



Member : BSE, NSE, NSE F & O & CDSIL

RISK MITIGATION PLAN :

Intermediaries shall ensure that appropriate steps are taken to enable the risk mitigation plan to be recognized and have appropriate procedures for reporting risk mitigation plan.

While determining risk mitigation, intermediaries shall be guided by the definition of a suspicious transaction contained in PML Rules as amended from time to time.

- (a) Clients whose identity verification seems difficult or Clients that appear not to cooperate.
- (b) Clients where the source of the funds is not clear or not in keeping with Clients apparent standing /business activity;
- (c) Clients based in high-risk jurisdictions;
- (d) Substantial increases in business without apparent cause;
- (e) Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
- (f) Attempted transfer of investment proceeds to apparently unrelated third parties;
- (g) Unusual transactions undertaken by offshore banks/financial services, businesses reported to be in the nature of export import of small items.
- (h) Continuously scan all existing accounts to ensure that no account is held by or linked to only of the entities or individuals included in the list.

In case any suspicious transactions occur, the following procedure shall be followed for further Risk Mitigation:

- Inform the Board, SEBI and FIU (Steps mention in PMLA).
- 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 other appropriate compliance, risk management and related staff members shall have timely access to client identification data and CDD information, transaction records and other relevant information. The Principal Officer appointed by SCSPL at Corporate Office for this purpose will advise you further in the matter.
- 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

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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.

In the above case the company would freeze the account of the client immediately and would inform client as well.

For guidance or reference, we normally use the SEBI website, FIU website and UN website to identify & scan all existing account 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 are also assessed.

Thanks and Regards,

Saurashtra Capital Services Pvt. Ltd.