



# MANOG SECURITIES PVT. LTD.

(MEMBER : NATIONAL STOCK EXCHANGE OF INDIA LTD.)

CIN : U74899DL1994 PTC061419

## AML / PMLA Policy

Anti-Money Laundering | KYC | STR/CTR | FINnet 2.0

Entity Name	Manog Securities Private Limited
SEBI Registration No.	INZ000278434
Designated Director	Mr. Vivek Gupta
Principal Officer	Mr. Vivek Gupta
FINnet 2.0 User ID	gvivek@hotmail.com
Date of Adoption	23-JAN-2026

### 1. Policy Statement and Regulatory Basis

Manog Securities Pvt Ltd is a SEBI-registered Stock Broker conducting client-facing broking and proprietary trading. This Policy is adopted in compliance with:

- Prevention of Money Laundering Act, 2002 (PMLA) and PML (Maintenance of Records) Rules, 2005
- SEBI Master Circular SEBI/HO/MIRSD/MIRSD-PoD/P/CIR/2025/90 dated June 17, 2025 — paras 69-73
- SEBI Circular ISD/AML/CIR-2/2009 dated October 23, 2009 — Section 51A, UAPA 1967
- FIU-IND Guidelines on STR/CTR reporting via FINnet 2.0 portal

### 2. Designated Director and Principal Officer

Designated Director: **Mr. Vivek Gupta** — overall compliance with Chapter IV, PML Act 2002.

Principal Officer: Mr. Vivek Gupta — files STRs/CTRs via FINnet 2.0, maintains the FIU-IND register, and acts as the central AML reference point for the Firm.

### 3. Risk-Based Approach — Client Categorisation

All clients shall be categorised as High, Medium, or Low risk:

Category	Criteria	Due Diligence Level
Low Risk	Salaried individuals, government employees, known local clients with regular trading pattern	Standard CDD — KYC at opening; review every 5 years
Medium Risk	Self-employed, small business owners, irregular trading pattern	Enhanced CDD — additional income proof; review every 2 years
High Risk / CSC	PEPs, NRIs, HNIs, NGOs, Trusts, high-risk jurisdiction clients, complex ownership	Full EDD — senior management approval; review annually

#### 3.1 Clients of Special Category (CSC)

- Non-Resident clients (NRI / OCI / PIO / FPI)
- High Net Worth Individuals (HNIs)
- Trusts, Charities, and NGOs receiving donations
- Politically Exposed Persons (PEPs) — domestic and foreign — and their immediate family / close associates
- Clients in high-risk jurisdictions (unusual banking secrecy, high corruption index, sanctions-listed countries)
- Non-face-to-face clients and clients with adverse regulatory/criminal history

### 4. Client Due Diligence (CDD)

#### 4.1 Standard CDD

- Verify identity using PAN, Aadhaar, Passport, or Voter ID — original documents to be seen before accepting copies

- Verify residential address using independent proof
- Identify beneficial ownership where account is held for a third party
- Obtain financial information to assess source of funds

#### 4.2 Enhanced Due Diligence — for High Risk / CSC

- Senior management approval (Compliance Officer) before account opening
- Verification of source of funds and source of wealth
- Enhanced ongoing transaction monitoring
- Re-approval required if client is subsequently identified as PEP

### 5. Sanctions Screening

- UN Security Council Consolidated Sanctions List:  
<https://www.un.org/securitycouncil/sanctions/information>
- Government of India / MHA / MEA sanctions under Section 51A of UAPA 1967
- SEBI notifications on sanctions (SEBI Circular ISD/AML/CIR-2/2009 and updates)

Frequency: at account opening, on any KYC change, and annually for all active clients.

### 6. Transaction Monitoring

- Monitor all client transactions against profile, declared source of funds, and expected trading pattern
- Flag complex, unusually large transactions or patterns with no apparent economic purpose
- Dormant account activation — any debit activity triggers an immediate alert to the Compliance Officer
- Maintain records per PML Rule 3: nature, amount, currency, date, and parties to each transaction

### 7. Suspicious Transaction Reporting (STR)

File STR with FIU-IND via **FINnet 2.0 portal** within **7 days** of arriving at a conclusion of suspicion — irrespective of transaction amount.

## 7.1 Illustrative Indicators

- Client identity verification appears difficult or client does not cooperate
- Source of funds inconsistent with declared profile
- Unexplained large increase in trading activity
- Large transfers to/from overseas locations with cash payment instructions
- Sudden trading in dormant accounts

## 7.2 Filing Process

- Report to Principal Officer within **24 hours** of suspicion
- STR filed on FINnet 2.0 within **7 days** of conclusion

**TIPPING OFF — STRICTLY PROHIBITED:** TIPPING OFF: No Director, Officer, or Employee shall disclose that an STR has been or is being filed. This is a criminal offence under PML Act Section 23.

## 8. Cash Transaction Report (CTR)

File CTR with FIU-IND via FINnet 2.0 within **15 days** of month-end for:

- All cash transactions exceeding Rs. 10 lakh or equivalent in foreign currency
- Series of connected cash transactions in one month aggregating more than Rs. 10 lakh
- Any transaction involving forged/counterfeit currency or forgery of a valuable security

## 9. Record Retention

Record Type	Retention Period
KYC / Client identification documents	5 years from cessation of client relationship
Transaction records	5 years from date of transaction
STR / CTR copies	5 years from date of filing
Sanctions screening records	5 years from each screening date
AML training records	5 years

## 10. Staff Training

- Induction training for all new employees within **30 days** of joining
- Annual refresher — minimum **2 hours**: PMLA updates, FINnet 2.0 procedure, sanctions screening, STR indicators
- Training records maintained for 5 years

## Policy Review

Last Reviewed	11-FEB-2026
Reviewed By	Pawan Pratap Singh (Compliance Officer)
Approved By	Director

For and on behalf of: Manog Securities Pvt Ltd

Authorised Signatory	Mr. Vivek Gupta
Designation	Director
Date	11-FEB-2026
Signature	 <b>For Manog Securities Pvt. Ltd.</b> <b>Director</b>