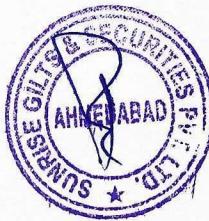




SUNRISE GILTS & SECURITIES PVT. LTD.

ANTI MONEY LAUNDERING (AML) & PMLA POLICY

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ANTI MONEY LAUNDERING (AML) & PMLA POLICY

1. Background:

The Prevention of Money Laundering Act, 2002 (PMLA) and the Rules framed thereunder, require intermediaries registered with SEBI to implement a policy framework for prevention of money laundering and terrorist financing.

SEBI has issued guidelines from time to time for compliance with PMLA, which are applicable to all stock brokers.

Sunrise Gilts & Securities Pvt. Ltd. is committed to complying with all applicable provisions of PMLA and SEBI guidelines.

2. Objective of the Policy:

The objective of this policy is:

- To prevent the Company from being used for money laundering or terrorist financing.
- To ensure proper Customer Due Diligence (CDD).
- To monitor, detect and report suspicious transactions.
- To comply with all regulatory obligations under PMLA.

3. What is Money Laundering:

Money Laundering can be defined as engaging in financial transactions that involve income derived from criminal activity, transactions designed to conceal the true origin of criminally derived proceeds and appears to have been received through legitimate sources/origins.



This is done in three phases:

- Placement Phase;
- Layering Phase; and
- Integration Phase.

4. Prevention of Money Laundering Act, 2002:

Prevention of Money Laundering Act, 2002 (PMLA 2002) forms the core of the Legal Framework put in place by India to combat Money Laundering. PMLA 2002 and the Rules notified there under came into force with effect from July 1, 2005.

The PMLA 2002 and Rules notified there under impose an obligation on intermediaries (including stock brokers and sub-brokers) to verify identity of clients, maintain records and furnish information to the Financial Intelligence Unit (FIU) – INDIA.

Financial Intelligence Unit (FIU) – INDIA

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

FIU-IND has been established as the Central National Agency responsible for receiving, processing, analyzing and disseminating information relating to Suspect Financial Transactions. FIU-IND is also responsible for coordinating and stretching efforts of national and international intelligence and enforcement agencies in pursuing the global efforts against money laundering and related crimes.

Sunrise Gilts and Securities Private Limited has resolved that it would, as an internal policy, take adequate measures to prevent Money Laundering and shall put in place a framework to report cash and suspicious transactions to FIU as per the Guidelines of PMLA Rules, 2002.

5. Implementation of this Policy and Designation of Principal Officer:

The Company shall designate a **Principal Officer** who shall be responsible for:

- Compliance of the provisions of the PMLA and AML Guidelines act as a central reference point and play an active role in identification & assessment of potentially Suspicious Transactions; and



- Overall compliance of PMLA.
- Reporting suspicious transactions to FIU-IND. To ensure that Sunrise Gilts & Securities Pvt. Ltd. discharges its legal obligation to report Suspicious Transactions to the concerned authorities.
- Acting as the nodal point for regulators.

The Principal Officer shall be a senior official of the Company.

6. Customer Due Diligence (CDD):

The main aspect of this policy is to report about the client in order to identify who is the actual:

- a. Beneficial owner of the securities or on whose behalf transaction is conducted;
- b. Verify the customer's identity using reliable, independent source document, data or information; and
- c. Conduct on-going due diligence and scrutiny of the account/client to ensure that the transaction conducted are consistent with the client's background/financial status, its activities and risk profile.

The Customer Due Diligence Process includes three specific parameters:

1. Policy for Acceptance of Clients;
2. Client Identification Procedure; and
3. Suspicious Transaction identification and reporting.

Customer Acceptance Policy:

Each client should be met in person. Either the client should visit the office/branch or concerned official may visit the client at his residence/office address to get the necessary documents filed in and signed. Preferably accept clients who live within the jurisdiction of the branch. As far as possible, ensure that the new client is introduced by an existing client.

Obtain complete information from the client. It should be ensured that the initial forms taken by the client are filled in completely. All photocopies submitted by the client are



checked against original documents without any exception. Ensure that the 'Know Your Client' Guidelines are followed without any exception. All supporting documents as specified by Securities and Exchange Board of India (SEBI) and Exchanges are obtained and verified.

Do not accept clients with identity matching persons known to have criminal background. Check whether the client's identify matches with any person having known criminal background or is not banned in any other manner, whether in terms of criminal or civil proceedings by any enforcement/regulatory agency worldwide.

Sunrise Gilts and Securities Private Limited is very careful while accepting clients of special category like NRIs, HNIs, Trust, Charities, NGOs, Politically Exposed Persons (PEP), persons of foreign origin, companies having closed share holding/ownership, companies dealing in foreign currency, shell companies, overseas entities, clients in high risk countries, non face to face clients, clients with dubious background. Current/Former Head of State, Current/Former Senior High-profile Politician, Companies offering Foreign Exchange, etc. or clients from High-risk Countries like Libya, Pakistan, Afghanistan, etc. or clients belonging to Countries where corruption/fraud level is high like Nigeria, Burma,etc. Scrutinize minutely the records/documents pertaining to clients belonging to aforesaid category.

