

**THE BROKER [ANTI- MONEY LAUNDERING (AML)/ COUNTERING FINANCING OF
TERRORISM (CFT)] POLICY
UPDATED IN LINE WITH
THE SECP (ANTI MONEY LAUNDERING AND COUNTERING FINANCING FOR TERRORISM)
REGULATIONS, 2020
ESTABLISHED UNDER
ANTI MONEY LAUNDERING ACT, 2010
DEVELOPED UNDER
THE SECP GUIDELINES ON ANTI-MONEY LAUNDERING, COUNTERING FINANCING OF TERRORISM
AND PROLIFERATION FINANCING (UPDATED APRIL, 2020)**

2024

VERSION - 1

Dated Jun 10, 2024

"The Policy document is for internal use of staff of **ENRICHERS SECURITIES (PRIVATE) LIMITED** and should be accorded the same level of secrecy as is done for other internal policies of the Brokerage House. Copies of this document should not be shared prior to the approval of the competent authority."

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DOCUMENT CONTROL SHEET

Title of the Policy	Anti-Money Laundering (AML) / Countering Financing of Terrorism (CFT) Policy, Procedures and Controls
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Concurred by	Chief Executive Officer
Recommended By	Compliance Officer
Approved By	Board of Directors
Board's Approval Date	Jun 20, 2024

1. PURPOSE

Formulation and revision of this policy is in line with requirements of Anti-Money Laundering (AML) Act 2010, Anti-Terrorism Act (ATA) 1997 and applicable SECP [Anti Money Laundering (AML) / Countering Financing of Terrorism (CFT)] Regulations, 2020 & SECP Guidelines on Anti-Money Laundering, Countering Financing of Terrorism and Proliferation Financing (**updated April 2020**) on Risk Based Approach amended from time to time, United Nations Security Council (Freezing & Seizure) Order, 2019 and NACTA Guidelines on Actions to be taken by Competent Authorities for Implementation of United Nation Security Council Resolution No. 1373 along with international best practices, to prevent the possible use of Brokerage House as a conduit for Money Laundering or Terrorist Financing activities.

Amid increasing focus of Securities Brokers and regulatory bodies on curbing Money Laundering (ML) / Terrorist Financing (TF) and Proliferation Financing (PF) activities, Securities Brokers are required to have comprehensive AML / CFT Policy entailing the following guidelines on the Broker's ML/TF/PF risk management approach to identify, assess, manage and mitigate these risks on an ongoing basis.

The Securities Brokers are required to manage these risks throughout the life cycle of its customers related to channels/products/jurisdictions/services and relationships, starting from onboarding of new business relationships till closure as well as for all walk in or occasional customers.

In addition to the above, the international AML / CFT standards such as Financial Action Task Force (FATF) and Asia Pacific Group (APG) on Money Laundering on Customer Due Diligence, and United Nations (UN) resolutions concerning sanctions are to be followed to prevent the possible use of the Broker as a conduit for money laundering or terrorist financing activities.

To further strengthen the regulatory framework to curb Money Laundering and Terrorist Financing, the SECP has issued AML/CFT Regulations and its subsequent amendments from time to time, covering the following aspects:

2. BRIEF ON SECP AML/CFT REGULATIONS FOR SECP REGULATED PERSONS ("RPs"):

Regulation	Areas Covered
CHAPTER –II – RISK ASSESSMENT AND MITIGATION	Risk Assessment; Risk Mitigation and Applying Risk Based-Approach; New Products, Practices and Techniques' Customer Due Diligence (CDD); Beneficial Ownership of Legal Person and Legal Arrangements; Identification of Beneficiary for Life Insurance or Takaful Policies; Enhanced Due Diligence (EDD); Politically Exposed Persons (PEP); Simplified Due Diligence (SDD); Reliance on Third Parties; Ongoing Monitoring; Reporting of Transactions (STRs/CTRs); and Counter Measures against High Risk Countries.
Regulation-4 Risk Assessment	<ul style="list-style-type: none"> Identifying, assessing and understanding Money Laundering (ML)/Terrorism Financing (TF) in relation to customers, their jurisdiction or countries, jurisdictions or countries RP has operations or dealings in, products, services, transactions and delivery channels RP is offering. This regulation also prescribes appropriate steps for identifying, assessing and

