



CROWN CONSULTANTS PRIVATE LIMITED

CIN- U74140MH1985PTC035548

Registered/ Corporate Office:

G-6/7, Amit Industrial Estate, Dr. S. S. Rao Road, Near Citi Tower, Parel, Mumbai - 400 012

T 91-22-4069 0701-710 Fax No. 022- 40690777 E info@crownsec.com Website : crownsec.com

POLICIES AND PROCEDURE FOR PREVENTION OF MONEY LAUNDERING

(as per the PMLA Act (Amended), 2002)

Policy prepared by	Policy reviewed by	Date of Review
Compliance team	Management	07.04-2026

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(As per the PMLA Act, 2002)

Policy revised as per SEBI Circular SEBI/HO/MIRSD/SEC-FATF/P/CIR/2023/0170 October 13, 2023, SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2024/78 June 06, 2024.

1. Company Policy

It is the policy of the company to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets.

2. Principal Officer Designation and Duties

The company has designated Mr. Jagannath Udaynath Muni as the Principal Officer for its Anti-Money Laundering Program, with full responsibility for the company AML program is qualified by experience, knowledge and training. The duties of the Principal Officer will include monitoring the company compliance with AML obligations and overseeing communication and training for employees. The Principal Officer will also ensure that proper AML records are kept. When warranted, the Principal Officer will ensure filing of necessary reports with the Financial Intelligence Unit (FIU – IND)

The company has provided the FIU with contact information of the Principal Officer, including name, title, mailing address, e-mail address, telephone number and facsimile number. The company will promptly notify FIU of any change to this information.

3. Appointment of Designated Director

In addition to the existing requirement of designation of a Principal Officer, we have appointed Mr. Pramod Chandaliya as a 'Designated Director' in terms of Rule 2 (ba) of the PML Rules & we have communicated same to the FIU- IND.

4. Customer Due Diligence/KYC Standards

New customer acceptance procedures adopted include following processes:

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 Security Council Committee established pursuant to various United Nations' Security Council Resolutions (UNSCRs) can be accessed in the United Nations website at <http://www.un.org/sc/committees/1267/consolist.shtml>. Before opening any new account, it will be ensured that the name/s of the proposed customer does not appear in the list; further,

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 should immediately be intimated to SEBI and FIU-IND:

- a. Customer identification and In-person verification of the customer, depending on nature /status of the customer and kind of transactions that are expected by the customer. Also at the time of commencement of an account-based relationship, identify its clients, verify their identity and obtain information on the purpose and intended nature of the business relationship.
- b. One certified copy of an 'officially valid document'(OVD) containing details of his identity and address, one recent photograph and such other documents including in respect of the nature of business and financial status of the client, OVD includes:
 - A. The passport,
 - B. the driving license,
 - C. proof of possession of Aadhaar number,
 - D. the Voter's Identity Card issued by Election Commission of India,
 - E. job card issued by NREGA duly signed by an officer of the State
 1. Government and
 - F. the letter issued by the National Population Register containing details
 1. of name, address, or any other document as notified by the Central
 2. Government in consultation with the Regulator.
- c. PML Rules allows an investor to submit other OVD instead of PAN, however, in terms of SEBI circular MRD/DOP/Cir- 05/2007 dated April 27, 2007 the requirement of mandatory submission of PAN by the investors for transaction in the securities market shall continue to apply.
- d. The RI shall forward the KYC completion intimation letter through registered post/speed post or courier, to the address of the investor in cases where the investor has given address other than as given in the OVD. In such cases of return of the intimation letter for wrong / incorrect address, addressee not available etc., no transactions shall be allowed in such account and intimation shall also sent to the Stock Exchange and Depository.
- e. False/incorrect identification of documents.
- f. Client should remain present for registration personally.
- g. Compliance with guidelines issued by various regulators such as SEBI,FIU,RBIetc.
- h. Establishing identity of the client, verification of addresses, phone numbers and other details.
- i. Obtaining sufficient information in order to identify persons who beneficially own or control the trading account and demat account. Whenever it is apparent that the securities acquired or maintained through an account are beneficially owned by entity other than the client.
- j. Verification of the genuineness of the PAN provided by the client such as comparing with original PAN, checking details on the Income tax website etc.obtaining annual financial statement/confirmation from all clients specially those dealing in derivatives and leverage product.
- k. Checking original documents before accepting a copy.
- l. Asking for any additional information as deemed fit on case to case basis to satisfy about the Genuineness and financial standing of the client.

- m. Whether the client has any criminal background, whether he has been at any point of time been associated in any civil or criminal proceedings any where checking whether at any point of time he has been banned from trading in the stock market.

For existing clients processes include:

- a. Review of KYC details of all the existing active clients in context to the PMLA 2002 requirements.
- b. Classification of clients into high, medium or low risk categories based on KYC details, trading activity etc.
- c. Obtaining of annual financial statements from all clients, particularly those in high risk categories.
- d. In case of non-individuals additional information about the directors, partners, dominant promoters and major shareholders is obtained.

