M/S NOKHA COMMODITY SERVICES

Member : National Commodity & Derivatives Exchange,
Member : Multi Commodity Exchange of India Limited
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Mo. No. 9414147141, 9414416642
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Near Navali Gate,
Bikaner Road,
Nokha-334803
Bikaner (Rajasthan)

Ref :-

PMLA POLICY

Policy reviewed by	**:**	**Principal Officer**
Approval Authority	**:**	**Partner**
Last reviewed on	**:**	**24-07-2020**
Policy reviewed and approved on	**:**	**11.03.2015**
Periodicity of Review	**:**	**From time to time as per requirement**
Officer responsible for implementation	**:**	**Compliance Officer & Principal officer**

INTRODUCTION

1. Policy Objective

Nokha Commodity Services had designed this Policy to prohibit and to prevent the money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities or flow of illegal money or hiding money to avoid paying taxes. To discourage and identify any Money Laundering and/or Terrorist Financing Activities. This Policy provides a detailed account of the procedures and obligations to be followed to ensure compliance with issues related to Know your Client (KYC) Norms, Anti Money Laundering (AML), Client Due Diligence (CDD) and Combating Financing of Terrorism (CFT). This Policy specifies the additional disclosures to be made by the clients to address concerns of Money Laundering and Suspicious transactions undertaken by clients and reporting to Finance Intelligent Unit (FIUIND).

2. Purpose

The Guidelines as outlined below provides a general background on the subjects of money laundering and terrorist financing summarizes the main provisions of the applicable anti-money Laundering and anti-terrorist financing legislation in India and provides guidance on the practical Implications of the Act. The Guidelines sets out the steps that Nokha Commodity Services and/or any of its representatives should follow to discourage and identify any money laundering or terrorist financing activities.

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

(a) 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, both in India & Overseas;

(b) Customer acceptance policy and customer 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 policies, procedures, and controls relating to prevention of money laundering and terrorist financing, 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 about their responsibilities in this regard, through Whistle Blower Policy.

4. Designated Director

Designated Director/Partner for Nokha Commodity Services Mr. Bhagirath Jhanwar to ensure overall compliance with the obligations imposed under Chapter IV of the PML Act 2002 and Rules thereof, as amended from time to time.

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5. Principal Officer

Principal Officer for Nokha Commodity Services is Mr. Om Prakash Mundhra to:

• Ensure that any incidents of suspicious activity are reported to the Financial Intelligence Unit India(FIU-IND) and are filed in accordance with the applicable legislation;

• Maintenance of a register listing reports made to the Financial Intelligence Unit-India (FIU-IND)and inquiries received from the Financial Intelligence Unit-India (FIU-IND)

6. Suspicious Activity Reporting

All employees of Nokha Commodity Services are required to be familiar with its anti-money laundering procedures and immediately report to the Principal Officer and/or Designated Director the occurrence of any suspicious activity. In the event that an employee of Nokha Commodity Services receives any enquiry from a law enforcement agency, that inquiry shall immediately be referred to the Principal Officer and/or Designated Director/ Partner.

If the Principal Officer and/or Designated Director/ Partner determine that a report should be filed, he will file the report as soon as possible. In the event that the Principal Officer and/or Designated Director perceives an urgency in filing the report, initial notification shall be made by telephone, facsimile or e-mail, with written notification on the form to follow. The address of Director FIU is as given below:

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

Copies of all reports submitted to the Financial Intelligence Unit-India (FIU-IND) will be maintained by the Nokha Commodity Services, for not less than five years.

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7. Tipping Off

Reports and all supporting documentation are confidential. Directors, Officers and Employees are prohibited from disclosing to anyone, including persons involved in the transaction, information in connection with a filing. Violation of this policy may result in disciplinary action including, but not limited to, monetary fines or termination of employment.

8. Additional Considerations

There are additional anti-money laundering precautions that need to be taken into consideration, Nokha Commodity Services ensures:-

• The Anti-Money Laundering systems and procedures for compliance with the Regulations are audited (where applicable);

• Implementation and monitoring of the day-to-day operations and internal controls of the anti-money laundering program;

• Reporting to the Proprietor on anti-money laundering compliance;

• Being aware of changes in the laws described above, new regulations that address money laundering, and understanding how they apply to Nokha Commodity Services;

• Reflecting in the supervisory policies and procedures of Nokha Commodity Services applicable changes in the law, reporting rules, and industry best practices and;

• Annual review of client information

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IDENTITY OF APPLICANT FOR BUSINESS – CLIENT IDENTIFICATION

1. Establishing a Client Relationship

Nokha Commodity Services has an obligation to determine, to the best of its ability, that money-laundering activities are not being conducted through the organization. The first line of defense against any money laundering activity is to KNOW THE CLIENT.

