

Anti-Money Laundering (AML) Policy

Objective of this Policy is to develop and implement and Counter-Terrorism Financing measures which can prevent IFCM Group from being misused for money laundering and terrorism financing activities.

The policy is being made to formulate necessary measures for prevention of Money Laundering activities and these measures include the following.

- Customer Identification Procedure: “Know Your Customer” norms
- Recognition, handling and disclosure of suspicious transaction
- Staff Training
- Maintenance of records

Key Policies

IFCM Group hereby adopts the following key policies. The Group and its employees/ officers/ authorities shall:

- Not knowingly launder money and have adequate procedures and controls to ensure that its business is not misused for money laundering and/or terrorist financing.
- Not advise customers on how to avoid identification, record keeping or reporting requirements.
- Not process a transaction unless it believes that it has a legitimate purpose.
- Comply with the laws of all countries involved in the transaction.
- Refuse obviously suspicious transactions.
- Report suspicious transaction in accordance with the applicable laws.
- Not split transactions to avoid government identification and reporting requirements or any policy of the concerned authority/party.
- Not knowingly record false names or information.
- Not create false records.
- Co-operate with local regulators and law enforcement bodies.
- Maintain records in accordance with the law and concerned authorities.
- Ensure that its entire staff receives regular anti-money laundering training and that attendance at such training is documented.

Know Your Customers (KYC)

All IFCM Group employees, engaged in the money transfer/changing services shall execute any transaction only after verifying and obtaining a photocopy of a valid identification proof of the customer.

- IFCM Group will retain photocopies of proof of identification after verifying the document in original.
- If a transaction is being undertaken on behalf of another person, identification evidence of all the persons concerned should be obtained and kept on record by IFCM Group.
- Before completing the transaction, it is compulsory for IFCM Group to review the customer for the following:

Collect and Verify

- 1 Customer's full name
- 2 Date of birth
- 3 Residential address

Suspicious Transactions

- Customer is reluctant to provide details/ documents on frivolous grounds.
- The transaction is undertaken by one or more intermediaries to protect the identity of the beneficiary or hide involvement.
- Large cash transactions.
- Size and frequency of transactions is high considering the normal business of the customer.
- Change in the pattern of business transacted etc.

If IFCM Group finds any symptom of suspicious transaction in any transaction then it should be reported to prescribed authority.

Purchase of Foreign Exchange

- For purchase of foreign exchange less than USD \$200 or its equivalent, photocopies of the identification document need not be kept on record. However, full details of the identification document should be maintained.
- For encashment of foreign exchange between USD \$200 and USD \$ 2000 or its equivalent, the photocopies of the identification document should be maintained for one year and completion of statutory audit.

- For encashment in excess of USD \$2000 or its equivalent, the photocopies of the identification document should be maintained for a minimum period of five years.
- Payment of sale proceeds in cash: Requests for payment of sale proceeds in cash may be acceded to extent of USD \$ 1000 or its equivalent per transaction.
- All encashment within one month may be treated as single transaction for the purpose.
- In all cases of payment should be made by way of “Account Payee” cheque/ demand draft only.

Sale of Foreign Exchange

- In all cases of sale of foreign exchange, irrespective of the amount involved, for identification purpose the passport of the customer should be insisted upon.
- The sale of forex should be made only on personal application and identification.
- All purchases by a person within one month may be treated as single transaction for the purpose.

Reporting Suspicious Activity

- To the extent possible, all suspicious transactions shall be reported to the Compliance Officer before they are undertaken.
- Full details of all suspicious transactions, whether put through or not, should be reported, in writing, to the Compliance Officer.

Reporting Suspicious Activity

The company will have an ongoing training program for the following purposes:

- For the consistent implementation of the Anti-Money Laundering measures.
- For giving the necessary training to all IFCM Group employees to make them aware of the policies and procedures relating to prevention of money laundering and the need of monitoring all transactions to ensure that no suspicious activity can be undertaken under the guise of money change.
- To give the training to the staff for the necessary steps to be taken when they come across any suspicious transactions such as asking questions about the source of funds, checking the identification documents carefully, reporting immediately to the Compliance Officer.

Maintenance of Records

The following documents will be preserved for a minimum period of five years:

- Records including identification obtained in respect of all transactions.
- Details of all suspicious transactions reported in writing or otherwise to the Compliance Officer.
- All correspondence/ report with the appropriate authority in connection with suspicious transactions.