5. Client Identification & Verifications

At the time of opening an account or executing any transaction with it, the company will verify and maintain the record of identity and current address or addresses including permanent address or addresses of the client, the nature of business of the client and his financial status as under:

Constitution of Client	Proof of Identity	Proof of Address	Others
Individual	<ul style="list-style-type: none"> • PAN Card 	<ul style="list-style-type: none"> • Copy of Bank Statement, valid driving license, Aadhar card, valid passport Rent Agreement, Electricity bill etc. 	<ul style="list-style-type: none"> • N.A.
Company	<ul style="list-style-type: none"> • PAN Card • Certificate of incorporation • Memorandum and Articles of Association • Resolution of Board of Directors • List of Authorized Signatory 	<ul style="list-style-type: none"> • Copy of Bank Statement, Copy of ROC master, Electricity bill ,Rent Agreement 	<ul style="list-style-type: none"> • Proof of Identity and address of the Directors/ authorized Signatories to trade on behalf of the company

Constitution of Client	Proof of Identity	Proof of Address	Others
Partnership Firm	<ul style="list-style-type: none"> • PAN Card • Registration certificate • Partnership deed • List of Authorized Signatory 	<ul style="list-style-type: none"> • Copy of Bank Statement, Copy of ROC master, Electricity bill ,Rent Agreement 	<ul style="list-style-type: none"> • Proof of Identity and address of the Partners/Signatories authorized to trade on behalf of the company
Trust	<ul style="list-style-type: none"> • PAN Card • Registration certificate • Trust deed • List of Authorized Signatory 	<ul style="list-style-type: none"> • Copy of Bank Statement, Copy of ROC master, Electricity bill ,Rent Agreement 	<ul style="list-style-type: none"> • Proof of Identity and address of the Trustees/ others authorized to trade on behalf of the trust
AOP/ BOI	<ul style="list-style-type: none"> • PAN Card • Resolution of the managing body • Documents to collectively establish the legal existence of such an AOP/ BOI • List of Authorized Signatory 	<ul style="list-style-type: none"> • Copy of Bank Statement, Copy of ROC master, Electricity bill ,Rent Agreement 	<ul style="list-style-type: none"> • Proof of Identity of the Persons authorized to trade on behalf of the AOP/ BOI

1. If a potential or existing customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, our company will not open the new account.
2. The company will maintain records of all identification information for eight years after the account has been closed.
3. We have a system to determine whether our existing / potential customer is a politically exposed person (PEP) for that we may ask additional information to clients or access to publicly available information etc.
Such PEP clients, needs to obtain the approval from Chairman or from any of our Directors before establishing business relationship. Principal Officer will verify the sources of funds from clients identified as PEP. Each original document is verified before accepting the copies of the same. Failure to provide any documents by any of the prospective client is noted and reported to the Director immediately.

6. Risk Profiling of customer

- **CROWN CONSULTANTS PRIVATE LIMITED** has adopted a risk-based approach in implementing its AML framework as spelt out in the AML Policy of the Broker. This approach includes assessment of various risks associated with different types of customer.

For the purpose customers are classified under three broad categories

1. High Risk customers
 2. Medium Risk customers
 3. Low Risk customers
- Customers who are being referred by **CROWN CONSULTANTS PRIVATE LIMITED** shall be classified under Low Risk category.
 - Classification of both the new and existing clients into high or medium category depending on parameters such as the customer's background, type of business relationship, Geographical location transactions etc. Following procedures are adopted for all clients for Risk Categorization:
 - a. Large number of accounts having a common account holder in DP
 - b. Unexplained transfers between multiple accounts with no rationale in DP
 - c. Unusual activity compared to past transactions
 - d. Doubt over the real beneficiary of the account
 - e. Payout/pay-in of funds and securities transferred to /from a third party
 - f. Off market transactions especially in illiquid stock at unrealistic prices
 - g. Large sums being transferred from overseas for making payments
 - h. Inconsistent with the clients' financial background
 - i. Inconsistent with the clients' educational background
 - j. Large number of accounts having common parameters such as common partners / directors / promoters / address / email address / telephone numbers / introducers or authorized signatories;
 - k. Geographical location

Additional due diligence is carried out in respect of high and medium risk clients are as under:

Application of each of the customers' due diligence measures on a risk sensitive basis and adoption of an enhanced customer due diligence process for high and medium risk categories of customers and vice-à-versa.

Following Risk based procedures are adopted for High and Medium Risk clients:

- Substantial increase in activity without any apparent cause.
- Transactions with no apparent economic or business rationale.
- Sudden activity in dormant accounts;
- Source of funds are doubtful or inconsistency in payment pattern;
- Unusual and large cash deposits made by an individual or business;
- Transfer of investment proceeds to apparently unrelated third parties;

- Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
 - Purchases made on own account transferred to a third party through off market transactions through DP Accounts;
 - Suspicious off market transactions;
 - Large deals at prices away from the market.
- Further to above it is also necessary to cross verify the details of prospective customers with the databases of UN or other similar entity, **CROWN CONSULTANTS PRIVATE LIMITED** 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 should immediately be intimated to SEBI and FIU-IND.
- 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 Security Council Committee established pursuant to various United nations' Security Council Resolutions (UNSCRs) needs to be accessed in the United Nations website at <http://www.un.org/sc/committees/1267/consolist.shtml> and <http://www.un.org/sc/committees/1988/list.shtml>).
- With regard to client with a dubious reputation, **CROWN CONSULTANTS PRIVATE LIMITED** will obtain the information from various other legitimate sources like <http://www.sebi.gov.in>, <http://www.sebi.gov.in/pmd/debarredco1.html>, <http://www.sebi.sebi.gov.in/pmd/debardirector1.html>, http://www.sebi.gov.in/cis_prosecutiondata.html, <http://www.sebi.gov.in/cis/noncisdata.html>, <http://www.watchoutinvestors.com/default2a.asp>, <https://www.nseindia.com/regulations/member-sebi-debarred-entities> <http://www.bseindia.com/investors/debent.aspx> <https://suit.cibil.com>
- In addition to above it is also necessary to identify and classify customers under 'Clients of Special Category' (CSC) an illustrative list of 'Clients of Special Category' (CSC) shall be read as under:
 1. Non-resident clients,
 2. High net-worth clients,
 3. Trust, Charities, NGOs and organizations receiving donations,
 4. Companies having close family shareholdings or beneficial ownership,
 5. 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.
 6. Companies offering foreign exchange offerings,
 7. Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect or which do not or insufficiently apply FATF standards, 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,

8. Non face to face clients,
9. Clients with dubious reputation as per public information available etc.

Treatment of Accounts of Clients of Special Category

1. NRI: - While opening NRI account utmost care should be exercised. Collect the following documents:
 - PAN Card Copy;
 - Pass Port Copy with date of arrival in case personal visit
 - Indian & foreign Address Proof;
 - Cancelled cheque copy of NRE A/c, Cancel Cheque copy of NRO A/c, along with PIS permission issued from RBI & Bank statement copy;
 - Client master copy for Demat account;
 - FEMA declaration;
 - Custodian Participant details
2. High Net worth Clients:-High Net worth clients could be classified as such if at the account opening stage or during the course of the relationship, it is realized that the client's investments or the appropriate for investment is high.
3. Trust, Charity and NGOs, and NPOs: -Public as well as private, registered as well as unregistered trust will have to be classified in the special category. NPO deceleration to the taken.
4. We shall register the details of a client, in case of client being a non-profit organization, on the DARPAN Portal of NITI Aayog, if not already registered, and maintain such registration records for a period of five years after the business relationship between a client and we shall have ended or the account has been closed, whichever is later
5. Politically Exposed Person: - In case of PEPs, the account should be opened only after consent of the senior management and principal officer & all the required documents are collected and client should be marked as PEP in records. Where a client has been accepted and the client or beneficial owner is subsequently found to be, or subsequently becomes PEP, registered intermediaries shall obtain senior management approval to continue the business relationship.
6. The above-mentioned list is only illustrative and the we shall exercise independent judgment to ascertain whether any other set of clients shall be classified as CSC or not.

7. Identification of Beneficial Ownership

- At the time of opening an account or executing any transaction with it, the **CROWN CONSULTANTS PRIVATE LIMITED** will verify sufficient information from their clients in order to identify and verify the identity of persons who beneficially own or control the securities account.
- The beneficial owner has been defined as the natural person or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a legal person or arrangement.

Following are the steps taken for identifying beneficial owners of the client:

A. For Corporate

Check would be done for actual beneficial ownership and control of the particular account. We need to obtain the details with respect to Shareholders / promoters (Holding more than 10 % or more of share capital of Corporate entities), Partners (Holding more than 10 % or more of capital or profits of partnership firm.), Unincorporated association or body of individuals (Holding more than 15 % or more of property or capital or profits of juridical person) from the non-individual clients and wherever possible it has to be verified independently. Where the client is a trust, 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 10% 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. 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.

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.

Controlling ownership interest means ownership of/entitlement to:

(I) more than 10% of shares or capital or profits of the juridical person, where the juridical person is a company;

(II) More than 10% 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 1 (a) 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.

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

c. Where no natural person is identified under clauses 1 (a) or 1 (b) above, the identity of the relevant natural person who holds the position of senior managing official.

B. For client which is a trust:

Where the client is a trust, we identify the beneficial owners, through the identity of the settler of the trust, the trustee, the protector, the beneficiaries with 10% 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.

C. 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.

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

(I) In case 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 are regulated, supervised or monitored by us, and have measures in place for compliance with CDD and record-keeping requirements in line with the obligations under the PML Act.

(II) 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 registered intermediary shall be ultimately responsible for CDD and undertaking enhanced due diligence measures, as applicable.

8. Maintenance of records

The Principal Officer will be responsible for the maintenance for following records:

- All cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency;
- All series of cash transactions integrally connected to each other which have been valued below rupees ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month;
- 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. 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 circumstances of unusual or unjustified complexity; or
 - appears to have no economic rationale or bonafide purpose; or

- gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism

The records shall contain the following information:

- The nature of the transactions;
- The amount of the transaction and the currency in which it was denominated;
- The date on which the transaction was conducted; and
- The parties to the transaction."

The records will be updated on daily basis, and in any case not later than 5 working days.

In case of any suspected 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, registered intermediaries shall retain the following information for the accounts of their clients in order to maintain a satisfactory audit trail:

- I. the beneficial owner of the account;
- II. the volume of the funds flowing through the account; and
- III. 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.

Registered Intermediaries shall ensure that all client and transaction records and information are available on a timely basis to the competent investigating authorities. Where required by the investigating authority, they shall retain certain records, e.g. client identification, account files, and business correspondence, for periods which may exceed those required under the SEBI Act, Rules and Regulations framed there under PMLA, other relevant legislations, Rules and Regulations or Exchange byelaws or circulars.

