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PREVENTION OF MONEY LAUNDERING (PML) POLICY

INTRODUCTION

This Policy has been framed by Fortune Wealth Management Company India Private Limited (FORTUNE WMC) in order to comply with the applicable Anti Money Laundering Standards and to take measures to prevent Fortune Wmc from being used as a vehicle for Money Laundering and Terrorist Financing.

Money Laundering and Terrorist Financing

Money laundering is the process by which the illegal origin of wealth is disguised to avoid suspicion of law enforcement authorities and to wipe out the trail of incriminating evidence.

Terrorists and terrorist organisations though may not be keen to disguise the origin of their money but would be interested in concealing the destination and the purpose for which the money is collected. Therefore terrorists and terrorist organization could also employ techniques to hide and disguise money. Governments around the world recognize the corrosive dangers that unchecked money laundering poses to their economic and political systems and have prescribed acts, rules and regulation for prevention of money laundering.

Need for this Policy

In India, The Prevention of Money Laundering Act, 2005 forms the core of the legal framework to combat money laundering and terrorist financing in India. The Prevention of Money Laundering Act, 2005 came into effect from 1st July 2005 and has been amended on various occasions since.

The Prevention of Money Laundering Act, 2005 imposes an obligation on every banking company, financial institution (which includes chit fund company, a co-operative bank, a housing finance institution and a non-banking financial company) and intermediary (which includes a stock-broker, sub-broker, share transfer agent, banker to an issue, trustee to a trust deed, registrar to an issue, merchant banker, underwriter, portfolio manager, investment adviser and any other intermediary associated with securities market and registered under Section 12 of the SEBI Act) , to verify the identity of investors and maintain records of transactions as specified in the Prevention of Money Laundering Act, 2005 and the Rules, Regulations and Notifications thereunder.

Pursuant to recommendation made by Financial Action Task Force (FATF) on Anti Money Laundering Standards(AML), Securities and Exchange Board of India (SEBI) had issued guidelines on AML vide their notification No. ISD/CIR/RR/AML/1/06 dated January 18, 2006 and vide letter no ISD/CIR/RR/AML/2/06 dated March 20, 2006 had issued obligations of the intermediaries registered under section 12 of SEBI Act 1992, As per these guidelines, all intermediaries have been advised to ensure that proper policy frameworks are put in place as per the guidelines on AML notified by SEBI.

Fortune WMC is an intermediary in the securities market registered with the Securities and Exchange

Board of India as a Stock Broker, Portfolio Manager and a Depository Participant and is thus required to adopt and implement a policy for Prevention of Money Laundering pursuant to the Prevention of Money Laundering Act, 2005 and the Rules, Regulations and Notifications thereunder.

POLICY OBJECTIVES:

This Policy aims to achieve the following objectives:

- To protect *the Company* from being used as a vehicle for money laundering/terrorist financing
- To follow thorough “Know Your Customer” (KYC) policies and procedures in the course of day-to-day business.
- To take appropriate action, once suspicious activities are detected, and report them to the designated authorities in accordance with applicable law / laid down procedures.
- To comply with applicable laws as well as norms adopted internationally with reference to Money Laundering.

APPLICABILITY:

This Policy applies to

1. All employees of Fortune WMC including employees at Head Office, Branches and also covers employees on deputation, outsourced employees, business associates and agents dealing with the Company.
2. Broking,PMS,Fund management and Depository Participant activities

IMPLEMENTATION OF THIS POLICY

Appointment of Designated Director

The Managing Director and CEO will be the Designated Director for the Purpose of Prevention of Money Laundering and shall be responsible for overall compliance of the provisions of the Prevention of Money Laundering Act, 2005 and the Rules, Regulations and Notifications thereunder.

