

INTERNAL CODE OF CONDUCT /
CODE OF BUSINESS CONDUCT AND ETHICS
INCLUDING AML STANDARDS

Introduction

KIFS Trade Capital Pvt. Ltd. (KIFS) is SEBI Registered Intermediary and is acting as Stock Broker, Depository Participant, Research Analyst etc. and as such, it is regulated and governed by the statutory requirements of various rules, regulations, bye-laws of respective exchanges, depositories, SEBI and such other statutory authorities and various applicable provisions of different enactments.

It is pertinent to note that it is very difficult to summarize each and every business practices and procedures. It is also very difficult that any business standard cannot and do not cover every issue that may arise, or every situation where ethical decisions must be made, but rather set forth key guiding principles that represent **KIFS's** policies and establish conditions for employment and business transactions with the group.

KIFS Group believes in business integrity and professionalism. It strives to foster a culture of honesty and accountability and its commitment to the highest level of ethical conduct. It also believe that the same should be reflected in all its business activities including, but not limited to, relationships with employees, clients, stock exchanges, regulatory authorities, the government and the public, and its shareholders.

The group happily announce its Internal Code of Conduct (ICC) or Code of Business Conduct and Ethics (the "Code") as a measure of business practice, compliance to statutory requirements and towards establishing anti-money laundering standards. This code shall equally apply / extend to all its group or associate concerns and its executives and personnel, all its clients / constituents, either present or future.

Objectives of the Code

- ◆ To provide full, fair, accurate, timely and understandable disclosures and to communicate effectively so that full and accurate information to be filed with or submitted to the Stock Exchanges, Securities and Exchange Board of India or other regulatory agencies and full adherence to the Compliance with Laws, Rules and Regulations can be achieved;
- ◆ To conduct business affairs with honesty and integrity and in full compliance with all applicable laws, rules and regulations;
- ◆ To disseminates information regarding compliance with the laws, rules and regulations that affect our business;
- ◆ To protect the Confidential proprietary information generated and gathered in our business which plays a vital role in continued growth and ability to compete.

Code:

The group believes that one of its most valuable asset is its reputation for integrity, professionalism and fairness and it recognizes that all actions are the foundation of its reputation and adhering to this Code and applicable law is imperative. This ICC covers certain Internal Rules and Regulations as also General Information to all those who deals with Khandwala Group and are a part and parcel of ICC.

For Employees and Operators:

- ✓ Each employee, personnel and director should endeavor to deal fairly with clients, investors, the public and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.
- ✓ No personnel will use non-public information to trade in securities, or providing a family member, friend or any other person with a "tip", as the same is illegal. All non-public information should be considered inside information and should never be used for personal gain.

- ✓ No personnel will execute his / her personal orders / trades in the system prior to the execution of constituents' orders and will always give priority to the orders of constituents.
- ✓ No personnel will disseminate the internal information and business secrets for any commercial purpose to the outsiders.
- ✓ All personnel shall always maintain all proprietary information in strict confidence, except when disclosure is authorized by superior or required by law.
- ✓ All the personnel having come across the Funds/securities of constituents will take due care that the same shall not be improperly used.
- ✓ All the personnel will try to guide the constituents about the Risk Disclosure Document as specified by the Exchange.
- ✓ All the personnel will try to disseminate the correct information related to Securities Market and will try to boost the knowledge of investors.
- ✓ All the personnel will take due care and precautions to adhere to the requirements of various rules and regulations and all acts such as Companies Act, 2013, SCRA, Prevention of Money Laundering Act, 2002, SEBI Act, Depositories Act, Income Tax Act and all such other acts as may be applicable to the Company, regarding safe keeping and proper maintenance of records and information.
- ✓ All supervisory personnel will conduct Internal Review of our business, to assist in detecting and preventing violations of and achieving compliance with Rules, Bye Laws and Regulations of the Exchange.
- ✓ All the personnel will take care for protecting our assets against loss, theft or other misuse. Loss, theft and misuse of the any of the assets, directly impact our profitability. Any suspected loss, misuse or theft should be reported to a manager/supervisor or the Director.
- ✓ No user / dealer / terminal operator will try to trade in securities outside the established trading system of the exchange.
- ✓ No user / dealer / terminal operator will try to enter order of any constituent at prices of shares other than a share prices disseminated on-line by the Exchange as reference prices.
- ✓ All the personnel will conduct his / her affairs in true spirit and with utmost benefit to the organizations so as to avoid unnecessary complaints of constituents.
- ✓ All the personnel will immediately report of any non-compliances, part-compliances or violations of any of the rules and regulations to superior/higher authority
- ✓ Employees, officers and others are prohibited from taking for themselves, business opportunities that arise through the use of corporate property, information or position.
- ✓ All the personnel will thoroughly understand and if required, obtain any clarification from superior/higher authority and will comply with the following POLICY FOR PREVENTION OF MONEY LAUNDERING.