	understanding ML/TF risks.
Regulation-5 Risk Mitigation and Applying Risk Based Approach	Implementation of counter ML and TF measures to ML and TF Risk with respect to size of business of RP by developing and implementing policies, procedures and controls duly approved by RP's Board, monitoring their implementation, performing enhanced measures to manage and mitigate High Risk if identified, need of independent audit function to test the system.
Regulation-7 New Products, Practices and Technologies	<ul style="list-style-type: none"> • Identification and assessing ML and TF Risk that may arise in relation to New Products and Business Practices, use of new or developing technologies. • This Regulation prescribes undertaking risk assessment prior to launch of products, practices and technologies and taking measures to manage and mitigate their risks. • The Regulation also covers paying special attention to new products, business practices and new technologies that favor anonymity.
CUSTOMER DUE DILIGENCE (CDD) AND BENEFICIAL OWNERSHIP	
Regulation -8 Customer Due Diligence	<ul style="list-style-type: none"> • CDD measures for Identifying and Verifying New and Existing Customers and/or beneficial owners on the basis of documents, data or information obtained from customer and/or from independent sources before, during or after course of establishing a business relationship. • CDD measures for understanding and obtaining information on the purpose and intended nature of business relationship. • CDD measures also include monitoring of accounts/transactions on ongoing basis to ensure that these being conducted are consistent with RP's knowledge of customer, his business and risk profile including his source of funds and data/information for taking prompt action in case of material departure from usual and expected activity. • This Regulation covers the requirement of documents as per Annexure-I. • Prohibitions from establishing business relationship with entities and /or individuals that are DESIGNATED under UNSCR adopted by Govt. of Pakistan, PROSCRIBED under Anti-Terrorism Act, 1997 and associates/facilitators of DESIGNATED / PROSCRIBED entities/individuals. • Steps to determine the Person acting on behalf of a Customer including Authority, Identification and Verification of Authorized Person and the Customer. • Categorization of customers as High or Low Risk as outcome of CDD. • Maintaining list of Customers/Accounts where business relationships were refused or

	<p>needed to be closed on Negative Verification.</p> <ul style="list-style-type: none"> • Non-satisfactorily CDD measures, account shall be closed or business relationship terminated and considering to warrant STR. • Doubt of tipping-off the Customer due to CDD measure, filing STR without CDD process. • Govt. entities accounts to be opened on their own names operated by officers on production of Special Resolution or Authority from concerned Admin Dept. or Ministry duly endorsed by MoF or Finance Dept./Division of concerned Govt.
<p>RegulationS-13, 14, 16 & 17</p> <p>Beneficial Ownership of Legal Persons and Legal Arrangements.</p>	<p>Acquisition and usage of information and data from reliable sources for a Legal Person for following CDD measures/purposes: -</p> <ul style="list-style-type: none"> • Understanding its business nature, ownership and control structure; • Identifying and verifying identity of Natural Person who owns or ultimately has controlling ownership interest in Legal Person. • Where no Natural Persons are identified, identify the Natural Person having Executive Authority or equivalent or similar positions in the Legal Person. <p>Acquisition and usage of information and data from reliable sources for a Legal Arrangement for following CDD measures/purposes: -</p> <ul style="list-style-type: none"> • For Trusts, identification and verification of identity of the settler, the trustee, the protector, the beneficiaries and Natural Person exercising ultimate ownership and control over the Trust. • For other type, identification and verification of identity of the Natural Person having ultimate ownership and control over such Legal Arrangement.
<p>Regulation – 19</p> <p>Ongoing Monitoring including STRs and CTRs</p>	<ul style="list-style-type: none"> • Consistency of Transactions with RP’s Knowledge of Customer, its business and risk profile and source of funds (where appropriate). • Obtaining information and examine the background and purpose of all complex and unusual transactions having no apparent economic or visible lawful purpose and background. • Periodic review of information and beneficial owners and ensuring them up to date and relevant, by reviewing existing records, particularly of High-Risk Customer. • Revision of Customers’ profiles keeping in view the spirit of KYC/CDD and bases to be documented. • Filing of STR on reasonable grounds for suspension, RP may consider to retain the customer:

