1995PTC071182

PMLA POLICY

function shall be independent, adequately resourced and commensurate with the size of the business and operations, organization structure, number of clients and other such factors

Section 2: Detailed Directives

2.1. Written Anti Money Laundering Procedures

2.1.1 BNK has adopted written procedures to implement the anti- money laundering provisions as envisaged under the PMLA. Such procedures shall include inter alia, the following three specific parameters which are related to the overall '**Client Due Diligence Process**':

- a) Policy for acceptance of clients
- b) Procedure for identifying the clients
- c) Transaction monitoring and reporting especially Suspicious Transactions Reporting (STR).

2.2. Client Due Diligence (CDD)

2.2.1 The CDD measures comprise the following:

- a) Obtaining sufficient information in order to identify persons who beneficially own or control the 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 shall be identified 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
- b) Verify the client's identity using reliable, independent source documents, data or information
- c) Identify beneficial ownership and control, i.e. determine which individual(s) ultimately own(s) or control(s) the client and/or the person on whose behalf a transaction is being conducted -

i. **¹For clients other than individuals or trusts:** Where the client is a person other than an individual or trust, viz., company, partnership or unincorporated association/body of individuals, the intermediary shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the following information:

a) 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.

Explanation: 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.

b) In cases where there exists doubt under clause (aa) above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity of the natural person exercising control over the juridical person through other means.

Explanation: Control through other means can be exercised through voting rights, agreement, arrangements or in any other manner.

¹CIR/ MIRSD/2/ 2013 dated January 24, 2013

- c) Where no natural person is identified under clauses (aa) or (bb) above, the identity of the relevant natural person who holds the position of senior managing official.
- ii. **For client which is a trust:** Where the client is a trust, the intermediary shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the identity of the settler of the trust, the trustee, the protector, the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.
- iii. **Exemption in case of listed companies:** 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.
- iv. **Applicability for foreign investors:** BNK, when dealing with foreign investors' is guided by the clarifications issued vide SEBI circulars [CIR/MIRSD/11/2012](#) dated September 5, 2012 and [CIR/ MIRSD/ 07/ 2013](#) dated September 12, 2013, for the purpose of identification of beneficial ownership of the client.
- d) Verify the identity of the beneficial owner of the client and/or the person on whose behalf a transaction is being conducted, corroborating the information provided in relation to (c).
- e) Understand the ownership and control structure of the client. .

- f) Conduct ongoing due diligence and scrutiny, i.e. Perform ongoing scrutiny of the transactions and account throughout the course of the business relationship to ensure that the transactions being conducted are consistent with the registered intermediary's knowledge of the client, its business and risk profile, taking into account, where necessary, the client's source of funds; and
- g) Registered intermediaries shall periodically update all documents, data or information of all clients and beneficial owners collected under the CDD process.

2.2.2 Policy for acceptance of clients:

2.2.2.1 BNK has client acceptance policies and procedures that aim to identify the types of clients that are likely to pose a higher than average risk of ML or TF. By establishing such policies and procedures, it will be in a better position to apply client due diligence on a risk sensitive basis depending on the type of client business relationship or transaction. In a nutshell, the following safeguards are to be followed while accepting the clients:

- a) No account is opened in a fictitious / benami name or on an anonymous basis.
- b) Factors of risk perception (in terms of monitoring suspicious transactions) of the client are clearly defined having regard to clients' location (registered office address, correspondence addresses and other addresses if applicable), nature of business activity, trading turnover etc. and manner of making payment for transactions undertaken. The parameters shall enable classification of clients into low, medium and high risk. Clients of special category (as given below) may, if necessary, be classified even higher. Such clients require higher degree of due diligence and regular update of Know Your Client (**KYC**) profile.
- c) Documentation requirements and other information to be collected in respect of different classes of clients depending on the perceived risk and having regard to the requirements of Rule 9 of the PML Rules, Directives and Circulars issued by SEBI from time to time.

- d) Ensure that an account is not opened where the intermediary is unable to apply appropriate CDD measures/ KYC policies. This shall apply in cases where it is not possible to ascertain the identity of the client, or the information provided to the intermediary is suspected to be non - genuine, or there is perceived non - co-operation of the client in providing full and complete information. BNK shall discontinue to do business with such a person and file a suspicious activity report. It shall also evaluate whether there is suspicious trading in determining whether to freeze or close the account. BNK shall be cautious to ensure that it does not return securities of money that may be from suspicious trades. However, BNK shall consult the relevant authorities, such as SEBI / Depository / Exchange and other regulators in determining what action it shall take when it suspects suspicious trading.
- e) BNK has decided to develop customer acceptance policies and procedures that aim to identify the types of customers that are likely to pose a higher than the average risk of money laundering or terrorist financing. By establishing such policies and procedures, it is in a better position to apply customer due diligence on a risk sensitive basis depending on the type of customer business relationship or transaction. The following safeguards are implemented / take No account is opened in a fictitious / benami name or on an anonymous basis.
- f) Factors of risk perception (in terms of monitoring suspicious transactions) of the client are clearly defined having regard to clients' location (registered office address, correspondence addresses and other addresses if applicable), nature of business activity, trading turnover etc. and manner of making payment for transactions undertaken.
- g) The parameters should enable classification of clients into low, medium and high risk. Clients of special category (as given below) will be entertained only by the directors and no other employee will have right to register them without approval from the directors.
- h) No client will be registered till all requisite documentation requirements and other information to be collected in respect of different classes of

clients depending on perceived risk and having regard to the requirement to the Prevention of Money Laundering Act 2002, guidelines issued by RBI and SEBI from time to time.