Policy for Money Laundering:

Background:

In response to mounting concern over money laundering world wide, G-7 summit as held in Paris in the year 1989, a policy making body having Secretariat Organisation for Economic Co-operation and Development (OECD) was established, to work for generating necessary political will / willingness to bring about national legislative and regulatory reforms to combat money laundering and terrorist financing.

World Bank and International Monetary Fund (IMF) have also established a collaborative framework in with Financial Action Task Force (FATF) in this regard. Our country (India) is also one of the member and has been accorded "Observer" status.

Objectives:

The brief objectives of these provisions is to establish general framework for the fight against money laundering, terrorism, financial crimes and corruption.

- ❖ Ensuring that financial institutions are not vulnerable to infiltration or abuse by organized crime groups
- ❖ Building capacity to fight terrorism and trace terrorist money
- ❖ Meeting binding international obligations and avoiding the risk of sanctions or other actions by the international community
- ❖ Avoid becoming heaven for criminals
- ❖ Securing a more transparent and stable financial system that is attractive to foreign investors

What is Money Laundering?

- ✓ To concealing or hiding financial assets with a view to used it without detection of its source that is illegal activity which produced it.

- ✓ Through money laundering, the launder transforms the monetary proceeds derived from criminal activity into funds with an apparent legal source.
- ✓ It is the process by which criminals try to hide and disguise the true source / origin and ownership of proceeds of their illegal/criminal activities.
- ✓ It may be conversion of illegally earned income in to another form so that it appears as a legitimate income.
- ✓ The term “Money Laundering” is also used in relation to financing of terrorist activity (where funds may / may not originate from crime).
- ✓ It is a medium through which dirty money insert in the financial system and make such money look clean.
- ✓ Money is circulated around the financial system in such a way that its ancestry gets hidden.

Activities that can be considered as Illegal / Criminal Activity:

- ✓ Corruption, Bribery, Counterfeiting and Forgery, Smuggling, Extortion, Prostitution,
- ✓ Gambling, Robbery, Fraud, Kidnapping, Tax Evasion, Drug Trafficking

Various stages of Money laundering:

- i. **Placement:** It is an initial stage in which money from criminal activities is placed in financial institution. It may be through various methods viz. arranging or breaking up currency transactions in to portion which falls below reporting threshold for specific purpose to avoid reporting requirements.
- ii. **Layering:** It is a process of conducting a complex series of financial transactions with a purpose of hiding origin of money and hindering any attempt to trace the funds. It may include multiple trades for security, Purchase of financial product such as Life Insurance or purchase of legitimate businesses.
- iii. **Integration:** Last and final stage in the re-injection of the laundered proceeds back in to the economy in such a way that they re-enter the financial system as normal business funds.

Consequences of Money Laundering: It,

- Finances terrorism
- Encourage crime
- Endangers society at large
- Weakening of macro economic factors of country
- Affects the integrity of the financial system
- Government control on economy reduces
- Weakening of Law & Order

Indian Framework:

India has also framed, “The Prevention of Money Laundering Act, 2002” (PMLA) which came into effect w.e.f. 01.07.2005. A separate Foreign Intelligence Unit (FIU) is also established as a central monitoring agency / central repository to combat Money Laundering. Necessary notifications / rules / guidelines / circulars / recommendations etc. are also issued and being issued by various regulatory authorities including SEBI from time to time.

