

VK Wealthwise & Associates

ANTI-MONEY LAUNDERING (AML) POLICY

VK Wealthwise & Associates (SEBI Registered Research Analyst)

1. Introduction

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

- Securities and Exchange Board of India guidelines
- Financial Intelligence Unit India
- Prevention of Money Laundering Act 2002 (PMLA)

The objective 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, and model portfolios

3. Definitions

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

4. Client Due Diligence (CDD)

4.1 KYC Requirement

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

4.2 Risk Profiling of Clients

Clients shall be categorized into:

- Low Risk: Salaried individuals, 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
- Source of funds verification
- Senior-level approval before onboarding

5. Ongoing Monitoring

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

6. Record Keeping

The firm shall maintain records of:

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

Retention Period:

- Minimum 5 years or as prescribed by SEBI/FIU

7. Reporting of Suspicious Transactions

- Any suspicious activity shall be reported to: Financial Intelligence Unit India
- Reporting shall be done via: FIU-IND FIN net 2.0 Portal
- Strict confidentiality will be maintained

8. Appointment of Officials

- Principal Officer: Responsible for AML compliance and reporting
- Designated Director: Overall responsibility for ensuring compliance

(**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 of suspicious indicators

10. Internal Controls & Audit

- Periodic internal review of AML processes
- Ensure adherence to SEBI and FIU 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 background

13. Review of Policy

- This policy shall be reviewed annually or as required by 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.

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