- i) No account will be opened where it is not possible to apply appropriate clients due diligence measures / KYC policies like actual identity of the client, information provided to the company is suspected to be non genuine, perceived non co-operation of the client in providing full and complete information.
- j) The employees are also advised to stop business with such a person and file a suspicious activity report to the senior management. Management is also required to evaluate whether there is suspicious trading in determining whether to freeze or close the account. The managers are also asked to be cautious to ensure that it does not return securities of money that may be from suspicious trades.

Management is informed to consult the relevant authorities (NSE/SEBI/Depository) in determining what action it should take when it suspects suspicious trading. Under no circumstances the clients are permitted to act on behalf of another person / entity. Compliance Officer is directed to ensure that guideline for all client account other than ordered specifically by the directors should be followed in the manner in which they should be operated, transaction limits for the operation, additional authority required for transactions exceeding a specified quantity / value and other appropriate details fixed.

Dealer executing the order/ transaction is required to verify the person's authority to act on behalf the customer should also be carried out at the time of receiving order.

Dealer under which client will be placing his order is instructed to put necessary checks and balance before executing orders.

- n) Compliance officer is instructed to carry out necessary checks and balance 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.
- o) The CDD process shall necessarily be revisited when there are suspicions of money laundering or financing of terrorism (ML/FT)

2.2.3 Risk-based Approach:

2.2.3.1 The BNK has decided to follow risk based approach to its client by categorizing its client into three categories of 'Low', 'Medium' and 'High' risk client depending on circumstances such as the customer's background, type of business relationship or transaction etc. and period for which amount is due from the client. BNK has authorized compliance officer to apply each of the customer due diligence measures on a risk sensitive basis and report all serious flow to the Principal Officer. A monthly analysis of client fund position (debtors/creditors) along with volume of transactions is implemented to ensure proper implementation of the policy by the compliance officer. In line with the risk-based approach, the type and amount of identification information and documents that BNK shall obtain necessarily depend on the risk category of a particular client.

2.2.3.2 Further, low risk provisions shall not apply when there are suspicions of ML/FT or when other factors give rise to a belief that the customer does not in fact pose a low risk

2.2.3.3 Risk Assessment²

The BNK has started to carry out risk assessment 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. (these can be accessed at the URL-

http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml and

<http://www.un.org/sc/committees/1988/list.shtml>)

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 to be applied. The assessment shall be documented, updated regularly and made available to competent authorities and self-regulating bodies, as and when required.

²SEBI Circular No. CIR/ MIRSD/ 1/ 2014 dated March 12, 2014

2.2.4 Clients of special category (CSC): Such clients shall include the following:

- a) Non - resident clients
- b) High net-worth clients,
- c) Trust, Charities, Non-Governmental Organizations (NGOs) and organizations receiving donations
- d) Companies having close family shareholdings or beneficial ownership
- e) Politically Exposed Persons (PEP) are individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior government/judicial/military officers, senior executives of state-owned corporations, important political party officials, etc. The additional norms applicable to PEP as contained in the subsequent para 2.2.5 of this circular shall also be applied to the accounts of the family members or close relatives of PEPs.
- f) Companies offering foreign exchange offerings
- g) Clients in high risk countries. While dealing with clients from or situate in high risk countries or geographic areas or when providing delivery of services to clients through high risk countries or geographic areas i.e. places where existence or effectiveness of action against money laundering or terror financing is suspect, intermediaries apart from being guided by the Financial Action task Force (FATF) statements that inter alia identify such countries or geographic areas that do not or insufficiently apply the FATF Recommendations, published by the FATF on its website (www.fatf-gafi.org) from time to time, shall also independently access and consider other publicly available information along with any other information which they may have access to.

However, this shall not preclude intermediaries from entering into legitimate transactions with clients from or situate in such high risk countries and geographic areas or delivery of services through such high risk countries or geographic areas.

- h) Non face to face clients
- i) Clients with dubious reputation as per public information available etc.

The above mentioned list is only illustrative and the intermediary shall exercise independent judgment to ascertain whether any other set of clients shall be classified as CSC or not.

2.2.5 Client identification procedure:

2.2.5.1 Our 'Know your Client' (KYC) policy clearly spells out the client identification procedure to be carried out at different stages i.e. while establishing the BNK – client relationship, while carrying out transactions for the client or when the BNK has doubts regarding the veracity or the adequacy of previously obtained client identification data.

The KYC / client identification procedures have been specified and strengthened by SEBI / Stock Exchanges / Depositories from time to time. A specific do and do not has been suggested, which is followed in full by BNK.

In order to further strengthen the KYC norms and identify every participant in the securities market with their respective PAN thereby ensuring sound audit trail of all the transactions, PAN has been made sole identification number for all participants transacting in the securities market and further 'in-person' verification mode has been included by us without which no client is registered.

BNK has put in place necessary procedures to determine whether their existing/potential client is a politically exposed person (PEP). Such procedures include seeking additional information from clients and also accessing publicly available information through internet.

BNK has directed all its employees to obtain senior management approval for establishing business relationships with Politically Exposed Persons. Where a client has been accepted and the client or beneficial owner is subsequently found to be, or subsequently becomes a PEP, compliance officer is directed to obtain senior management approval to continue the business relationship. BNK has asked its accounting employees to take reasonable measures to verify source of funds of clients identified as PEP.