9. Record Keeping

CROWN CONSULTANTS PRIVATE LIMITED shall maintain and preserve the record 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 eight years after the business relationship between a client and CROWN CONSULTANTS PRIVATE LIMITED has ended or the account has been closed, whichever is later.

CROWN CONSULTANTS PRIVATE LIMITED 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 eight years from the date of the transaction between the client and CROWN CONSULTANTS PRIVATE LIMITED

10. Monitoring Accounts For Suspicious Activity

The company will monitor through the automated means of Back Office Software (*specify how suspicious transaction activity would be monitored*) for unusual size, volume, pattern or type of transactions. The following kinds of activities are to be mentioned as Red Flags and reported to the Principal Officer:

- The customer exhibits unusual concern about the company compliance with government reporting requirements and the firm's AML policies (particularly concerning his or her identity, type of business and assets), or is reluctant or refuses to reveal any information concerning business activities, or furnishes unusual or suspicious identification or business documents.
- The customer wishes to engage in transactions that lack business sense or apparent investment strategy, or are inconsistent with the customer's stated business or investment strategy.
- The information provided by the customer that identifies a legitimate source for funds is false, misleading, or substantially incorrect.
- Upon request, the customer refuses to identify or fails to indicate any legitimate source for his or her funds and other assets.
- The customer (or a person publicly associated with the customer) has a questionable background or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- The customer exhibits a lack of concern regarding risks, commissions, or other transaction costs.
- The customer appears to be acting as an agent for an undisclosed principal, but declines or is reluctant, without legitimate commercial reasons, to provide information or is otherwise evasive regarding that person or entity.
- The customer has difficulty describing the nature of his or her business or lacks general knowledge of his or her industry.
- The customer attempts to make frequent or large deposits of currency, insists on dealing only in cash, or asks for exemptions from the company policies relating to the deposit of cash.
- Transactions reflect likely market manipulations;
- 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 client
- Block deal which is not at market price or prices appear to be artificially inflated/deflated.

11. Reporting to FIU IND

For Cash Transaction Reporting

- All dealing in Cash that requiring reporting to the FIU IND will be done in the CTR format and in the matter and at intervals as prescribed by the FIU IND

For Suspicious Transactions Reporting

We will make a note of Suspicion Transaction that have not been explained to the satisfaction of the Principal Officer and thereafter report the same to the FIU IND and the required deadlines. This will typically be in cases where we know, suspect, or have reason to suspect:

- The transaction involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity as part of a plan to violate or evade any the transaction reporting requirement,
- The transaction is designed, whether through structuring or otherwise, to evade the any requirements of PMLA Act and Rules framed thereof
- The transaction has no business or apparent lawful purpose or is not the sort in which the customer would normally be expected to engage, and we know, after examining the background, possible purpose of the transaction and other facts, of no reasonable explanation for the transaction, or
- The transaction involves the use of the company to facilitate criminal activity.

We will not base our decision on whether to file a STR solely on whether the transaction falls above a set threshold. We will file a STR and notify law enforcement of all transactions that raise an identifiable suspicion of criminal, terrorist, or corrupt activities.

All STRs will be reported quarterly to the Management, with a clear reminder of the need to maintain the confidentiality of the STRs

We will not notify any person involved in the transaction that the transaction has been reported, except as permitted by the PMLA Act and Rules thereof.

12. AML Record Keeping

A) STR Maintenance and Confidentiality

We will hold STRs and any supporting documentation confidential. We will not inform anyone outside of a law enforcement or regulatory agency or securities regulator about a STR. We will refuse any requests for STR information and immediately tell FIU IND of any such request we receive. We will segregate STR filings and copies of supporting documentation from other firm books and records to avoid disclosing STR filings. Our Principal Officer will handle all requests or other requests for STRs.

B) Responsibility for AML Records and STR Filing

Principal Officer will be responsible to ensure that AML records are maintained properly and that STRs are filed as required.

C) Records Required

As part of our AML program, our company will create and maintain STRs and CTRs and relevant documentation on customer identity and verification. We will maintain STRs and their accompanying documentation for at least eight years.

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

Section 51A, of the Unlawful Activities (Prevention) Act, 1967 (UAPA), relating to the purpose of prevention of, and for coping with terrorist 33 | Page activities was brought into effect through UAPA Amendment Act, 2008. In this regard, the Central Government has issued an Order dated August 27, 2009 detailing the procedure for the implementation of Section 51A of the UAPA. 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 engaged in terrorism. The obligations to be followed by intermediaries to ensure the effective and expeditious implementation of said Order has been issued vide SEBI Circular ref. no: ISD/AML/CIR-2/2009 dated October 23, 2009, which needs to be complied with scrupulously.

14. List of Designated Individuals/ Entities

The Ministry of Home Affairs, in pursuance of Section 35(1) of UAPA 1967, declares the list of individuals/entities, from time to time, who are designated as 'Terrorists'. The registered intermediaries shall take note of such lists of designated individuals/terrorists, as and when communicated by SEBI.

All orders under section 35 (1) and 51A of UAPA relating to funds, financial assets or economic resources or related services, circulated by SEBI from time to time shall be taken note of for compliance.