Appointment of Principal Officer

The Chief Financial Officer/Director/Senior Official will be the Principal Officer for the Purpose of Prevention of Money Laundering and shall:

- ❖ Be responsible for compliance of the provisions of the Prevention of Money Laundering Act, 2005 and the Rules, Regulations and Notifications there under
- ❖ Act as a central reference point and play an active role in identification & assessment of potentially suspicious transactions
- ❖ Ensure that the Company discharges its legal obligation to report suspicious transactions to the concerned authorities.
- ❖ Should review the client’s financial status on a regular basis.
- ❖ Should check periodically the deliveries given by the client are coming from their own DP account and the cheques for payin are fom their own bank account.
- ❖ Should periodically monitor the transactions of the high networth Clients and give report to management.
- ❖ The company should not due any cash transactions with the clients.

- ❖ Monitor the implementation of Prevention of Money Laundering Policy
- ❖ Report transactions and sharing of information as required under the law and to the Management of the Company/FIU from time to time as deemed necessary.
- ❖ Provide clarifications on the provisions of the Act, Rules, Guidelines and the Policy of the company pertaining to Prevention of Money Laundering

The Principal Officer shall report to the Managing Director and CEO of the Company. Any change in Principal Officer shall be with the written approval of the Managing Director only.

THE CUSTOMER DUE DILIGENCE PROCESS INCLUDES THREE SPECIFIC PARAMETERS:

- A. Policy for Acceptance of Clients
- B. Client Identification Procedure
- C. Suspicious Transactions identification & reporting

A.Customer Acceptance Policy

1.11 KYC procedure compliance: The clients who are able to comply with KYC procedures laid down would only be accepted, KYC and MCA forms are to be completely filled up by client. All photocopies submitted by client must be verified with originals. The client should be met by branch manager or Dealer in person compulsorily.

1.12 Introduction: The details of person introducing prospective client should be recorded and it should preferably be an existing client.

1.13 Not to accept the client having criminal background: Check if the identity of client matches with person having criminal background, whether exists in debarred entities, whether any civil or criminal proceedings against client by any enforcement or regulatory agencies.

1.14 Special care shall be taken for clients in special category which are

1.14.1 Non Resident Clients

1.14.2 High Net worth Clients

1.14.3 Trust, Charities, NGOs and Organizations receiving donations

1.14.4 Companies having close family shareholdings or beneficial ownership

1.14.5 Politically exposed persons (PEP) or persons of foreign origin

1.14.6 Current / Former Head of State, Current / Former Senior high profile politicians and connected persons (Immediate family, Close advisors and companies in which such individuals have interest or significant influence)

1.14.7 Companies offering foreign exchange offerings.

1.14.8 Client in high risk countries (Where existence / effectiveness of money laundering controls is suspect, where there is unusual banking secrecy, Countries active in narcotics production Countries with 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, countries where fraud is highly prevalent.

1.14.9 Non face to face Client

1.14.10 Clients with dubious public reputation as per public information available etc.,

Benami Accounts: No account is opened in a fictitious / benami name or on an anonymous basis.

Debarred Clients: Before clients opens an account check whether the client's name matches with names in any of the following lists:

- SEBI Debarred List
- UNSC List
- PEP
- Any list issued by Government of India
- such other list that may be specified by the Regulators/Compliance Department from time to time
- Do not open accounts with a known criminal background.

B. Customer Identification Policy

The following Customer Identification Norms shall be adhered to in respect of all new clients to establish the identity of the client along with firm proof of address to prevent opening of account which is fictitious/benami/anonymous in nature.

SEBI/the Stock Exchanges/the Depositories and other regulatory authorities under which Fortune wmc is governed from time to time specify various KYC norms/guidelines that have to be adhered to in order to be able to Identify Customers. Such Norms and guidelines should be followed scrupulously at the time of customer acceptance.

The first requirement of customer identification procedure is to be satisfied that a prospective customer is who he/she claims to be.

The second requirement of customer identification procedures is to ensure that sufficient information is obtained on the nature of the business that the customer expects to undertake and any expected or predictable pattern of transactions. The information collected will be used for profiling the customer.