BNK has directed that the client should be identified by the employees by using reliable sources including documents / information. The employees should obtain adequate information to satisfactorily establish the identity of each new client and the purpose of the intended nature of the relationship.

The information should be adequate enough to satisfy Compliance Officer and other regulatory / enforcement authorities in future that due diligence was observed by the employees of BNK in compliance with the Guidelines. to be seen prior to acceptance

of a copy. Failure by prospective client to provide satisfactory evidence of identity should be noted and reported to the higher authority by the employees. SEBI / Stock Exchanges /



BNK SECURITIES PVT LTD

CIN No. U67120WB1995PTC071182

www.bnkcapiatal.com

PMLA POLICY

Depositories has also prescribed the minimum requirements relating to KYC from time to time and the same is being implemented to enforce regulatory requirement.

A copy of the above client identification programme shall be forwarded to the Director, FIU-INDIA

We are adopting the risk based approach at the time of establishing business relationship with a client but no exemption from obtaining the minimum information/documents from clients is advised by us.

2.2.5.2 SEBI has prescribed the minimum requirements relating to KYC for certain classes of registered intermediaries from time to time as detailed in Schedule II. Taking into account the basic principles enshrined in the KYC norms which have already been prescribed or which may be prescribed by SEBI from time to time. BNK frames its own internal directives based on their experience in dealing with their clients and legal requirements as per the established practices.

Further BNK conducts ongoing due diligence where it notices inconsistencies in the information provided. The underlying objective shall be to follow the requirements enshrined in the PMLA, SEBI Act and Regulations directives and circulars issued thereunder so that the intermediary is aware of the clients on whose behalf it is dealing.

2.2.5.3 BNK has formulated and implemented a CIP which shall incorporate the requirements of the PML Rules Notification No. 9/2005 dated July 01, 2005 (as amended from time to time), which notifies rules for maintenance of records of the nature and value of transactions, the procedure and manner of maintaining and time for furnishing of information and verification of records of the identity of its clients and such other additional requirements that it considers appropriate to enable it to determine the true identity of its clients.

2.2.5.4 Irrespective of the amount of investment made by clients, no minimum threshold or exemption is available from obtaining the minimum information/documents from clients as stipulated in the PML Rules/ SEBI Circulars (as amended from time to time) regarding the verification of the records of the identity of clients. Further no exemption from carrying out CDD exists in respect of any category of clients. In other words, there shall be no minimum investment threshold/ category-wise exemption available for carrying out CDD measures by BNK. This shall be strictly implemented by BNK.

2.2.6 Reliance on third party for carrying out Client Due Diligence (CDD)³

2.2.6.1 Registered intermediaries may rely on a third party for the purpose of

- a) identification and verification of the identity of a client and
- 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. Such third party shall be regulated, supervised or monitored for, and have measures in place for compliance with CDD and

³SEBI Circular No. CIR/ MIRSD/ 1/ 2014 dated March 12, 2014

record-keeping requirements in line with the obligations under the PML Act.

2.2.6.2 Such reliance shall be subject to the conditions that are specified in Rule 9 (2) of the PML Rules and shall be in accordance with the regulations and circulars/ guidelines issued by SEBI from time to time. Further, it is clarified that the BNK shall be ultimately responsible for CDD and undertaking enhanced due diligence measures, as applicable.

2.3. Record Keeping

2.3.1 BNK is ensuring the compliance with the record keeping requirements contained in the SEBI Act, 1992, Rules and Regulations made there-under, PML Act, 2002 as well as other relevant legislation, Rules, Regulations, Exchange Bye-laws and Circulars.

2.3.2 BNK is maintaining such records as are sufficient to permit reconstruction of individual transactions (including the amounts and types of currencies involved, if any) so as to provide, if necessary, evidence for prosecution of criminal behavior..

2.3.3 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 reconstructing a financial profile of the suspect account. To enable this reconstruction, BNK shall retain the following information for the accounts of their clients in order to maintain a satisfactory audit trail:

- a) the beneficial owner of the account;
- b) the volume of the funds flowing through the account; and
for selected transactions:
 - a) the origin of the funds
 - b) the form in which the funds were offered or withdrawn, e.g. cheques, demand drafts etc.
 - c) the identity of the person undertaking the transaction;
 - d) the destination of the funds;
 - e) the form of instruction and authority.

- 2.3.4 BNK has taken steps to have backups of all old data & current data to ensure that all client based information and transaction records and information are available on a timely basis to the competent investigating authorities. It has asked its employees and respective managers to retain certain records, e.g. customer identification, account files, and business correspondence, for periods which may exceed that required under the SEBI Act, Rules and Regulations framed there-under PMLA 2002, other relevant legislations, Rules and Regulations or Exchange by-laws or circulars.
- 2.3.5 More specifically, all the intermediaries shall put in place a system of maintaining proper record of transactions prescribed under Rule 3 of PML Rules as mentioned below:
- 2.3.5.1 all cash transactions of the value of more than ten lakh rupees or its equivalent in foreign currency;
 - 2.3.5.2 all series of cash transactions integrally connected to each other which have been individually valued below rupees ten lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds an amount of ten lakh rupees or its equivalent in foreign currency;
 - 2.3.5.3 all cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine or where any forgery of a valuable security or a document has taken place facilitating the transactions;
 - 2.3.5.4 all suspicious transactions whether or not made in cash and by way of as mentioned in the Rules.