Applicability of PMLA: The provisions of the Act are applicable to Banking Company, Financial Institution and Intermediary (which includes, stock broker, sub-broker, share transfer agents, portfolio manager and other intermediaries associated with Securities Market and registered under section 12 of SEBI Act, 1992.)

All the aforesaid entities have to maintain a record of all the transactions, its nature and value involved. Such transactions shall include:

- (a) All cash transactions > Rs. 10.00 lacs or its equivalent in foreign currency
- (b) All integrally connected series of cash transactions < Rs. 10.00 lacs or its equivalent in foreign currency within one calendar month
- (c) All suspicious transactions

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

- (a) Gives a rise to a reasonable ground of suspicion that it may involve the proceeds of crime
- (b) Identity verification or address seems difficult or found to be forged / false
- (c) Gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

- (d) Unusual and unexplained large value of transaction
- (e) Unusual and unexplained activity in dormant accounts\
- (f) Transfer of large sums of money to / from overseas locations.
- (g) Appears to be made in circumstances of unusual or unjustified complexity
- (h) Appears to have no economic rationale or bonafide purpose.
- (i) Asset Management services where the source of the funds is not clear or not in keeping with apparent standing / business activity

The Company has therefore put in place the following policies which shall be understood and adhered by all the employees and those associated with KIFS Trade Capital Private Limited with immediate effect:

- KIFS is an intermediary registered with SEBI and as such is required to comply with various rules, regulations, byelaws, circulars and such other directions / provisions as may be applicable. Due to the very nature of our business as a matter of compliance, KIFS do not deal in cash transactions from clients. KIFS also maintains proper records of all transactions entered into including adherence to the Regulations of the PMLA 2002 and accordingly, the Company shall maintain a record of all the transactions specially for the above said purpose which include:
 - a. All cash transactions of the value of more than Rs. 10 lacs or its equivalent in foreign currency, if any.
 - b. All series of cash transactions essentially connected to each other which have been valued below Rs 10 lacs or its equivalent in foreign currency where such series of transactions take place within one calendar month, if any.
 - c. All suspicious transactions whether 'integrally or remotely connected or related whether or not made in cash and including, inter-alia, credits or debits into from any non monetary account such as d-mat account, or security account.
- The Company shall:
 - a. Take steps to regularly review the policies and procedures on prevention of money laundering and terrorist financing to ensure their effectiveness. Further in order to ensure effectiveness of policies and procedures, appointed Compliance Officer as a reviewing officer for the above said purpose.
 - b. Take steps to adopt customer acceptance policies and procedures which are sensitive to the risk of money laundering and terrorist financing.
 - c. Strictly comply with the customer due diligence ("CDD") measures to an extent that is sensitive to the risk of money laundering and terrorist financing depending on the type of customer, business relationship or transaction.
 - d. Take steps to develop staff members' awareness and vigilance to guard against money laundering and terrorist financing.
 - e. Strictly comply with communication of group policies relating to prevention of money laundering and terrorist financing to all management and relevant staff that handle account information, securities transactions, money and customer records etc. whether in branches, departments or subsidiaries.
 - f. Strictly comply with customer acceptance policy and customer due diligence measures, including requirements for proper identification.
 - g. Maintain relevant records.
 - h. Monitor Compliance with relevant statutory and regulatory requirements;
 - i. Co-operate with the relevant law enforcement authorities, including the timely disclosure of information and such other measures as may be deem fit and proper and required.

Client Due Diligence (CDD)

- **Client Identification and Registration:** This is first stage of contact with the client. It is very important to take adequate details from the clients to maintain a record of the details of the clients. 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 including CKYC & KRA formalities.
 1. **Identification of Beneficial Ownership** : KIFS shall obtain sufficient information from the clients in order to identify persons who beneficially own or control the security account. Whenever it is apparent that the securities acquired or maintained through an account are beneficially owned by the party(ies) other than the client, KIFS shall identify such party(ies) using Client Identification and Verification procedures. For this purpose, Beneficial owner is the natural person(s) 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.