2. Anti-Money Laundering Procedures

Nokha Commodity Services shall adopt written procedures to implement the anti-money laundering provisions as envisaged under the Prevention of Money Laundering Act, 2002. Such procedures should include inter alia, the following three specific parameters which are related to the overall 'Client Due Diligence Process':

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

3. Client Due Diligence [CDD]

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;

(d) Verify the identity of the beneficial owner of the client and/or the person on whose behalf the 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.

4. Reliance on third party for carrying out Client Due Diligence (CDD)

Nokha Commodity Services shall rely on a third party for the purpose of:

(a) Identification and verification of the identity of a client;

(b) For determining whether the client is acting on behalf of a beneficial owner;

(c) For 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 the obligations under the PML Act.

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. Nokha Commodity Services shall be responsible for CDD and undertaking enhanced due diligence measures, as applicable.

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5. Policy for acceptance of clients

The following safeguards are to be followed while accepting the clients:

New Clients
CATEGORY: CSC & NOT CSC
RISK BASED APPROACH: HIGH, MEDIUM & LOW

Identity of client, verification of addresses, phone number(s), Bank A/c & other details Whether account is not opened in a fictitious / benami name or on an anonymous basis. 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 as prescribed. Whether securities are beneficially owned by entity other than the client & sufficient information is obtained in order to identify persons who beneficially own or control securities account.

Verification of original documents:
Whether 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.
Whether the client has any criminal background i.e. whether he has been at any point of time involved or associated in any civil or criminal proceedings of any nature. Whether at any point of time the client has been banned from trading in the stock market. The CDD process shall necessarily be revisited when there are suspicions of money laundering or financing of terrorism.

Existing Clients:
RISK BASED APPROACH: HIGH, MEDIUM& LOW
Review of KYC details in context to the requirements under the Act.
Details regarding Annual Financial Statements (In case of non Individuals)
Information about the directors, partners, dominant promoters, major shareholders (In case of non-individuals)

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6. Clients of Special Category (CSC)

Such clients 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). Politically exposed persons 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.

(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 centers, tax havens, countries where fraud is highly prevalent.

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(i) Non face to face clients

(j) Clients with dubious reputation as per public information available etc.
The above mentioned list is only illustrative and Nokha Commodity Services will exercise independent judgment to ascertain whether new clients should be classified as CSC or not.

7. Restricted Relationships

While conducting the risk assessment of a potential client, Nokha Commodity Services may decline the business altogether or refuse to enter into correspondent business relationship with a shell Financial Institution and/or banks including Clients of Special Category as mentioned in clause 6 above belonging to such countries which are unregulated or least regulated.

Nokha Commodity Services shall 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 http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml andhttp://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.

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8. Client Identification Procedure

The KYC policy shall clearly spell out the Client Identification Procedure to be carried out at different stages i.e. while establishing the intermediary – client relationship, while carrying out transactions for the client or when the intermediary has doubts regarding the veracity or the adequacy of previously obtained client identification data.

Nokha Commodity Services complies with the following requirements while putting in place a Client Identification Procedure (CIP):

(a) Nokha Commodity Services shall proactively put in place appropriate risk management systems to determine whether the client or potential client or the beneficial owner of such client is a politically exposed person [PEP]. Such procedures shall include seeking relevant information from the client, referring to publicly available information or accessing the commercial electronic databases of PEPS. Further, the enhanced CDD measures as outlined in clause 3 shall also be applicable where the beneficial owner of a client is PEP.

(b) Nokha Commodity Services obtains senior management approval for establishing business relationships with PEPs. Where a client has been accepted and the client or beneficial owner is subsequently found to be, or subsequently becomes a PEP, Nokha Commodity Services shall obtain senior management approval to continue the business relationship.

(c) Nokha Commodity Services shall take reasonable measures to verify the sources of funds as well as the wealth of clients and beneficial owners identified as PEP".

(d) The client shall be identified by Nokha Commodity Services by using reliable sources including documents / information. Nokha Commodity Services shall obtain adequate information to satisfactorily establish the identity of each new client and the purpose of the intended nature of the relationship.

(e) The information is adequate enough to satisfy competent authorities (regulatory / enforcement authorities) in future that due diligence was observed by Nokha Commodity Services in compliance with the directives. Each original document shall be seen prior to acceptance of a copy.

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(f) Failure by prospective client to provide satisfactory evidence of identity shall be noted and reported to the higher authority within Nokha Commodity Services. Nokha Commodity Services shall comply with the guidelines on Identification of Beneficial Ownership of its clients, as specified by the regulator/regulators from time to time and shall identify the beneficial owner(s) and take all necessary steps to verify their identity. Requirements as laid down in PML Rule 9 shall also be complied with in CIP.