2.4 Information to be maintained

- 2.4.1 BNK has implemented a system to maintain and preserve the following information in respect of transactions referred to in Rule 3 of PML Rules by proper data backup / print out:
- a) the nature of the transactions;
 - b) the amount of the transaction and the currency in which it is denominated;
 - c) the date on which the transaction was conducted; and
 - d) the parties to the transaction.

2.5 Retention of Records⁴

- 2.5.1 BNK has taken appropriate steps to evolve an internal mechanism for proper maintenance and preservation of such records and information in a manner that allows easy and quick retrieval of data as and when requested by the competent authorities. Further, the records

mentioned in Rule 3 of PML Rules are maintained and preserved for a period of five years from the date of transactions between the client and intermediary.

2.5.2 As stated in sub-section 2.2.5, BNK has formulated and implement the CIP containing the requirements as laid down in Rule 9 of the PML Rules and such other additional requirements that it considers appropriate. Records evidencing the identity of its clients and beneficial owners as well as account files and business correspondence are maintained and preserved for a period of five years after the business relationship between a client and intermediary has ended or the account has been closed, whichever is later.

2.5.3 Thus the following document are retained for a period specifically fixed:

- a) All necessary records on transactions, both domestic and international, shall be maintained at least for the minimum period prescribed under the relevant Act and Rules (PMLA and rules framed thereunder as well SEBI Act) and other legislations, Regulations or exchange bye-laws or circulars.
- b) BNK shall maintain and preserve the records of documents evidencing the identity of its 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 intermediary has ended or the account has been closed, whichever is later.

⁴SEBI Circular No. CIR/ MIRSD/ 1/ 2014 dated March 12, 2014

- 2.5.4 In situations where the records relate to on-going investigations or transactions which have been the subject of a suspicious transaction reporting, they shall be retained until it is confirmed that the case has been closed.
- 2.5.5 **Records of information reported to the Director, Financial Intelligence Unit – India (FIU – IND)⁵:** BNK shall maintain and preserve the records of information related to transactions, whether attempted or executed, which are reported to the Director, FIU – IND, as required under Rules 7 and 8 of the PML Rules, for a period of five years from the date of the transaction between the client and the intermediary.

2.6 Monitoring of transactions

- 2.6.1 BNK has a policy of regular monitoring of transactions for ensuring effectiveness of the Anti Money Laundering procedures. All transactions are monitored on line during trading hours and are subject to restriction fixed in the client master..
- 2.6.2 BNK, at the day end, reviews all complex, unusually large transactions / patterns which appear to have no economic purpose. It reconfirms the identity of the client in such cases and payment pattern / margin is also cross verified. The background including all documents / office records / memorandums / clarifications sought pertaining to such transactions and purpose thereof shall also be examined carefully and findings shall be recorded in writing. Further such findings, records and related documents shall be made available to auditors and also to SEBI / stock exchanges / FIUIND / other relevant Authorities, during audit, inspection or as and when required. These records are required to be "maintained and preserved for a period of five years from the date of transaction between the client and intermediary" as is required under the PMLA..
- 2.6.3 Under the rules and regulations of the stock exchange all records of the transactions are preserved and maintained and also section 12 of the PMLA 2002 is complied with. Transactions of suspicious nature or any other transaction notified under section 12 of the act is reported to the Principal Officer and in turn are required to be informed to appropriate law authority. Suspicious transactions should also be regularly reported to the higher authorities / head of the department.

2.6.4 BNK has authorised its Principal Officer to randomly examine a selection of transaction undertaken by clients to comment on their nature i.e. whether they are Page 12 of 18 in the suspicious transactions or not on a half yearly basis seeing the turnover pattern of its business.

2.7 Suspicious Transaction Monitoring and Reporting

2.7.1 BNK has undertaken to take appropriate steps to enable suspicious transactions to be recognized and have appropriate procedures for reporting suspicious transactions by regularly monitoring the transaction. While determining suspicious transactions, BNK shall be guided by the definition of a suspicious transaction contained in PML rules as amended from time to time.

2.7.2 The following list of circumstances which may be in the nature of suspicious transactions is given below and is taken on record by the BNK board. This list helps the executing officers in the company to monitor the transaction under PMLA rules.

- a) Clients whose identity verification seems difficult or clients appears not to cooperate
- b) Asset management services for clients where the source of the funds is not clear or not in keeping with clients apparent standing / business activity;
- c) Clients in high-risk jurisdictions or clients introduced by banks or affiliates or other clients based in high risk jurisdictions;
- d) Substantial increases in business without apparent cause;
- e) Unusually large cash deposits made by an individual or business;
- f) Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
- g) Transfer of investment proceeds to apparently unrelated third parties;
- h) Unusual transactions by CSCs and businesses undertaken by shell corporations, offshore banks/ financial services, businesses reported to be in the nature of export-import of small items.

2.7.3 All suspicion transaction are required to be immediately notified to the Principal Officer of the company. The same are required to given in writing to the Principal Officer along with related documents and ledger copy of the account. Employees are instructed that they should ensure that there is continuity in dealing with the client as normal until told otherwise and the client should not be told of the report/suspicion. In exceptional circumstances, principal officer at his discretion may not give consent to continue to operate the account, and transactions may be suspended, in one or more jurisdictions concerned in the transaction, or other action taken. The principal officer and other appropriate compliance, risk management and related staff members shall have timely access to client identification data and CDD information, transaction records and other relevant information.

