VK Wealthwise & Associates

SEBI Registered Research Analyst Firm (Reg. No. INH000017620)
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Anti-Money Laundering Policy

1. Introduction

This Anti-Money Laundering (AML) Policy is framed in accordance with the requirements of:

- Securities and Exchange Board of India (SEBI) guidelines
- Financial Intelligence Unit – India (FIU-IND)
- Prevention of Money Laundering Act, 2002 (PMLA)

The objective of this policy is to prevent the firm from being used, intentionally or unintentionally, for money laundering or terrorist financing activities.

2. Scope of Policy

This policy applies to:

- All clients onboarded by the firm
- All employees, consultants, and associated persons
- All services offered, including research reports, advisory services, and model portfolios

3. Definitions

- Money Laundering: The process of concealing illicit funds to make them appear legitimate.
- Suspicious Transaction: Any transaction that appears unusual, lacks economic rationale, or raises suspicion.
- Client: Any individual or entity availing the services of the firm.

4. Client Due Diligence (CDD)

4.1 KYC Requirement

- Mandatory KYC verification through any SEBI-registered KRA such as:
    - CAMS KRA
    - CDSL Ventures KRA
    - NDML KRA
- Only clients with “KYC Registered” or “KYC Verified” status will be onboarded.

4.2 Risk Profiling of Clients

Clients shall be categorized into the following risk categories:

- Low Risk: Salaried individuals with known sources of income
- Medium Risk: Self-employed professionals
- High Risk:
    - Politically Exposed Persons (PEPs)
    - Clients with complex ownership structures
    - Non-resident clients

4.3 Enhanced Due Diligence (EDD)

Applicable for high-risk clients:

- Additional documentation
- Verification of source of funds
- Senior-level approval prior to onboarding

5. Ongoing Monitoring

- Periodic review of client profiles
- Monitoring of unusual patterns such as:
    - Frequent changes in investment behaviour
    - Requests inconsistent with the client’s financial profile

6. Record Keeping

The firm shall maintain records of:

- Client KYC documents
- Agreements and communications
- Research reports and recommendations

Retention Period:

- Minimum of 5 years or as prescribed by SEBI/FIU-IND regulations.

7. Reporting of Suspicious Transactions

- Any suspicious activity shall be reported to the Financial Intelligence Unit – India (FIU-IND).
- Reporting shall be carried out through the FIU-IND FINnet 2.0 Portal.
- Strict confidentiality shall be maintained in all such cases.

8. Appointment of Officials

- Principal Officer: Responsible for AML compliance and reporting.
- Designated Director: Responsible for overall AML compliance oversight.

Mr. Vatsal Khemka is hereby designated as the Principal Officer as well as the Designated Director for the purpose of Anti-Money Laundering (AML) compliance and reporting under applicable regulations.

All AML-related communications, including reporting of suspicious transactions, may be directed to:

- **Name:** Mr. Vatsal Khemka
- **Phone:** 78777-77844
- **Email:** vatsalkhemka2001@gmail.com

9. Employee Training

- Periodic training on AML/CFT guidelines
- Awareness programs regarding suspicious transaction indicators

10. Internal Controls & Audit

- Periodic internal review of AML processes
- Ensuring adherence to SEBI and FIU-IND guidelines

11. Prohibited Activities

The firm shall not:

- Accept cash payments beyond regulatory limits

- Deal with anonymous clients
- Facilitate transactions lacking transparency

12. Client Acceptance Policy

The firm reserves the right to:

- Reject clients with inadequate documentation
- Reject clients with suspicious backgrounds

13. Review of Policy

- This policy shall be reviewed annually or as required due to regulatory changes.

14. Declaration

VK Wealthwise & Associates is committed to maintaining the highest standards of integrity and ensuring compliance with all applicable AML laws and regulations.