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 <https://press.un.org/en/content/press-release>. The details of the lists are as under:

- The "ISIL (Da'esh) & Al-Qaida Sanctions List", which includes names of individuals and entities associated with the Al-Qaida. The updated ISIL & Al-Qaida Sanctions List is available at: <https://www.un.org/securitycouncil/sanctions/1267/press-releases>.
- The list issued by United Security Council Resolutions 1718 of designated Individuals and Entities linked to Democratic People's Republic of Korea www.un.org/securitycouncil/sanctions/1718/press-releases.
- CROWN CONSULTANTS PRIVATE LIMITED 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.
- The Stock Exchanges and the registered intermediaries shall maintain updated designated lists in electronic form and run a check on the given parameters on a regular basis to verify whether the designated individuals/entities are holding any funds, financial assets or economic resources or related services held in the form of securities with them.
- CROWN CONSULTANTS PRIVATE LIMITED shall also file a Suspicious Transaction Report (STR) with FIU-IND covering all transactions carried through or attempted in the accounts

covered under the list of designated individuals/entities under Section 35 (1) and 51A of UAPA.

- Full details of accounts bearing resemblance with any of the individuals/entities in the list shall immediately be intimated to the Central [designated] Nodal Officer for the UAPA, at Fax No.011-23092551 and also conveyed over telephone No. 011-23092548. The particulars apart from being sent by post shall necessarily be conveyed on email id: jsctcr-mha@gov.in.
- CROWN CONSULTANTS PRIVATE LIMITED shall also send a copy of the communication mentioned above to the UAPA Nodal Officer of the State/UT where the account is held and to SEBI and FIU-IND, without delay. The communication shall be sent to SEBI through post and through email (sebi_uapa@sebi.gov.in) to the UAPA nodal officer of SEBI, Deputy General Manager, Division of FATF, Market Intermediaries Regulation and Supervision Department, Securities and Exchange Board of India, SEBI Bhavan II, Plot No. C7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051. The consolidated list of UAPA Nodal Officers is available at the website of Government of India, Ministry of Home Affairs.

15. Employee Hiring and Training Programs

We have adequate screening procedures in place to ensure high standards when hiring employees. They should identify the 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.

We will develop ongoing employee training under the leadership of the Principal Officer. Our training will occur at least on annual basis. It will be based on our company size, its customer base, and its resources.

Our training will include, at a minimum: how to identify red flags and signs of money laundering that arise during the course of the employees' duties; what to do once the risk is identified; what employees' roles are in the company compliance efforts and how to perform them; the company record retention policy; and the disciplinary consequences (including civil and criminal penalties) for non-compliance with the PMLA Act.

We will develop training in our company, or contract for it. Delivery of the training may include educational circulars, intranet systems, in-person lectures, and explanatory memos.

We will review our operations to see if certain employees, such as those in compliance, margin, and corporate security, require specialized additional training. Our written procedures will be updated to reflect any such changes.

16. Monitoring Employee Conduct and Accounts

We will subject employee accounts to the same AML procedures as customer accounts, under the supervision of the Principal Officer. We will also review the AML performance of supervisors, as part of their annual performance review. The Principal Officer's accounts will be reviewed by the Management.

17. Confidential Reporting of AML Non-Compliance

Employees will report any violations of the company AML compliance program to the Principal Officer, unless the violations implicate the Principal Officer. In which case the employee shall report **the Director/ Management of the Company**. Such reports will be confidential, and the employee will suffer no retaliation for making them.

18. Management Approval

We have approved this AML program as reasonably designed to achieve and monitor our company ongoing compliance with the requirements of the PMLA and the implementing regulations under it.

19. Procedure for unfreezing of funds, financial assets or economic resources or related services of individuals/entities inadvertently affected by the freezing mechanism upon verification that the person or entity is not a designated person

Any individual or entity, if it has evidence to prove that the freezing of funds, financial assets or economic resources or related services, owned/held by them has been inadvertently frozen, shall move an application giving the requisite evidence, in writing, to the concerned stock exchanges/depositories and registered intermediaries. The stock exchanges/depositories and registered intermediaries shall inform and forward a copy of the application together with full details of the asset frozen given by any individual or entity informing of the funds, financial assets or economic resources or related services have been frozen inadvertently, to the nodal officer of IS-I Division of MHA as per the contact details given in paragraph 5(ii) above within two working days. The Joint Secretary (IS-I), MHA, being the nodal officer for (ISI) Division of MHA, shall cause such verification as may be required on the basis of the evidence furnished by the individual/entity and if he is satisfied, he shall pass an order, within fifteen working days, unfreezing the funds, financial assets or economic resources or related services, owned/held by such applicant under intimation to the concerned stock exchanges, depositories and registered intermediaries. However, if it is not possible for any reason to pass an order unfreezing the assets within fifteen working Days, the nodal officer of IS-I Division shall inform the applicant.

20. Amendment to Gazette Notification Dated June 01, 2017 and December 13, 2017:

As per Gazette Notification Dated December 13, 2017, To provide for submission of Aadhaar Number, Where The Client Enters Into an Account Based Relationship with Reporting Entity And To Revise The Existing Timelines For Submission of Aadhaar Number To March 31, 2018 or Six Months From The Date Of Commencement Of Account Based Relationship By The Client, Whichever Is Later.