2.7.4 It is likely that in some cases transactions are abandoned /aborted by client on being asked to give some details or to provide documents. The Principal Officer and employees are

instructed to report all such attempted transactions in STRs, even if not completed by client, irrespective of the amount of the transaction.

- 2.7.5 Clause 2.2.4 (g) of this Master Circular categorizes clients of high risk countries, including countries where existence and effectiveness of money laundering controls is suspect or which do not or insufficiently apply FATF standards, as 'CSC'. Intermediaries are directed that such clients shall also be subject to appropriate counter measures. These measures may include a further enhanced scrutiny of transactions, enhanced relevant reporting mechanisms or systematic reporting of financial transactions, and applying enhanced due diligence while expanding business relationships with the identified country or persons in that country etc

2.8. List of Designated Individuals/ Entities

- 2.8.1 An updated list of individuals and entities which are subject to various sanction measures such as freezing of assets/accounts, denial of financial services etc., as approved by the Security Council Committee established pursuant to various United Nations' Security Council Resolutions (UNSCRs) can be accessed at its website at <http://www.un.org/sc/committees/1267/consolist.shtml>. Registered intermediaries are directed to ensure that accounts are not opened in the name of anyone whose name appears in said list. Registered intermediaries shall continuously scan all existing accounts to ensure that no account is held by or linked to any of the entities or individuals included in the list. Full details of accounts bearing resemblance with any of the individuals/entities in the list shall immediately be intimated to SEBI and FIU-IND.

2.9. Procedure for freezing of funds, financial assets or economic resources or related services

- 2.9.1 Section 51A of the Unlawful Activities (Prevention) Act, 1967 (UAPA), relating to the purpose of prevention of, and for coping with terrorist activities was brought into effect through UAPA Amendment Act, 2008. In this regard, the Central Government has issued an Order dated August 27, 2009 ([Annexure 1](#)) detailing the procedure for the implementation of Section 51A of the UAPA. ⁶
- 2.9.2 In view of the reorganization of Divisions in the Ministry of Home Affairs and allocation of work relating to countering of terror financing to the Counter Terrorism and Counter Radicalization (CTCR) Division, the Government has modified the earlier order dated August 27, 2009 by the order dated March 14, 2019 ([Annexure 2](#)) for strict compliance.⁷

Under the aforementioned Section, the Central Government is empowered to 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. The Government is also further empowered to 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



www.bnkcapital.com

BNK SECURITIES PVT LTD

CIN No. U67120WB1995PTC071182

PMLA POLICY

engaged in terrorism.

⁶ SEBI Circular No. ISD/ AML/ CIR – 2/ 2009 dated October 23, 2009

⁷ SEBI Circular No. SEBI/HO/MIRSD/DOP/CIR/P/2019/69 dated May 28, 2019

2.10. Reporting to Financial Intelligence Unit-India

2.10.1. In terms of the PML Rules, intermediaries are required to report information relating to cash and 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.
Website: <http://fiuindia.gov.in>

2.10.2. BNK shall ensure and carefully go through all the reporting requirements and formats that are available on the website of FIU – IND under the Section Obligation of Reporting Entity – Furnishing Information – Reporting Format (https://fiuindia.gov.in/files/downloads/Filing_Information.html). These documents contain detailed directives on the compilation and manner/procedure of submission of the reports to FIU-IND. The related hardware and technical requirement for preparing reports, the related data files and data structures thereof are also detailed in these documents While detailed instructions for filing all types of reports are given in the instructions part of the related formats, intermediaries shall adhere to the following:

- a) The Cash Transaction Report (CTR) (wherever applicable) for each month shall be submitted to FIU-IND by 15th of the succeeding month.
- b) The Suspicious Transaction Report (STR) shall 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 shall record his reasons for treating any transaction or a series of transactions as suspicious. It shall be ensured that there is no undue delay in arriving at such a conclusion.
- c) The Non Profit Organization Transaction Reports (NTRs) for each month shall be submitted to FIU-IND by 15th of the succeeding month.

- d) The Principal Officer will be responsible for timely submission of CTR, STR and NTR to FIU-IND;
- e) Utmost confidentiality shall be maintained in filing of CTR, STR and NTR to FIU- IND.
- f) No nil reporting needs to be made to FIU-IND in case there are no cash/ suspicious/ non – profit organization transactions to be reported.

2.10.3. BNK shall not put any restrictions on operations in the accounts where an STR has been made. Intermediaries and their directors, officers and employees (permanent and temporary) shall be prohibited from disclosing (“tipping off”) the fact that a STR or related information is being reported or provided to the FIU-IND. This prohibition on tipping off extends not only to the filing of the STR and/ or related information but even before, during and after the submission of an STR. Thus, it shall be ensured that there is no tipping off to the client at any level

It is clarified that the BNK, irrespective of the amount of transaction and/or the threshold limit envisaged for predicate offences specified in part B of Schedule of PMLA, 2002, shall file STR if they have reasonable grounds to believe that the transactions involve proceeds of crime.

2.11. Designation of officers for ensuring compliance with provisions of PMLA

2.11.1. Appointment of a Principal Officer:

2.11.1.1 To ensure proper discharge legal obligations to report suspicious transactions to the authorities, Mr Ajit Khandelwal, Director, appointed as the Principal Officer would act as a central reference point in facilitating onward reporting of suspicious transactions and for playing an active role in the identification and assessment of potentially suspicious transactions.

Names, designation and addresses (including e-mail addresses) of 'Principal officer' including any changes therein will be intimated to the Office of the Director-FIU.