Basic KYC Norms to be followed for verification / scrutiny

- a) The photograph in the PAN card and in any other address proof which contains a photograph must match. This should be followed to ensure that no account is opened in anonymous or fictitious names.
- b) As per SEBI, NSDL, NSE & BSE guidelines, all Address and Identification proofs, should be verified with the originals by any of the employee of Fortune WMC. Care should be taken that the employee, who is verifying the copies of the proofs, should be competent to do the same.
- c) In-Person verification of Applicant (s) made compulsory as per SEBI, Exchanges and NSDL norms should be done by an employee of Fortune WMC only or as specified by the Regulators from time to time. The client should visit the Branch or the authorised official may visit the client at the residence/office to complete the in-per verification procedures..
- d) Proof should be collected for both permanent address and correspondence address and the

same should be verified with originals.

- e) Notwithstanding the above, the Company prohibits doing business with any individual or entity whose identity cannot be determined or who refuses to provide information or who have provided information that contains significant inconsistencies which cannot be resolved after due investigation.
- f) Verify whether any of the existing Client or new Applicant, falls within the UN sanction list and/ or is debarred by SEBI from dealing in securities. In this case, if any of the Existing Client falls in either of the categories, the said Client would be suspended from trading immediately & the matter would be reported to the concerned Regulatory Authority if required. In case of new applicant falling within the category, such account should not be opened. Clients name in the regulatory orders issued by the exchanges on a day to day basis should be barred from trading with immediate effective.
- g) In case of Non Resident clients, remittance only from approval banking channels will be accepted. In case of FII's, the investment must be from the current account maintained with the Reserve Bank of India.
- h) Clients should not be activated to trade in derivative segment unless the clients submit a valid proof of financial information.

The above constitutes our KYC norms and will be strictly followed so that the Company has no doubt about the Client identity. The account of any existing Client not able to satisfy his/her identity will be frozen till identity is established

These norms may be changed by Compliance Department from time to time to adhere regulatory requirements and to have stringent anti money laundering measures.

Filing with Central KYC

The Company shall within ten days after the opening of an account of a client, file the electronic copy of the client's KYC records with the Central KYC Records Registry.

The Company shall notify the KYC identifier provided by the Central KYC Records Registry to the Client.

Where a client, submits a KYC Identifier to the Company, the Company shall retrieve the KYC records online from the Central KYC Records Registry by using the KYC Identifier and shall not require a client to submit the same KYC records or information or any other additional identification documents or details, unless –

- (i) there is a change in the information of the client as existing in the records of Central KYC Records Registry;
- (ii) the current address of the client is required to be verified;
- (iii) the Company considers it necessary in order to verify the identity or address of the client, or to perform enhanced due diligence or to build an appropriate risk profile of the client.

After obtaining additional or updated information from a client the Company shall update the existing KYC records of the client with the Central KYC Records Registry.

Fortune WMC shall not use the KYC records of a client obtained from the Central KYC Records Registry for purposes other than verifying the identity or address of the client and shall not transfer KYC records

or any information contained therein to any third party unless authorised to do so by the client or by the concerned Regulator/ Authority.

Ongoing Customer Due Diligence

- Any communication in respect of the Client shall be with the Client only
- Trade Orders/Instructions shall be accepted from the Client only.

- The Employees of the Company and the Clients shall adhere to the guidelines issued by the Company in this regard from time to time.

- Perform ongoing scrutiny of the transactions and account throughout the course of the business relationship to ensure that the transactions being conducted are consistent with the registered intermediary's knowledge of the client, its business and risk profile, taking into account, where necessary, the client's source of funds; and

- The CDD process shall necessarily be revisited when there are suspicions of money laundering or financing of terrorism (ML/FT).

- **Updation of Customer Information:** Updated documents, data or information of all clients and beneficial owners collected under the Client Due Diligence process shall be called for from the clients:
 - i. On an annual basis- at the beginning of the financial year
 - ii At the time of reactivation of inactive clients

1. RISK PROFILING OF CLIENT

All clients should be categorized on the basis of the risk of money laundering or terrorist financing that they are likely to pose. The clients can be classified into the medium or high risk category depending on various criteria like Client wise Large Turnovers, particular Script exposure / trading , client's income range , trading pattern, client is of special category. If any of the client would satisfy the above criteria, depending on the criteria satisfied the same would be classified into medium or high risk.