In Case Of Failure to Submit the Documents within the Aforesaid Timelimit, The Account Shall Cease to Be Operational Till the Time Aadhaar Number Is Submitted by the Client.

In pursuance of clause (a) and clause (c) of sub-rule (17) of rule 9 of the Prevention of Money-laundering (Maintenance of Records) Rules, 2005, the Central Government hereby notifies the 31st March, 2018 or six months from the date of commencement of account based relationship by the client, whichever is later, as the date of submission of the Aadhaar Number, and Permanent Account Number or Form 60 by the clients to the reporting entity.

21. Amendment to Gazette Notification Dated August 20, 2019 :

As per gazette notification Dated August 20, 2019, intermediaries or Reporting entities having "Digital KYC PROCESS" or E-KYC as widely known shall be subject to following Process:

The CROWN CONSULTANTS PRIVATE LIMITED shall develop a portal for digital KYC process which shall be made available at customer touch points for undertaking KYC of their customers and the KYC process shall be undertaken only through this authenticated & Secured Portal.

The access of the portal shall be controlled by the CROWN CONSULTANTS PRIVATE LIMITED and it should be ensured that the same is not used by unauthorized persons. The Application shall be accessed only through Mobile no. and password or Live OTP controlled mechanism given by CROWN CONSULTANTS PRIVATE LIMITED to its authorized officials.

The client, for the purpose of KYC, shall visit the portal prescribed & controlled by CROWN CONSULTANTS PRIVATE LIMITED or authorized official of the Entity.

The CROWN CONSULTANTS PRIVATE LIMITED must ensure that the Live photograph of the client is taken via the web portal controlled by CROWN CONSULTANTS PRIVATE LIMITED and the same photograph is embedded in the Customer Application Form (CAF).

Thereafter, all the entries in the CAF shall be filled by Beneficial Owner as per the documents and information. In those documents where Quick Response (QR) code is available, such details can be auto-populated by scanning the QR code instead of manual filing the details.

Further, the web Application of the CROWN CONSULTANTS PRIVATE LIMITED shall put in a readable form having CAF number, authorized official's name, unique employee Code (assigned by Reporting Entities) and Date (DD:MM:YYYY) and time stamp (HH:MM:SS).

The live photograph of the client and his original documents shall be captured in proper readable format so that they are clearly readable and identifiable.

Thereafter, all the entries in the CAF shall be filled as per the documents and information furnished by the client. In those documents where Quick Response (QR) code is available.

Once the above mentioned process is completed, a One Time Password (OTP) message containing the text that 'Please verify the details filled in form before entering OTP' shall be sent

to client's own mobile number. Upon successful validation of the OTP, it will be treated as client signature on CAF. However, if the client does not have his/her own mobile number, then mobile number of his/her family may be used for this purpose and be clearly mentioned in CAF. In any case, the mobile number of authorized officer registered with the Reporting Entity shall not be used for client signature. The Reporting Entity must check that the mobile number used in client signature shall not be the mobile number of the authorized officer.

The authorized officer of the CROWN CONSULTANTS PRIVATE LIMITED shall check and verify that:-

- (I) Information available in the generated document (PDF/ASPX) is matching with the information in the documents attached therewith.
- (II) Live photograph of the client matches with the photo available in the document; and
- (III) All of the necessary details in CAF including mandatory field are filled properly;

On Successful verification, the CAF shall be digitally signed by BO & verified by authorized official of CROWN CONSULTANTS PRIVATE LIMITED

22. Procedure for implementation of Section 12A of the Weapons of Mass Destruction and their Delivery System (Prohibition of Unlawful Activities) ACT, 2005

Procedure for implementation of Section 12A of the Weapons of Mass Destruction and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005

The Government of India, Ministry of Finance has issued an order dated January 30, 2023 vide F. No. 12011/14/2022-ES Cell-DOR ("the Order") detailing the procedure for implementation of Section 12A of the Weapons of Mass Destruction and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005 ("WMD Act"). The Order may be accessed by clicking on DoR_Section_12A_WMD.pdf.

In terms of Section 12A of the WMD Act, the Central Government is empowered as under: For prevention of financing by any person of any activity which is prohibited under the WMD Act, or under the United Nations (Security Council) Act, 1947 or any other relevant Act for the time being in force, or by an order issued under any such Act, in relation to weapons of mass destruction and their delivery systems, the Central Government shall have power to Freeze, seize or attach funds or other financial assets or economic resources owned or controlled, wholly or jointly, directly or indirectly, by such person; or

(ii) Held by or on behalf of, or at the direction of, such person; or

iii) Derived or generated from the funds or other assets owned or controlled, directly or indirectly,

by such person;

(b) prohibit any person from making funds, financial assets or economic resources or related services available for the benefit of persons related to any activity which is prohibited under the WMD Act, or under the United Nations (Security Council) Act, 1947 or any other relevant Act for the time being in force, or by an order issued under any such Act, in relation to weapons of mass destruction and their delivery systems.

The Central Government may exercise its powers under this section through any authority who has been assigned the power under sub-section (1) of section 7."