As a matter of principle, BNK appoints one of its directors as 'Principal Officer' so

as to discharge his functions with independence and authority.

2.11.2. Appointment of a Designated Director:⁸

- a) In addition to the existing requirement of designation of a Principal Officer, the registered intermediaries shall also designate a person as a 'Designated Director'. In terms of Rule 2 (ba) of the PML Rules, the definition of a Designated Director reads as under: "Designated Director means a person designated by the reporting entity to ensure overall compliance with the obligations imposed under chapter IV of the Act and the Rules and includes — (i) the Managing Director or a Whole-time Director duly authorized by the Board of Directors if the reporting entity is a company, (ii) the managing partner if the reporting entity is a partnership firm, (iii) the proprietor if the reporting entity is a proprietorship concern, (iv) the managing trustee if the reporting entity is a trust, (v) a person or individual, as the case may be, who controls and manages the affairs of the reporting entity if the reporting entity is an unincorporated association or a body of individuals, and (vi) such other person or class of persons as may be notified by the Government if the reporting entity does not fall in any of the categories above."
- b) In terms of Section 13 (2) of the PML Act (as amended by the Prevention of Money-laundering (Amendment) Act, 2012), the Director, FIU-IND can take appropriate action, including levying monetary penalty, on the Designated Director for failure of the intermediary to comply with any of its AML / CFT obligations. As a matter of principle, BNK appoints Mr. Ajit Khandelwal as the Designated Director so as to take necessary disciplinary actions as the situation may arise.
- c) Registered intermediaries shall communicate the details of the Designated Director, such as, name, designation and address to the Office of the Director, FIU-IND.

2.12. Employees' Hiring/Employee's Training/ Investor Education

2.12.1. Hiring of Employees

2.12.1.1 The registered intermediaries shall have adequate screening procedures in place to ensure high standards when hiring employees. They shall identify the



www.bnkcapital.com

BNK SECURITIES PVT LTD

CIN No. U67120WB1995PTC071182

PMLA POLICY

key positions within their own organization structures having regard to the risk of money laundering and terrorist financing and the size of their business and ensure the employees taking up such key positions are suitable and competent to perform their duties.

2.12.2. Employees' Training:

2.12.2.1 Intermediaries must have an ongoing employee training programme so that the members of the staff are adequately trained in AML and CFT procedures. Training requirements shall have specific focuses for frontline staff, back office staff, compliance staff, risk management staff and staff dealing with new clients. It is crucial that all those concerned fully understand the rationale behind these directives, obligations and requirements, implement them consistently and are sensitive to the risks of their systems being misused by unscrupulous elements.

2.12.3. Investors Education

2.12.3.1 Implementation of AML/CFT measures requires intermediaries 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. Intermediaries shall prepare specific literature/ pamphlets etc. so as to educate the client of the objectives of the AML/CFT programme.

The Board of Directors in its meeting on 27th January 2020 have adopted these revised policies (as directed by SEBI circular no. SEBI/HO/MIRSD/DOP/CIR/P/2019/113 dated 15th October 2020 to be implemented and followed by the Company for compliance under Anti Money Laundering activities and fulfilment of obligations of Intermediaries under Prevention of Money Laundering Act, 2002 and rules framed there under.

Single SEBI Registration No INZ000220037

IN DP-CDSL-508-2009 (DP-CDSL)

INH300003520 (Research Entity)

SCHEDULE I
List of key circulars/ directives issued with regard to KYC, CDD, AML and CFT

S. No.	Circular Number	Date of Circular	Subject	Broad area covered
1.	SEBI/HO/MIRSD/D OP/CIR/P/2019/69	May 28, 2019	Combating Financing of Terrorism (CFT) under Unlawful Activities (Prevention) Act, 1967 – Directions to stock exchanges, depositories and all registered intermediaries	Procedure to be followed for the freezing of assets of individual or entities engaged in terrorism
2.	SEBI/ HO/ IMD/ FIIC/ CIR/ P/ 2017/ 068	June 30, 2017	Acceptance of e -PAN card for KYC purpose	E-PAN issued by CBDT for KYC compliance by FPI
3.	SEBI/ HO/ MRD/ DP/ CIR/ P/ 2016/ 134	December 15, 2016	Master Circulars for Depositories	Opening of BO Accounts
4.	CIR/ IMD/ FPIC/ 123/ 2016	November 17, 2016	Review of requirement for copy of PAN Card to open accounts of FPIs	Verification and submission of PAN Card by FPI
5.	CIR/ MIRSD/ 120 / 2016	November 10, 2016	Uploading of the existing clients' KYC details with Central KYC Records Registry (CKYCR) System by the registered intermediaries	Time lines for registered intermediaries in respect of uploading KYC data of the new and existing individual clients with CKYCR
6.	SEBI/ HO/ IMD / DF3/ CIR/ P / 2016/ 84	September 14, 2016	Master Circular for Mutual Funds	Compliance with AML/ CFT