Clients should broadly be classified in the following categories:

Low Risk	Clients who pose low or nil risk. They are clients who have a respectable social and financial standing. Clients who fulfill obligations on time.
Medium Risk	Intraday clients or speculative client.
High Risk	Clients who have defaulted in the past. Clients who have a suspicious background. Clients of Special Category High Network Clients with Average Daily Turnover of 1. For Derivatives Segment > 800 lakhs 2. For CM segment > 500 lakhs

As per clause 2.2.4 and 2.2.5 of Guidelines on detecting suspicious transactions under Rule 7 (3) of the PML Rules,2005.

The following shall also be categorized as High Risk Clients/Transactions

Clause 2.2.4

- Countries subject to sanctions, embargoes or similar measures issued by, for example, the United Nations (“UN”). In addition, in some circumstances, countries subject to sanctions or measures similar to those issued by bodies such as the UN, but which may not be universally recognized, may be given credence by a company because of the standing of the issuer and the nature of the measures.
- Countries identified by the Financial Action Task Force (“FATF”) as non-co-operative countries and territories (NCCT) in the fight against money laundering or identified by credible sources as lacking appropriate money laundering laws and regulations
- Countries identified by credible sources as providing funding or support for terrorist activities.
- Countries identified by credible sources as having significant levels of corruption, or other criminal activity.

Clause 2.2.5

- Cash (and cash equivalent) intensive businesses
- Money services businesses (remittance houses, money transfer agents and bank note traders
- Casinos, betting and other gambling related activities, or
- businesses that while not normally cash intensive, generate substantial amounts of cash for certain transactions.
- Unregulated charities and other unregulated “not for profit” organisations (especially those operating on a “cross-border “basis)
- Dealers in high value or precious goods (e.g. jewel, gem and precious metals dealers, art and antique dealers and auction houses, estate agents and real estate brokers).
- Clients that are politically exposed or “PEPs”

Other factors like clients’ location (registered office address, correspondence addresses and other addresses if applicable), nature of business activity, trading turnover etc. and manner of making payment for transactions undertaken shall also be considered while assessing the risk posed by the client.

The above categorization shall be done initially at the time of opening of the Clients account and shall be reviewed on an ongoing basis depending of the trading pattern etc. of the clients.

Initial Risk categorization of all the clients would be done by the Account Opening Team depending on the financials details/ networth declarations and KYC declaration of the clients given by the clients at time of account opening and regular updates received from the clients. Branch Officials shall inform Account Opening team in the event they feel the client belongs to the Medium or High Risk Category and specify reasons for the same. Risk categorization would also be modified depending on the trading patterns of the clients.

High degree of due diligence shall be applied in respect of clients of special category and clients categorized as “High Risk Clients”.

Instructions on risk parameters may be given by the Principal Officer/Compliance Team from time to time.

The internal Auditors shall conduct the audit based on the Risk parameters assigned by the Management from time to time.

SUSPICIOUS TRANSACTIONS

Suspicious transactions involve funds which are derived from illegal activities or are transactions that are intended/ conducted in order to hide or disguise funds or assets derived from illegal activities (including, without limitation, the ownership, nature, source, location, or control of such funds or assets) as part of a plan to violate or evade any law or regulation or to avoid any transaction reporting requirement under the law;

The transaction has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the financial institution knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.

Criteria giving rise to suspicion:

It is difficult to define exactly what constitutes suspicious transactions and as such given below is a list of circumstances where transactions may be considered to be suspicious in nature. This list is only inclusive and not exhaustive.

1. Complex /unusually large transactions/ patterns which appear to have no economic purpose.
2. Client having suspicious background or links with known criminals
3. Clients whose identity verification seems difficult.
E.g.:
 - i. False identification documents
 - ii. Identification documents which could not be verified within reasonable time
 - iii. Non face to face Client
 - iv. Doubt over the real beneficiary of the account
 - v. Accounts opened with names very close to other established business entities.
4. Client appears not to co-operate.
5. Use of different accounts by Client alternatively.
6. Sudden activity in dormant accounts
7. Multiple accounts
 - i. Large number of account having a common account holder, authorized signatory with no rationale
 - ii. Unexplained transfers between multiple accounts with no rationale
8. Substantial increase in business without apparent cause (Unusual activity compared to past transactions)