58. The stock exchanges and registered intermediaries are directed to comply with the procedure laid down in the said

59. The Stock Exchanges and registered Intermediaries Shall

(i) Maintain the list of individuals/entities ("Designated List) and update it, without delay, in terms of paragraph 2. 1 of the Order;

(ii) verify if the particulars of the entities/individual, party to the financial transactions, match with the particulars of the Designated List and in case of match, stock exchanges and registered intermediaries shall not carry out such transaction and shall immediately inform the transaction details with full particulars of the funds, financial assets or economic resources involved to the Central Nodal Officer ("CNO"), without delay. The details of the CNO are as under:

The Director FIU-INDIA

Tel.No.011-23314458, 011-23314459 (PAX)

Email: dir@fiuindia.gov.in

(iii) run a check, on the given parameters, at the time of establishing a relation with a client and on a periodic basis to verify whether individuals and entities in the Designated List are holding any funds, financial assets or economic resources or related services, in the form of bank accounts, stocks, insurance policies etc. In case, the clients' particulars match with the particulars of Designated List, stock exchanges and registered intermediaries shall immediately inform full particulars of the funds, financial assets or economic resources or related services held in the form of bank accounts, stocks or insurance policies etc., held on their books to the CNO, without delay;

(iv) Send a copy of the communication, mentioned in paragraphs 59(ii) and

59 (iii) above, without delay, to the Nodal Officer of SEBI. The communication shall be sent to SEBI through post and through email (sebi_uapa@sbi.gov.in) to the Nodal Officer of SEBI, Deputy General Manager, Division of FATE, Market Intermediaries Regulation and Supervision Department, Securities and Exchange Board of India, SEBI Bhavan II, Plot No.

C7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051; (v) prevent such individual/entity from conducting financial transactions, under intimation to the CNO, without delay, in case there are reasons to believe beyond doubt that funds or assets held by a client would fall under the purview of Section 12A (2)(a) or Section 12A(2)(b) of the WMD Act; (vi) file a Suspicious Transaction Report (STR) with the FIU-IND covering all transactions in the accounts, covered under paragraphs 59(ii) and (iii) above, carried through or attempted through. Upon the receipt of the information above, the CNO would cause a verification to be conducted by the appropriate authorities to ensure that the individuals/entities identified are the ones in the Designated List and the funds, financial assets or economic resources or related services, reported are in respect of the designated individuals/entities. In case, the results of the verification indicate that the assets are owned by, or are held for the benefit of, the designated individuals/entities, an order to freeze these assets under section 12A would be issued by the CNO and be conveyed to the concerned reporting entity so that any individual or entity may be prohibited from making any funds, financial assets or economic resources or related services available for the benefit of the designated individuals/entities. Reporting entities shall also comply with the provisions regarding exemptions from the above orders of the CNO and inadvertent freezing of accounts, as may be applicable List of Designated Individuals/ Entities

The Ministry of Home Affairs, in pursuance of Section 35(1) of UAPA 1967, declares the list of individuals/entities, from time to time, who are designated as 'Terrorists'. The registered

intermediaries shall take note of such lists of designated individuals/terrorists, as and when communicated by SEBI

All orders under section 35 (1) and 51A of UAPA relating to funds, financial assets or economic resources or related services, circulated by SEBI from time to time shall be taken note of for compliance. 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 <https://press.un.org/en/content/press-release>. The details of the lists are as under: i. The "ISIL (Da'esh) & Al-Qaida Sanctions List", which includes names of individuals and entities associated with the Al-Qaida. The updated ISILA Al-Qaida Sanctions Lists are available at: <https://www.un.org/securitycouncil/sanctions/1267/press-releases>; li. The list issued by United Security Council Resolutions 1718 of designated Individuals and Entities linked to Democratic People's Republic of Korea www.un.org/securitycouncil/sanctions/1718/press-releases. 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. The Stock Exchanges and the registered intermediaries shall maintain updated designated lists in electronic form and run a check on the given parameters on a regular basis to verify whether the designated individuals/entities are holding any funds, financial assets or economic resources or related services held in the form of securities with them. The Stock Exchanges and the registered intermediaries shall leverage latest technological innovations and tools for effective implementation of name screening to meet the sanctions requirements. The Stock exchanges and the registered intermediaries shall also file a Suspicious Transaction Report (STR) with FIU-IND covering all transactions carried through or attempted in the accounts covered under the list of designated individuals/entities under Section 35 (1) and 51A of UAPA.

Full details of accounts bearing resemblance with any of the individuals/entities in the list shall immediately be intimated to the Central [designated] Nodal Officer for the UAPA, at Fax No.011-23092551 and also conveyed over telephone No.011-23092548. The particulars apart from being sent by post shall necessarily be conveyed on email id: jsctcr-mha@gov.in, The Stock exchanges and the registered intermediaries shall also send a copy of the communication mentioned above to the UAPA Nodal Officer of the State/UT where the account is held and to SEBI and FIU-IND, without delay. The communication shall be sent to SEBI through post and through email (sebi_uapa@sebi.gov.in) to the UAPA nodal officer of SEBI, Deputy General Manager, Division of FATF, Market Intermediaries Regulation and Supervision Department, Securities and Exchange Board of India, SEBI Bhavan II, Plot No. C7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051.