						CDD directives of SEBI stipulated in Master Circular dated September 14, 2016
7.	CIR/ 2016	MIRSD/	66/	July 21, 2016	Operationalization of Central KYC Records Registry (CKYCR)	Authorization of Central Registry of Securitization and Asset Reconstruction and Security interest of India (CERSAI) for receiving, storing, safeguarding, retrieving the KYC records and finalizing template of KYC
8.	CIR/ IMD/ FPI&C/ 59/ 2016			June 10, 2016	Know Your Client (KYC) norms for ODI subscribers, transferability of ODIs, reporting of suspicious transactions, periodic review of systems and modified ODI reporting format	Applicability of Indian KYC/AML norms for Client Due Diligence, KYC Review, Suspicious Transactions Report, Reporting of complete transfer trail of ODIs, Reconfirmation of ODI positions, Periodic Operational Evaluation
9.	CIR/ 2016	MIRSD/	29/	January 2016	22, Know Your Client Requirements - Clarification on voluntary adaptation of Aadhaar based e-KYC process	Client identification and authentication from UIDAI, Investment Limit and mode of payment to Mutual Funds, PAN verification, additional due diligence in case of material difference in information

10.	CIR/ IMD/ FIIC/ 11/ 2014	June 16, 2014	Know Your Client (KYC) requirements for Foreign Portfolio Investors (FPIs)	Process to be followed by DDPs to share the relevant KYC documents of FPIs with the banks and record of transfer of documents
11.	CIR/ MIRSD/ 1/ 2014	March 12, 2014	Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under	Consequential modifications and additions to Master Circular CIR/ ISD/ AML/ 3/ 2010 dated December 31, 2010 in respect of Risk Assessment, Reliance on third party for carrying out Client Due Diligence (CDD), Record keeping requirements, Records of information reported to the Director, Financial Intelligence Unit - India (FIU-IND), Appointment of a Designated Director
12.	CIR/ MIRSD/ 13/ 2013	December 26, 2013	Know Your Client requirements	Shifting of certain information in Section C of Part I to Part II of the AOF, information required to be captured in the systems of KRAs
13.	CIR/ MIRSD/ 09/ 2013	October 8, 2013	Know Your Client Requirements	Acceptance of e-KYC service launched by UIDAI as a valid process for KYC verification

14.	CIR/ MIRSD/ 07 / 2013	September 12, 2013	Know Your Client Requirements for Eligible Foreign Investors	Partial modification to the provisions of circular No CIR/MIRSD/ 11 /2012 dated September 5, 2012, Classification of Eligible foreign investors investing under Portfolio Investment Scheme ('PIS') route as Category I, II and III
15.	CIR /MIRSD/ 4 /2013	March 28, 2013	Amendment to SEBI ((Know Your Client Registration Agency) Regulations, 2011 and relevant circulars	Modification of circulars dated December 23, 2011 and April 13, 2012, to the extent of requirement for sending original KYC documents of the clients to the KRA
16.	CIR/ MIRSD/ 2/ 2013	January 24, 2013	Guidelines on Identification of Beneficial Ownership	Client Due Diligence to identify and verify the identity of persons who beneficially own or control the securities account for clients other than individuals or trusts and client which is a trust. Exemption in case of listed companies, Applicability for foreign investors and Implementation
17.	CIR/ MIRSD/ 01 /2013	January 04, 2013	Rationalization process for obtaining PAN by Investors	Verification the PAN of clients online at the Income Tax website

18.	CIR/ MIRSD/ 11/ 2012	September 5, 2012	Know Your Client Requirements	Clarifications for Foreign Investors viz. FIIs, Sub Accounts and QFIs w.r.t. implementation of SEBI circulars no. CIR /MIRSD/ 16/ 2011 dated August 22, 2011 and MIRSD/ SE/ Cir- 21/ 2011 dated October 5, 2011 on know your client norms
19.	CIR/ MIRSD/ 09 / 2012	August 13, 2012	Aadhaar Letter as Proof of Address for Know Your Client (KYC) norms.	Admissibility of Aadhaar letter issued by UIDAI as Proof of Address in addition to its presently being recognized as Proof of Identity
20.	MIRSD/ Cir-5 / 2012	April 13, 2012	Uploading of the existing clients' KYC details in the KYC Registration Agency (KRA) system by the intermediaries	Process to avoid duplication of KYC, guidelines for uploading the KYC data of the existing clients, Schedule for implementation
21.	MIRSD/ Cir- 26 / 2011	December 23, 2011	Guidelines in pursuance of the SEBI KYC Registration Agency (KRA) Regulations, 2011 and for In-Person Verification (IPV)	Guidelines for Intermediaries, Guidelines for KRAs, Guidelines w.r.t In-Person Verification (IPV)

22.	MIRSD/ 2011	Cir-23/ December 2, 2011	The Securities and Exchange Board of India (KYC Registration Agency) Regulations, 2011.	Centralization of the KYC records to avoid duplication of KYC process
23.	CIR/ MIRSD/ 2011	22/ October 25, 2011	'In-person' verification (IPV) of clients by subsidiaries of stock exchanges, acting as stock brokers	Clarification w.r.t ultimate responsibility for 'in-person' verification
24.	MIRSD/ SE/ 2011	Cir-21/ October 5, 2011	Uniform Know Your Client (KYC) Requirements for the Securities Markets	Clarification w.r.t different KYC forms used by Market Intermediaries, Guidelines for KYC form capturing the basic details about the client and additional details specific to the area of activity of the intermediary being obtained
25.	CIR/ MIRSD/ 2011	16/ August 22, 2011	Simplification and Rationalization of Trading Account Opening Process	Client account opening Process, Client Account Opening Form, Rights & Obligations of stock broker, sub-broker and client for trading on exchanges Uniform Risk Disclosure Documents, Guidance Note detailing Do's and Don'ts for trading
26.	CIR/ ISD/ AML/ 2010	3/ December 31, 2010	Master Circular on AML/CFT	Anti - Money Laundering (AML) Standards/ Combating the Financing of

