



Bhogilal Trikamlal Securities Pvt. Ltd.

MEMBER: BSE LTD. & NSE LTD.

R-717/721, Rotunda Bldg., B. S. Marg, Fort, Mumbai - 400 023. || Tel.: 2272 1907 • Fax: 2272 2966

INSIDER TRADING, ANTI MONEY LAUNDERING POLICIES & PMLA

IDENTIFYING IRREGULAR & INSIDER TRADING

- Sudden substantial increase in activity or transaction with no apparent economic rationale.
- Sudden substantial activity in dormant account or in a particular script.
- Client transferring large sum of money.

REGISTRATION OF NEW CLIENTS & DUE DELIGENCE MEASURES

- Clearly establishing identity of clients, verify PAN & other documents with originals.
- Know introducer.
- Before opening any new account, it shall be ensured that the name/s of the proposed customer does not appear in the list on the below mentioned site. We shall continuously scan all existing account to ensure that no account is held by or linked to any of the entities or individuals included in the list. Full details of account bearing resemblance with any of the individuals/entities in the list should immediately be intimated to SEBI and FIU-IND. Nations website at <http://www.un.org/sc/committees/1267/consolist.shtml>

EXISTING CLIENTS & DUE DELIGENCE MEASURES

- Obtaining annual financial data.

MAINTENANCE /MONITORING OF SUSPICIOUS TRANSACTION / ROLE OF THE INTERNAL AUDITORS

- Sudden substantial increase in activity or transaction with no apparent economic rationale.
- Sudden substantial activity in dormant account or in a particular script.
- Client transferring large sum of money to or from overseas account.
- The Principal Officer/Money Laundering Control Officer and other appropriate compliance, risk management and related staff members shall have timely access to customer identification data and other CDD information, transaction records and other relevant information.
- 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 Exchange/FIU-IND/Other relevant Authorities, during audit, inspection or as and when required. These records would be preserved for ten years as is required under PMLA 2002.

- Categorizing client 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 'Clients of Special Category'. Such clients would 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 transaction, and applying enhanced due diligence while expanding business relationships with the identified country or persons in that country etc.
- File STR if we have reasonable grounds to believe that the transaction involves proceeds of crime.

REPORTING OF SUSPECIOUS TRANSACTION

- Any report generated from above monitoring.
- Escalation through the organization to the principal officer & who in turn report FIU.
- Confidentially & retention of reports.
- The Principal Officer shall have* access to and be able to report to senior management above his/her next reporting level or the Board of Directors.”

“to protect the interests of investors in securities and to promote the development of, and to regulate the securities market.”