The consolidated list of UAPA Nodal Officers is available at the website of Government of India, Ministry of Home Affairs Jurisdictions that do not or insufficiently apply the FATF Recommendations FATF Secretariat after conclusion of each of it is plenary, releases public statements and places jurisdictions under increased monitoring to strategic deficiencies in their regimes to counter money laundering, terrorist financing. And proliferation financing risks. In this regard, FATF Statements circulated by SEBI from time to time, and publicly available

information, for identifying countries, which do not or insufficiently apply the FATF Recommendations, shall be

Considered by the registered intermediaries. The registered intermediaries shall take into account the risks arising from the deficiencies in AMI./CFT regime of the jurisdictions included in the FATF Statements, However, it shall be noted that the regulated entities are not precluded from having legitimate trade and business transactions with the countries and jurisdictions mentioned in the FATF statements Reporting to Financial Intelligence Unit-India In terms of the PMI, Rules, registered 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, Tower-2, Jeevan Bharati Building, Connaught Place, New Delhi-110001, INDIA Telephone : 91-11 23314429, 23314459 91-11-23319793 (Helpdesk) Email: helpdesk@fluindia.gov.in (For FINnet and general queries)

circell@fluindia.gov.in (For Reporting Entity / Principal Officer registration related queries) complaints@fluindia.gov.in Website: <http://fluindia.gov.in> Registered intermediaries shall carefully go through all the reporting requirements([https://www.sebi.gov.in/sebi_data/commondocs/jun-2024/Brochures on FIU_p.pdf](https://www.sebi.gov.in/sebi_data/commondocs/jun-2024/Brochures_on_FIU_p.pdf)) and formats that are available on the website of FIU - IND under the Section Home - FINNET 2.0 - User, Manuals and Guides-Reporting Format (https://www.sebi.gov.in/sebi_data/commondocs/jun-2024/Reporting_Format_p.pdf). 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, registered intermediaries shall adhere to the following:

- i. The Cash Transaction Report (CTR) (wherever applicable) for each month shall be submitted to FIU-IND by 15th of the succeeding month;
- ii. 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 on being satisfied that the transaction is suspicious, furnish the information promptly in writing by fax or by electronic mail to the Director in respect of transactions referred to in clause (D) of sub-rule (1) of rule 3 of the PML Rules. 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;
- iii. The Non-Profit Organization Transaction Reports (NTRs) for each shall be submitted to FIU-IND by 15th of the succeeding month;
- iv. The Principal Officer will be responsible for timely submission of CTR, STR and NTR to FIU-IND;
- v. Utmost confidentiality shall be maintained in filing of CTR, STR and NTR to FIU-IND;
- vi. No NIL reporting needs to be made to FIU-IND in case there are no cash/ suspicious/non-profit organization transactions to be reported;
- vii. "Non-profit organization" means any entity or organization, constituted for religious or charitable purposes referred to in clause (15) of section 2 of the Income-tax Act, 1961 (43 of 1961), that is registered as a trust or a society under the Societies Registration Act, 1860 (21 of 1860) or any similar State legislation or a Company registered under the section 8 of the Companies Act, 2013 (18 of 2013);

viii. Every registered intermediary, its Directors, officers and all employees shall ensure that the fact of maintenance referred to in Rule 3 of PML Rules and furnishing of information to the Director is kept confidential. Provided that nothing in this rule shall inhibit sharing of information under Rule 3A of PML Rules of any analysis of transactions and activities which appear unusual, if any such analysis has been done. Registered Intermediaries shall not put any restrictions on operations in the accounts where an STR has been made. Registered 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 registered intermediaries, 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.

It is further clarified that "proceeds of crime" include property not only derived or obtained from the scheduled offence but also any property which may directly or indirectly be derived or obtained as a result of any criminal activity relating to the scheduled offence. Confidentiality requirement does not inhibit information sharing among entities in the group.

11. List of Designated Individuals/Entities

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 https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list and <https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list> and <https://www.un.org>

CROWN CONSULTANTS PRIVATE LIMITED staff should ensure that accounts are not opened in the name of anyone whose name appears in said list and CROWN CONSULTANTS PRIVATE LIMITED 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. An indicative list of websites/links for checking names of clients for new clients

and existing clients is as under:

* https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list

* <https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>

* <https://www.un.org>

* <http://www.fiuindia.gov.in/files/misc/unscsanction.html>

23. Investors Education

Before account opening Crown Consultants Private Limited staff should demand certain information like documents evidencing source of funds/income tax returns/bank records etc. from investors which may be of personal nature for implementation of AML/CFT measures. CROWN CONSULTANTS PRIVATE LIMITED should educate the client about the importance and

broad principle of AML/CFT. To implement AML/CFT provisions in true sense there is need to get 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. To satisfy the investors on these aspects so that they can easily provide the information to us we have made them aware of PMLA provisions by way of literature formulated by us.

24. Review of PMLA/AML Policy

Crown Consultants Private Limited shall regularly review yearly basis the AML/PMLA 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.

CROWN CONSULTANTS PRIVATE LIMITEDs shall take adequate measures as per its internal policy to prevent money laundering and shall also put in place a framework for PMLA policy. The policies and procedures as mentioned above shall not be exhaustive as CROWN CONSULTANTS PRIVATE LIMITED may adopt additional measures to safeguard its interest with respect to activities associated with PMLA and in compliance to Guidelines/Circulars/Amendments laid down by SEBI from time to time..

For CROWN CONSULTANTS PRIVATE LIMITED

Ankit Chandaliya
Designated Director
DIN: 01596036