The Company also ensures that no account is being opened in a fictitious/benami name or on an anonymous basis.

Client's account should be opened only on receipt of mandatory information along with authentic supporting documents as per the Regulatory Guidelines. Do not open the accounts where the client refuses to provide information/documents and we should have sufficient reason to reject the client towards this reluctance.

Customer Identification Procedure (FOR NEW CLIENTS):

Objective:

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

Documents which can be relied upon:



1. PAN Card;
2. Identity Proof; and
3. Address Proof

Documents to be obtained as part of customer identification procedure for new clients
[Refer Page No. 8 & 9 of KYC]

Risk Profiling of the Client:

We should accept the clients based on the risk they are likely to pose. The aim is to identify clients who are likely to pose a higher than average risk of money laundering or terrorist financing. For this purpose, we need to classify the clients as low risk, medium risk and high risk clients. By classifying the clients, we will be in a better position to apply appropriate customer due diligence process. That is, for high risk client we have to apply higher degree of due diligence. The factors of risk perception depend on client's location, nature of business activity, turnover, nature of transaction, manner of payment etc.

In order to achieve this objective, all clients of the branch should be classified in the following category:

Category A – Low Risk; Category B – Medium Risk and Category C – High Risk.

Category A clients are those who pose low or nil risk. They are good Corporate/HNIs who have a respectable social and financial standing. These are the clients who make payment on time and take delivery of shares.

Category B clients are those who are intra-day clients or speculative clients.

Category C clients are those who have defaulted in the past, have suspicious background, do not have any financial status, etc.

Therefore, we have to be careful while monitoring the transactions of B and C category clients. Apart from this, we need to exercise extra caution while monitoring the transactions of NRI/NRE/PIO and foreign clients, especially when the payment is being made in foreign currency.

Any change in the risk profile of the client/mandate holder, has to be ascertained by the concerned branch officials and reported to the Business Head immediately.



Suspicious Transaction Reporting (STR):

Any transaction which appears suspicious shall be:

- Examined by the Compliance / Principal Officer.
- Reported to FIU-IND in STR format within prescribed timelines.
- Maintained in strict confidentiality.

All are requested to analyze and furnish details of suspicious transactions, whether or not made in cash. It should be ensured that there is no undue delay in analysis and arriving at a conclusion.

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

- Gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
- Appears to be made in circumstance of unusual or unjustified complexity; or
- Appears to have no economic rationale or bona fide purpose.

Reasons for Suspicious (Identity of client):

- False identification documents;
- Identification documents which could not be verified within reasonable time;
- Non-face to face client;
- Clients in high-risk jurisdiction;
- Doubt over the real beneficiary of the account;
- Accounts opened with names very close to other established business entities; and
- Receipt back of well-come kit undelivered at the address given by the client.

Suspicious Background:

- Suspicious background or links with criminals.

Multiple Accounts:

- Large number of accounts having common parameters such as common partners/directors/promoters/address/email address/telephone numbers introducer or authorized signatory; and



- Unexplained transfers between such multiple accounts.

Activity in Accounts:

- Unusual activity compared to past transactions;
- Use of different accounts by client alternatively;
- Sudden activity in dormant accounts;
- Activity inconsistent with what would be expected from declared businesses; and
- Account used for circular trading.

Nature of Transactions:

- Unusual or unjustified complexity;
- No economic rationale or bonafied purpose;
- Source of funds are doubtful;
- Appears to be case of insider trading;
- Purchases made on own account transferred to a third party through an off market transactions through DP account;
- Transactions reflect likely market manipulations; and
- Suspicious off market transactions.

Value of Transactions:

- Value just under the reporting threshold amount in an apparent attempt to avoid reporting;
- Large sums being transferred from overseas for making payments;
- Inconsistent with the clients apparent financial standing;
- Inconsistency in the payment pattern by the client; and
- Block deal which is not at market price(s) appear to be artificially inflated/deflated.

What to Report:

1. Nature of the transactions;
2. The amount of the transaction and the currency in which it was denominated;
3. The date on which the transaction was conducted;
4. The parties to the transaction; and
5. The reason of suspicion.

7. Record Keeping:



The Company shall maintain:

- Transaction records for minimum **5 years**.
- KYC and internal records.
- STR and related investigation records.

8. Training & Awareness:

The Company shall:

- Provide periodic training to employees.
- Sensitize staff on AML risks.
- Circulate regulatory updates.

9. Confidentiality:

All information related to STR and internal AML processes shall be treated as **confidential** and shall not be disclosed to any person except regulators.

10. Internal Control & Audit:

- AML compliance shall be reviewed during system audits.
- Internal audit shall verify implementation.
- Gaps shall be rectified immediately.

11. Policy Review:

This policy shall be reviewed annually or upon regulatory or system changes.

12. Approval:

This policy is approved by the Directors of Sunrise Gilts & Securities Pvt. Ltd.