9. Activity materially inconsistent with what would be expected from declared business
10. Inconsistency with clients apparent financial standing
11. In any account circular trading
12. Unusual transactions by Clients of Special Category (CSCs) and business undertaken by shell corporations, offshore banks/financial services, businesses reported to be in the nature of export-import of small items
13. A transaction which appears to be a case of insider trading
14. Transactions that reflect likely market manipulations
15. Suspicious off market transactions
16. Inconsistency in the payment pattern by the client
17. Trading activity in account of high risk clients based on their profile, business pattern and industry segment
18. Large deals at prices away from the market
19. Multiple transactions of value just below the threshold limit specified in PMLA so as to avoid possible reporting;
20. Clients based in high risk jurisdictions;
21. Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
22. Attempted transfer of investment proceeds to apparently unrelated third parties

11. Suspicious transactions monitoring, reporting and record keeping:

All are requested to analyze and furnish details of suspicious transactions, whether or not made in cash. It should be ensured that there is no undue delay in analysis and arriving at a conclusion.

11.1 Gives rise to reasonable ground of suspicion that it may involve the proceeds of crime Appears to be made in circumstance of unusual or unjustified complexity. Appears to have no economic rationale or bonafide purpose.

11.2 What to Report

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 reason of suspicion.

11.3 The Processes for alert generation, examination and reporting include Audit trail for all alerts generated and reported to Principal officer of the Company. The principal officer will report to FIU if required as per the observations received from authorities like NSE, BSE and CDSL.

11.4 We ensure compliance with the record keeping requirements contained in the SEBI Act, 1992, Rules and Regulations made there-under, PLM act, 2002 as well as other relevant legislation, Rules, Regulations, Exchange Bye-laws and Circulars and the following records are being maintained by the Company:

- a) the beneficial owner of the account;

- (b) the volume of the funds flowing through the account; and
- (c) for selected transactions:
 - the origin of the funds;
 - the form in which the funds were offered or withdrawn, e.g. cheques, demand drafts etc.
 - the identity of the person undertaking the transaction;
 - the destination of the funds;
 - the form of instruction and authority.

We shall ensure that all client and transaction records and information are available on a timely basis to the competent investigating authorities where ever required. The investigating authority 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.

Any suspicious transaction shall be immediately notified to the Principal officer. The notification may be done in the form of a detailed report with specific reference to the clients, transactions and the nature /reason of suspicion. However, 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. 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.

Review of Alerts: at the time of reviewing of alerts, the following aspects should also be considered:

- Updated financial information of client details before filing an STR
- Details of occupation of the client.
- Giving details of the scrip, price movement of the scrip, value of transaction, details of holding including duration and any corporate actions
- Creating a watch list of clients based on own experience, risk categorization, parties penalized by SEBI and related accounts.

Suspicious transactions shall be regularly reported to the Principal Officer. There shall be continuity of dealing with the client & client shall not be informed of the Report.

The Compliance Team shall randomly examine selection of transactions to comment on their nature.

The Principal Officer / Compliance Officer (as directed by Principal Officer) may from time to time issue directions / clarifications to respective internal departments in respect of monitoring of transactions.

Freezing of demat accounts

Company will freeze the demat accounts of demised BOs upon receiving authentic intimation and will be updated with KRA to avoid unauthorized transactions in the demat account.

POLICY FOR DORMANT ACCOUNTS

The following accounts shall be categorized as Dormant Accounts:

I. Demat accounts

A Demat account having no debit transactions in the last 6 (six) calendar months shall be classified as Dormant account.

II. Trading account

A Trading account in which no trades have been carried out for a period of more than 12 (twelve) consecutive months shall be classified as a Dormant Account.

TREATMENT OF DORMANT ACCOUNTS

Transactions in Dormant Trading Accounts

- In case of Online or Offline dormant trading accounts in which no trade has been placed during the last 12 (twelve) consecutive months , the account of the client shall be disabled for trading and the client shall not be permitted to execute a fresh transaction in the account unless the client provides a written request to reactive the account and process the transaction duly signed by Client and submitted to Fortune wmc or by placing the request for activation through the Client's login on the Online Trading Portal of the Company.