Following shall be considered for identification of Beneficial Ownership :

a. For Individual Clients : KIFS shall identify the beneficial ownership in case the client is an individual by using reliable, independent source documents, data or information.

b. For 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, KIFS shall identify the beneficial ownership of the client by using following information :

i) The identity of natural person, who whether acting alone or together or through one or more judicial person, exercise control through ownership or who ultimately has a controlling ownership interest.

Explanation : For this purpose, Controlling Ownership Interest means ownership of / entitlement to :

- More than 25% of shares or capital or profits of the judicial person, where the judicial person is a company

- More than 15% of the capital or profits of the judicial person, where the judicial person is a partnership

- More than 15% of the property or capital or profits of the judicial person, where the judicial person is an unincorporated association or body of individuals.

ii) In case where there exist doubt as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interest, the identity of the natural person exercising control over the judicial person through other means i.e. through voting rights, agreement, arrangement or in any other manner.

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

c. For Clients which is trust : Where the client is a Trust, KIFS shall identify the beneficial ownership through the identity of 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.

d. Exemption in case of listed companies : It is not mandatory for KIFS to identify the beneficial ownership / controlling interest where the client is a Company listed on a stock exchange or is a majority owned subsidiary of such listed company.

e. Applicability for Foreign Investors : While dealing with foreign investors, KIFS shall take into consideration the clarifications issued by SEBI vide its Circulars CIR/MIRSD/11/2012 dated 05-09-2012 and CIR/MIRSD/07/2013 dated 12-09-2013 for the purpose of identification of beneficial ownership of the client.

2. Company registers client by obtaining the Client Registration Form / KYC form which is foremost requirement for any intermediary. In this form the basic details of the clients are obtained.

3. No account is opened in a fictitious / benami name or on an anonymous basis. Further, following documentary evidences shall be obtained before registering client(s) as a part of KYC form.

Proof of Identity (POI): -

a. Unique Identification Number (UID) (Aadhaar)/ Passport/ Voter ID card/ Driving license.

b. PAN card with photograph.[Pan No. must be verified from Income Tax Web Site]

c. Identity card/ document with applicant's Photo, issued by any of the following: Central/State Government and its Departments, Statutory/Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions, Colleges affiliated to Universities, Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members; and Credit cards/Debit cards issued by Banks.

Proof of Address (POA): -

(*Documents having an expiry date should be valid on the date of submission.)

1. Passport/ Voters Identity Card/ Ration Card/ Registered Lease or Sale Agreement of Residence/ Driving License/ Flat Maintenance bill/ Insurance Copy.
2. Utility bills like Telephone Bill (only land line), Electricity bill or Gas bill - Not more than 3 months old.
3. Bank Account Statement/Passbook -- Not more than 3 months old.
4. Self-declaration by High Court and Supreme Court judges, giving the new address in respect of their own accounts.
5. Proof of address issued by any of the following: Bank Managers of Scheduled Commercial Banks/Scheduled Co-Operative Bank/Multinational Foreign Banks/Gazetted Officer/Notary public/Elected representatives to the Legislative Assembly/Parliament/Documents issued by any Govt. or Statutory Authority.
6. Identity card/document with address, issued by any of the following: Central/State Government and its Departments, Statutory/Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions, Colleges affiliated to Universities and Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members.
7. For FII/sub account, Power of Attorney given by FII/sub-account to the Custodians (which are duly notarized and/or apostiled or consularised) that gives the registered address should be taken.
8. The proof of address in the name of the spouse or as allowed under SEBI circular / Exchange guideline may be accepted.

In case of Non-Individuals, additional documents to be provided by non-individuals, over & above the aforesaid POI & POA, as specified by SEBI and provided in KYC form or having regard to the requirement to the Prevention of Money Laundering Act 2002 from time to time etc.