(g) Almost Clients of Nokha Commodity Services are personally known to our Management. Nokha Commodity Services generally deals with friend and relatives of management. Mostly clients Nokha based. Our management personally meets the clients periodically. Always our clients are in touch with us.

9. Safeguard Measures

The following safeguards are to be followed while accepting the clients:

(a) Ensures that an account is not opened, where the employees are not able 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 us is suspected to be non-genuine, perceived non-cooperation of the client in providing full and complete information.

(b) Shall not continue to do business with such a person and file a suspicious activity report. It should also evaluate whether there is suspicious trading in determining in whether to freeze or close the account.

(c) Shall be cautious to ensure that it does not return securities of money that may be from suspicious trades. However, we should consult with the concerned authorities in determining what action it should take when it suspects suspicious trading.

(d) The obligations to be followed by us to ensure the effective and expeditious implementation of Order of the Central Government detailing procedure for implementation of Section 51A of the Unlawful Activities (Prevention) Act, 1967 has been issued vide SEBI Circular ref. no:
ISD/AML/CIR-2/2009 dated October 23, 2009, which needs to be complied with scrupulously.

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10. Maintenance of Records of Transactions

We shall put in place a system of maintaining proper record of transactions prescribed under Rule 3of The Prevention of Money Laundering (Maintenance of records & Time for furnishing of information by Banking companies, Financial Institutions and Intermediaries) Rules, 2005, as mentioned below:

- All cash transactions of the value of more than Rs 10 lakh or its equivalent in foreign currency.
- All series of cash transactions integrally connected to each other which have been valued below Rs10 lakhs or its equivalent in foreign currency where such series of transactions take place within one month and the aggregate value of such transactions exceeds Rupees 10 Lakhs.
- All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place;
- All suspicious transactions whether or not made in cash and including, inter-alia, credits or debits into, from any non-monetary account such as demat account, security account maintained by us. It may, however, be clarified that for the purpose of suspicious transactions reporting, apart from transactions integrally connected', 'transactions remotely connected or related' should also be considered.

11. Record Keeping

Nokha Commodity Services shall ensure compliance with the record keeping requirements contained in the PMLA as well as other relevant legislation, Rules, Regulations, Exchange Bye-laws and Circulars and of the regulators.

Nokha Commodity Services shall maintain 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.

Nokha Commodity Services shall retain the following information for the accounts of customers 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

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(c) for selected transactions:
• the origin of the funds;
• the form in which the funds were offered or withdrawn, e.g. cheques, demand drafts etc.;
• the identity of the person undertaking the transaction;
• the destination of the funds;
• the form of instruction and authority.

We shall consider retaining certain records, e.g. customer identification, account files, and business correspondence, for periods which may exceed the limit required under the SEBI Act, Prevention of Money Laundering Act,2002 , Exchange bye-laws or any other Act or circulars for the time being in force.

12. Information to be maintained

Nokha Commodity Services shall maintain and preserve the following information in respect of transactions referred to in Rule 3 of PMLA Rules:
• the nature of the transactions;
• the amount of the transaction and the currency in which it denominated;
• the date on which the transaction was conducted; and
• the parties to the transaction.

13. Retention of Records

All necessary records on transactions, both domestic and international, should be maintained at least for the minimum period prescribed under the relevant Act such as Prevention of Money Laundering Act, 2002, Prevention of Money-laundering (Maintenance of Records) Rules, 2005(PML Rules), and SEBI Act, 1992 and other legislations, Regulations or exchange bye-laws or circulars amended from time to time. The following document retention terms should be observed:

(a) Nokha Commodity Services shall maintain and preserve the record on Client identification (e.g., copies or records of official identification documents like passports, identity cards, driving licenses or similar documents) account files and business correspondence should be kept for the period of five years (5)from the date of cessation of relationship with client.

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(b) Records evidencing the identity of the Clients and Beneficial Owners as well as account files and business correspondence shall be maintained and preserved for a period of five years (5) from the date of cessation of the transaction.

(c) All necessary records of transactions referred in Clause 9 of Part B above, both domestic and international, should be maintained for at least for the minimum period of five years (5) from the date of cessation of the transaction.

(d) Nokha Commodity Services shall maintain and preserve the record of information related to transactions, whether attempted or executed, which are reported to the Director, FIU-IND, as required under Rules 7& 8 of the PML Rules, for a period of five years (5) from the date of the transaction between the Client and Nokha Commodity Services .

(e) In situations where the records relate to on-going investigations or transactions which have been the subject of a suspicious transaction reporting, they should be retained until it is confirmed that the case has been closed.