				Terrorism (CFT) / Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under
27.	CIR/ MRD/ DP / 37/ 2010	December 14, 2010	Acceptance of third party address as correspondence address	Capturing of address other than that of the BO as the correspondence address.
28.	CIR/ MRD/ DMS/ 13/ 2010	August 31, 2010	Guidelines on the Execution of Power of Attorney by the Client in favour of Stock Broker/ DP	Clarifications on the Execution of the POA by the client
29.	CIR/ MRD/ DMS/ 13/ 2010	April 23, 2010	Guidelines on the Execution of Power of Attorney by the Client in favour of Stock Broker/ DP	Guidelines on the Execution of Power of Attorney by the Client
30.	CIR/ ISD/ AML/ 2/ 2010	June 14, 2010	Additional Requirements for AML/ CFT	Additional Requirements on retention of documents, monitoring, tipping off, updation of records and other clarifications.
31.	CIR/ ISD/ AML/ 1/ 2010	February 12, 2010	Master Circular –AML/ CFT	Framework for AML/ CFT including procedures for CDD, client identification, record keeping & retention, monitoring and reporting of STRs
32.	SEBI/ MIRSD/ Cir No.02/ 2010	January 18, 2010	Mandatory Requirement of in-person verification of clients.	In-person verification done for opening beneficial owner's account by a DP will hold good for opening

				trading account for a stock broker and vice versa, if the DP and the stock broker is the same entity or if one of them is the holding or subsidiary.
33.	ISD/ AML/ CIR-2/ 2009	October 23, 2009	Directives on CFT under Unlawful Activities (Prevention) Act, 1967	Procedure to be followed for the freezing of assets of individual or entities engaged in terrorism
34.	ISD/ AML/ CIR-1/ 2009	September 01, 2009	Additional AML/ CFT obligations of Intermediaries under PMLA, 2002 and rules framed	Additional AML/ CFT requirements and clarifications thereon
35.	ISD/ AML/ CIR-1/ 2008	December 19, 2008	Master Circular on AML/ CFT directives	Framework for AML/ CFT including procedures for CDD, client identification, record keeping & retention, monitoring and reporting of suspicious transactions.
36.	MIRSD/ DPSIII/ 130466/ 2008	July 2, 2008	In-Person verification of clients by stock-brokers	Responsibility of stock brokers to ensure in-person verification by its own staff.
37.	MRD/ DoP/ Cir-20/ 2008	June 30, 2008	Mandatory Requirement of PAN	Exception for certain classes of persons from PAN being the sole identification number for all participants trading in the securities market.
38.	F.No.47/ 2006/ ISD/ SR/ 122539	April 4, 2008	In-person verification of BO's when opening demat accounts	In-person verification to be carried out by staff of depository participant.

39.	MRD/ DoP/ Cir- 20/ 2008	April 3, 2008	Exemption from mandatory requirement of PAN.	Exemption for investors residing in the State of Sikkim from PAN being the sole identification number for trading in the securities market.
40.	F.No.47- 2006 /ISD/ SR/ 118153/ 2008	February 22, 2008	In-Person verification of clients by depositories	Clarification on various topics relating to 'in person' verification of BOs at the time of opening demat accounts
41.	MRD/ DoP/ Dep/ Cir- 12/ 2007	September 7, 2007	KYC Norms for Depositories	Proof of Identity (POI) and Proof of Address (POA) for opening a Beneficiary Owner (BO) Account for non - body corporates
42.	MRD/ DoP/ Cir-05/ 2007	April 27, 2007	PAN to be the sole identification number for all transactions in the securities market	Mandatory requirement of PAN for participants transacting in the securities market.
43.	ISD /CIR/ RR/ AML/ 2/ 06	March 20, 2006	PMLA Obligations Of intermediaries in terms of Rules notified there under	Procedure for maintaining and preserving records, reporting requirements and formats of reporting cash transactions and suspicious transactions
44.	ISD/ CIR/ RR/ AML/ 1/ 06	January 18, 2006	Directives on AML Standards	Framework for AML and CFT including policies and procedures, Client Due Diligence requirements, record keeping, retention, monitoring and reporting

45.	SEBI/ MIRSD/ DPS - 1/ Cir-31/ 2004	August 26, 2004	Uniform Documentary Requirements for trading	Uniform KYC documentary requirements for trading on different segments and exchanges
46.	MRD/ DoP/ Dep/ Cir- 29/ 2004	August 24, 2004	Proof of Identity (POI) and Proof of Address (POA) for opening a Beneficiary Owner	Broadening the list of documents that may be accepted as Proof of Identity (POI) and/or Proof of Address (POA) for the purpose of opening a BO Account
47.	SEBI/ MRD/ SE /Cir- 33/ 2003/ 27/ 08	August 27, 2003	Mode of payment and delivery	Prohibition on acceptance/ giving of cash by brokers and on third party transfer of securities
48.	SMDRP/ Policy/ Cir- 36/ 2000	August 4, 2000	KYC Norms for Depositories	Documentary requirements for opening a beneficiary account.
49.	SMD/ POLICY/ CIRCULARS /5-97	April 11, 1997	Client Registration Form	Formats of client Registration Form and broker clients agreements
50.	SMD-1/ 23341	Nov. 18, 1993	Regulation of transaction between clients and members	Mandatory requirement to obtain details of clients by brokers.