4. Factors of risk perception (in terms of monitoring suspicious transactions) of the client are clearly defined having regard to clients' location (residential / office, permanent or correspondence address and other addresses if applicable), nature of business activity, income / networth, trading experience etc. The parameters should 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 KYC profile.
5. It shall be ensured that an account is not opened where it is unable to apply appropriate clients due diligence measures / KYC policies. This may be applicable in cases where it is not possible to ascertain the identity of the client, information provided to the intermediary is suspected to be non genuine, perceived non cooperation of the client in providing full and complete information. KIFS shall not continue 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. KIFS shall be cautious to ensure that it does not return securities of money that may be from suspicious trades. However, KIFS shall consult the relevant authorities in determining what action it shall take when it suspects suspicious trading.
6. Normally the client account will not be permitted to be operated by another person / entity. However, if the client has given express authority i.e. Power of Attorney / written mandate / consent in favor of such another person / entity then the same may be allowed subject to receiving necessary proofs of identification and address of such POA holder or mandate holder. In case of non individual clients, their accounts may be operated by their authorized partners / trustees / directors / managers as per the resolution / authority submitted.
7. In case of politically exposed persons, based on the information available in public domain at the time of client registration process or afterwards, the senior staff of KIFS check and verify the data available in public domain so as to verify whether the client is politically exposed person or not. In such cases, approval of senior management shall be obtained before registering such clients.
8. Proper RMS system shall be implemented from time to time, so as to verify and establish system of acceptance of proper documents / information / sources etc.
9. Proper checks is been established to check and verify that no further transactions can be carried out by the SEBI debarred or entities debarred / banned by such other statutory authorities can be prevented.
10. Additional due diligence to be exercised in case of the **Clients of Special Category (CSC)** which include but not limited to :-

- a. Non resident clients
- b. High networth clients (i.e the clients having networth exceeding 200 Lakhs and doing the intra day trading volume of more than 2 Crore and daily delivery volume more than Rs. 50 Lakhs)
- c. Trust, Charities, NGOs and organizations receiving donations
- d. Companies having close family shareholdings or beneficial ownership
- e. Politically exposed persons (PEP) of foreign origin
- f. Current / Former Head of State, Current or Former Senior High profile politicians and connected persons (immediate family, Close advisors and companies in which such individuals have interest or significant influence)
- g. Companies offering foreign exchange offerings
- h. 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 centres, tax havens, countries where fraud is highly prevalent. For this purpose, establish direct or indirect access to http://www.un.org/sc/committees/1267/aq-sanctions_list.shtml and <http://www.un.org/sc/committees/1988/list.shtml> etc.
- i. Non face to face clients
- j. Clients with dubious reputation as per public information available etc.
- k. Such Other persons who as per our independent judgment may be classified as CSC.

Further, KIFS may rely upon third party for carrying out Client Due Diligence (CDD) 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 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 record keeping requirements in line with obligations under PML Act as also subject to conditions that are specified in Rule 9 of PML Rules and shall be in accordance with regulations and circulars/guidelines issued by SEBI from time to time.

Implementation of Procedure laid down in the Unlawful Activities (Prevention) Act (UAPA) Order dated August 27, 2009 :

- ✓ KIFS shall at the time of opening an account check the details of prospective clients in the updated list of individuals and entities which are subject to various measures such as freezing of assets / accounts, denial of financial services etc.
- ✓ The said list is been approved by the Security Council Committee established pursuant to various United Nations' Security Council Resolutions (UNSCRs) and can be accessed at its website at <http://www.un.org/sc/committees/1267/consolist.shtml>.
- ✓ KIFS shall ensure that accounts are not opened in the name of anyone whose name appears in said list.
- ✓ KIFS shall also 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 said list.
- ✓ In case any client either existing or prospective is found in the said list then full details of accounts bearing resemblance with any of the individuals/entities in the list shall immediately be intimated to SEBI and FIU-IND.
- ✓ Further, SEBI / Exchange(s) also forward such list upon receipt of the same from Ministry of External Affairs (MHA)
- ✓ KIFS shall ensure that No person from the such list is holding any funds, financial assets or economic resources or related services in the form of securities with it.
- ✓ In the event, particulars of any of customer/s match the particulars of designated individuals/entities as mentioned above, KIFS shall immediately, not later than 24 hours from the time of finding out such customer, inform full particulars of the funds, financial assets or economic resources or related services held in the form of securities, held by such customer on its books to the Joint Secretary (IS.I), Ministry of Home Affairs, at Fax No.011-23092569 and also convey over telephone on 011-23092736. The particulars apart from being sent by post should necessarily be conveyed through e-mail at jsis@nic.in.