14. Monitoring of Transactions

(a) Regular monitoring of transactions is vital for ensuring effectiveness of the Anti-Money Laundering procedures.

(b) Special attention to all complex, unusually large transactions / patterns which appear to have noneconomic purpose.

(c) Nokha Commodity Services specifies internal threshold limits for each class of client’s accounts and pay special attention to the transaction, which exceeds the prescribed limits.

(d) 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.

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(e) Such findings, records and related documents should be made available to Auditors / SEBI/FMC /Stock Exchanges/FIU-IND and other relevant authorities, during audit, inspection and/or as and when required. These records are required to be maintained and preserved for a period of five years (5)from the date of transaction between the client and Nokha Commodity Services.

(f) Nokha Commodity Services shall ensure a record of transaction is preserved and maintained in terms of section 12 of the PML Act and that transaction of suspicious nature or any other transaction notified under section 12 of the Act is reported to the appropriate law authority. Suspicious transactions shall also be regularly reported to the higher authorities / head of the department.

(g) Nokha Commodity Services compliance team shall randomly examine select of transaction undertaken by clients to comment on their nature through Whistle Blower Policy i.e. whether they are in the suspicious transactions or not.

15. Suspicious Transaction Monitoring & Reporting

We shall ensure to take appropriate steps to enable suspicious transactions to be recognized and have appropriate procedures for reporting suspicious transactions within 7 days of arriving at a conclusion that any transaction whether cash or non-cash, or a series of transactions integrally connected are suspicious transactions. Irrespective of the amount of transaction and/or the threshold limit envisaged for predicate offences specified in part B of Schedule of PMLA, 2002, we will file STR within 7 days with FIU-IND, if we have reasonable grounds to believe that the transactions involve proceeds of crime.

No nil reporting needs to be made to FIU-IND in case there are no cash/suspicious transactions to be reported. We shall also provide following information in the grounds of suspicion:
(a) Details of initial alert.
(b) Information collected during analysis of alert.
(c) KYC information of the Client.
(d) Period and quantum of activities being reported.
(e) Name(s) of scripts if reported transaction relates to a particular / few scripts.
(f) Statement regarding suspicion.

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A list of circumstances which may be in the nature of suspicious transactions is given below. This list is only illustrative and whether a particular transaction is suspicious or not will depend upon the background, details of the transactions and other facts and circumstances:

- Clients whose identity verification seems difficult or clients appears not to cooperate
- Asset management services for clients where the source of the funds is not clear or not in keeping with clients apparent standing /business activity;
- Clients in high-risk jurisdictions or clients introduced by banks or affiliates or other clients based in high risk jurisdictions
- Substantial increases in business without apparent cause;
- Unusually large cash deposits made by an individual or business;
- Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
- Transfer/attempted transfer of investment proceeds to apparently unrelated third parties;
- Unusual transactions by CSCs and businesses undertaken by, offshore banks/financial services, businesses reported to be in the nature of export-import of small items.
- Transactions in dormant accounts: Any debit transaction in the dormant account will be reported as alert
- Cash Transaction Report [CTR] to be submitted within 15 days of the following month with FIUIND.

The same is not Applicable to Nokha Commodity Services as it doesn't accept cash from any of its clients.

16. Notification

Any suspicion transaction shall be immediately notified to the Principal Officer and/or Designated Director/Partner or any other designated officer. The notification may be done in the form of a detailed report with specific reference to the clients, transactions and the nature /reason of suspicion. However, it shall 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 and/or Designated Director 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.

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17. Designation of an officer for reporting of Suspicious Transactions

To ensure proper discharge of legal obligations to report suspicious transactions to the authorities, the Principal Officer and/or Designated Director 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.

18. High standards in hiring policies and training with respect to Anti-Money laundering

Nokha Commodity Services shall have adequate screening procedures in place to ensure high standards when hiring employees. Nokha Commodity Services identifies the key positions within the organization having regard to the risk of money laundering and terrorist financing and the size of the business and ensure the employees taking up such key positions are suitable and competent to perform their duties. Nokha Commodity Services provides proper Anti money laundering and anti-terrorist financing training to staff members (Nokha Commodity Services have adopted Whistle Blower Policy).

19. Adoption of Whistle Blower Policy

Nokha Commodity Services have adopted the ‘Whistle Blower Policy’ which would enable the staff employees to take into account and consider the transactions immediately, that seems to be suspicious. Nokha Commodity Services have created a smooth communication link between staff & employer to ensure smooth flow of information in this regard.

20. Investors Education

Mailers, updates and such other relevant disclosures pertaining to AML/CFT policy and/or regulations, as received from various regulators & other sources from time to time, shall be shared with the clients and employees to educate them about the same.

For Nokha Commodity Services

Partner / Authorized Signatory