Any further trading by such client should be allowed only after undertaking sufficient due diligence (including IPV) and obtaining the updated information related to KYC from the concerned Client.

MONITORING OF TRANSACTIONS IN DORMANT ACCOUNTS

Sudden activity in dormant accounts should be scrutinized .

Any debit transactions in dormant Demat accounts or any transactions in dormant Trading accounts shall be reported as an Alert and adequate reports shall be generated

- Such alerts/reports shall be reviewed by the Authorised Official

- Transactions found to be suspicious shall immediately be reported to the Risk Management and Compliance Department

- Evaluation for dormant account will be done periodically

Debit transactions shall be permitted in dormant demat accounts only on completion of the following procedure:

- The physical DIS received for transaction in a dormant account shall in addition to the normal verification process also be verified by another employee (additional check)

- Independent confirmation shall be obtained from the client before processing of the DIS

- The Employee verifying such transaction with the Client shall record the details of the process, date, time etc. of verification on the Instruction Slip under his signature

OTHERS

Return of Assets: The Balances lying in the Dormant Trading accounts shall be returned to the

client at the time of the calendar quarterly/monthly settlement. In the event the client wishes to receive the funds/securities from such Trading account before the calendar quarterly/monthly settlement, the Client shall make a request in writing which shall be submitted to Fortune Wmc. The funds/securities from such Trading account shall be returned on T+1 day from receipt of request.

EMPLOYEES HIRING, TRAINING AND INVESTOR EDUCATION:

Hiring of Employees: We shall have adequate screening procedures in place to ensure high standards when hiring employees, having regard to the risk of money laundering and terrorist financing and the size of the business, we ensure that all the employees taking up such key positions are suitable and competent to perform their duties.

On going training to Employees:

- 1) Importance of PMLA Act & its requirement to employees through training.
- 2) Ensuring that all the operating and management staff fully understands their responsibilities under PMLA for strict adherence to customer due diligence requirements from establishment of new accounts to transaction monitoring and reporting suspicious transactions to the FIU.
- 3) Organising suitable training programmes wherever required for new staff, front-line staff, sub-brokers, supervisory staff, controllers and product planning personnel.

Investor Education

Fortune wmc shall from time to time prepare specific literature/pamphlets etc, to educate their clients the objectives of the AML/CFT program.

Audit/Testing of Anti Money Laundering Program.

The Anti Money Laundering program is subject to periodic audit ,specifically with regard to testing its adequacy to meet the compliance requirements. The audit/testing is conducted by member's own personnel not involved in framing or implementing the AML program or it may be done by a qualified third party. The report of such an Audit/testing is placed before the senior management for making suitable modifications/improvements in the AML program.

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 <http://www.un.org/sc/committees/1267/consolist.shtml>. Fortune Wealth Management Co. India Pvt Ltd will ensure that accounts are not opened in the name of anyone whose name appears in said list. Fortune Wealth Management Company India Pvt Ltd 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 shall immediately be intimated to SEBI and FIU-IND.

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 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.

REPORTING OF SUSPICIOUS TRANSACTION

The 'Principal Officer' shall report the information relating to suspicious transactions not later than seven working days on being satisfied that the transaction is suspicious to the Director, Financial Intelligence Unit-India (FIU-IND) at the following address as may modified by the SEBI from time to time or in such form as may be required by the FIU from time to time:

Director, FIU-IND,
Financial Intelligence Unit-India,
6th Floor, Hotel Samrat,
Chanakyapuri,
New Delhi - 110021
Website: <http://fiuindia.gov.in>

Details of the Principal Officer

Mrs LANA JOSE- Director
FORTUNE WEALTH MANAGEMENT CO. INDIA PVT. LTD.,
1056, Avinashi Road,
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Details of the Designated Director :

Mr Jose C Abraham, Managing Director
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Review of the Policy:

The policy will be reviewed on yearly basis. This Policy was last reviewed on 30.03.2024

Policy Prepared by: Rathnamala. V
Compliance Officer

Policy Reviewed by: Jose C Abraham
Managing Director