- ✓ KIFS shall also send the particulars of the communication as mentioned above through post/fax and through e-mail (sebi_uapa@sebi.gov.in) to the UAPA nodal officer of SEBI, Officer on Special Duty, Integrated Surveillance Department, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C4-A, “G” Block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051 as well as the UAPA nodal officer of the state/UT where the account is held, as the case may be, and to FIU-IND.
- ✓ In case the aforementioned details of any of the customers match the particulars of designated individuals/entities beyond doubt, KIFS would prevent designated persons from conducting financial transactions, under intimation to Joint Secretary (IS.I), Ministry of Home Affairs, at Fax No. 011-23092569 and also convey over telephone on 011-23092736. The particulars apart from being sent by post should necessarily be conveyed through e-mail at jsis@nic.in.
- ✓ KIFS shall also file a Suspicious Transaction Report (STR) with FIU-IND covering all transactions in the accounts carried through or attempted, as per the prescribed format.

KYC Documents etc.:

KIFS shall obtain proper KYC documents prior to transaction with clients as may be prescribed. Trading in securities market involves risks of various nature. Therefore as a part of Clients’ awareness, KIFS has made such a policy, RDD, Rights and Obligations, Guidance Notes, AML Literature, Caution for investors, RMS policy and such other documents/guidelines whether forming part of KYC form or otherwise and published the same on its website www.kifstradecapital.com.

Risk Categorisation at the time of account opening:

Category	Particulars
Low Risk	face to face clients, clients forwarded by branches / sub-brokers, authorised person, clients introduced by existing face to face clients
Medium Risk	clients introduced by existing but non-face to face clients
High Risk	Non-resident Clients, Client of Special Categories as mentioned in clause 10 above

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

Risk Category	CM Segment	Derivatives Segment	Payment Mechanism
Low Risk	Average daily turnover < Rs. 50 Lacs or net settlement obligation < Rs. 5 Lacs	Average daily turnover < Rs. 100 Lacs	Regular payment through A/c payee cheque from the Bank A/c already mapped with us
Medium Risk	Average daily turnover > Rs. 50 Lacs but < Rs. 200 Lacs or net settlement obligation > Rs. 5 Lacs but < Rs. 10 lacs	Average daily turnover > Rs. 100 lacs but < Rs. 500 Lacs	Payment through A/c payee cheque from the Bank A/c other than one already mapped with us
High Risk	HNI Clients having average daily turnover of > Rs. 200 Lacs or net settlement obligation of > Rs. 50 lacs	HNI Clients having average daily turnover of > Rs. 500 Lacs	Payment through Banker`s Cheque / Demand Draft / NEFT / RTGS etc.

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

modes as may be approved by RBI shall also be maintained and should be made available to competent authorities and self regulatory bodies as and when required.

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

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

RECORD KEEPING AND RETENTION OF RECORDS:

KIFS shall maintain and preserve such records as may be required to ensure compliance with record keeping requirements contained in the SEBI Act, 1992, rules and regulations made there-under, PMLA Act and such other relevant legislations, rules, regulations etc. This would inter-alia enable to provide adequate information related to beneficial ownership of the account, volume of fund flows generated through the account, origin and form of funds, person's identity, destination of funds, nature of transactions, amount and currency of transactions, date of transactions, parties to transactions and such other relevant information and KIFS shall made available such relevant information to competent investigating authorities in a timely manner as and when asked for. KIFS shall also preserve all relevant records at-least for the minimum period prescribed under the SEBI Act. Further, the records mentioned in Rule 3 of PML rules shall be preserved at least for a period prescribed in PMLA-2002, SEBI Act, 1992 and other legislations, Regulations or exchange bye-laws or circulars. In case of on-going investigations or transactions which have been subject of a suspicious transaction reporting, the same shall be retained until it is confirmed that the case has been closed.

Thus, the records pertaining to transactions of clients shall be maintained for a period of 5 years or such other period as may be directed by SEBI and other competent authority(ies). The records pertaining to identity of clients and BOs (such as copies of passport, identity cards, driving license or similar documents) as well as account files and business correspondence shall be maintained and preserved for a period of 5 years after the business relationship between clients and KIFS has ended or the account has been closed, whichever is later. Further, the record of information related to transactions whether attempted or executed as may be reported to Director-FIU IND shall be maintained and preserved for a period of 5 years for the date of transactions between clients and KIFS.

SUSPECIOUS TRANSACTION MONITORING AND REPORTING:

Appropriate and adequate steps shall be implemented to enable suspicious transactions' recognition. The compliance department or such other person entrusted to handle the task, shall randomly examine a selection of transaction undertaken by clients to comment on their nature i.e. whether they are in the suspicious transactions or not. KIFS shall pay special attention to all complex unusually large transactions / patterns which appear to have no economic purpose. And as per our observations, if any transaction of suspicious nature is identified it must be brought to the notice of the superior / Head of the Department for ultimate reporting by Principal Officer to submit report to the FIU-IND if required. However, it should be ensured that there is continuity in dealing with the client as normal until told otherwise and the client shall not be told of the report/suspicion. In exceptional circumstances, consent may not be given 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 shall act as a central reference point in facilitating and co-operating with competent investigating authority. Additionally, KIFS shall appoint Designated Director as defined in terms of Rule 2(ba)

of PML Rules who shall be either Managing Director or Whole Time Director so as to ensure overall compliance with the obligation imposed under Chapter IV of PMLA Rules. Any changes either in Principal Officer or Designated Director shall be intimated to FIU-IND and other competent authority(ies) in prompt manner.

Policy for Recruitment of personnel

The HR Department is instructed to cross check all the references and should take adequate safeguards to establish the authenticity and genuineness of the persons before recruiting. The department should obtain necessary documents such as Photographs, Proof of address, Identity proof, Proof of Educational Qualification, References etc.

Periodic Training or as per the requests of employees on case to case basis, shall be imparted to employees in front office, back-office, compliance division, RMS division, account opening staff etc. so as to adequately train them in AML and CFT procedures.

Investors' Education :

Implementation of AML/CFT measures requires back office and trading staff to demand 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. This can sometimes lead to raising of questions by the customer with regard to the motive and purpose of collecting such information. There is, therefore, a need for the back office and trading staff to sensitize their customers about these requirements as the ones emanating from AML and CFT framework. In order to address such a situation, KIFS has inserted a voluntary documents for general guidance of the clients so as to educate the clients/customers of the objectives of the AML/CFT programme.

Any of the aforesaid notice, doubts, non-compliances, suspicion, etc. must be notified to immediately to the Principal Officer for further reporting and such other actions as may be statutorily fit and proper.

Under no circumstances the requirements in this policy shall be violated by anyone concerned in the offices, branch offices of KIFS Trade Capital Private Limited or those associated as sub-brokers, authorised persons with KIFS. Head of the departments/branches are requested to issue suitable directions, based on the above policy/guidelines, to all concerned. They are also requested to educate the staff concerned the contents in this policy letter and give instruction for the strict compliance. Head of the departments/branches shall be made accountable for non compliance and personnel responsible for infringement shall be strictly warned/proceeded against appropriately.

Note : This policy has been reviewed in terms of SEBI's circular no. SEBI/HO/MIRSD/DOS3/CIR/P/2018/104 dated 04/07/2018 by Board of Directors of KIFS Trade Capital P. Ltd. (Earlier KIFS Securities Pvt. Ltd.) during its meeting held on 26th July, 2018 and is being circulated to all concerned for compliance of the same.