	<ul style="list-style-type: none"> ○ To substantial and document the reasons ○ Proportionate risk mitigation measures including Enhanced Ongoing monitoring. • Freezing of funds and assets of Designated/Proscribed entity/individual by UNSCR and Anti-Terrorist Act and their associates/facilitators and reporting to Commission. <p>Suspicious Transaction Reports (STRs) and Currency Transaction Reports (CTRs)</p> <ul style="list-style-type: none"> • Guidelines for Reporting of Complex, Unusually Large, and out of pattern Transactions and Currency Transactions.
<p>Regulation 20 – Existing Customers</p>	<ul style="list-style-type: none"> • CDD Requirements of Existing Customers on the basis of Materiality and Risk. • Blocking of Account of the customers, if customers fails to provide information / documents within One Month of the Notice. • Activation of In-active / Dormant Account subject to conduct of NADRA Verisys or Bio-metric verification and after obtaining attested copy of customers’ valid identity documents.
<p>Regulation – 21</p> <p>Enhanced Due Diligence (EDD) & Politically Exposed Persons (PEPs) and their Close Associates</p>	<ul style="list-style-type: none"> • Requirement of implementing Internal Risk Management Systems, Policies, Procedures and Controls for Customer having High Risk of ML/TF. • Circumstances where Customer presents High Risk of ML/TF also include: - <ul style="list-style-type: none"> ○ Customers belonging to non-compliant countries with AML Regulations according to FATF. ○ Body corporate, partnerships, associations and Legal Arrangements including NGOs and NPOs which receive donations. ○ Legal Person or Arrangement with complex ownership structure. • EDD measures in proportionate to risk posed to business relationship by Customer having High Risk or notified as having High Risk by SECP. • EDD measures include approval from Senior Management, establishing the Source of Wealth and/or Funds or Beneficial Ownership of Funds, enhanced monitoring of business relationship. • Requirement of Internal Risk Management Systems, Policies, Procedures and Controls for determining a Customer as PEP. • EDD Measures include approval from Senior Management, establishing the Source of Wealth and/or Funds or Beneficial Ownership of Funds, enhanced monitoring of

	<p>business relationship for: -</p> <ul style="list-style-type: none"> ○ In case of foreign PEPs; and ○ In case of domestic PEPs posing High Risk in business relationship in addition to other requirement of these regulations. <ul style="list-style-type: none"> • EDD Measures are applicable on family members and close associates of all PEPs.
<p>Regulation – 22</p> <p>Counter Measures Against High-Risk Countries</p>	<ul style="list-style-type: none"> • Adoption of counter measures including EDD proportionate to the Risk, to the business relationship and transactions with Customers belonging to High-Risk Countries called by FATF and/or notified by Fed. Govt.
<p>Regulation - 23</p> <p>Simplified Due Diligence</p>	<p>Where Low Risk is identified through risk analysis and adequate checks and controls, SDD or reduced CDD / KYC measures: -</p> <ul style="list-style-type: none"> • Decision to rate Low Risk a customer to justified in writing. • Low Risk cases may include: <ul style="list-style-type: none"> ○ RP and Banks subject to combat ML and TF requirements consistent with FATF recommendations and supervised. ○ Public Listed companies. ○ Insurance policies where annual premium is less than Rs. 100K or single premium is less than Rs. 250K. ○ Group Insurance policies ○ Pension superannuation or similar scheme providing retirement benefits to employees. ○ Financial products or services. • SDD measures include reducing identification updates, degree of ongoing monitoring and scrutinizing transactions and non-collection of specific information.
<p>Regulation – 24</p> <p>Reliance on Third Parties</p>	<ul style="list-style-type: none"> • Obtaining of identification information, beneficial ownership and/or business nature. • Provision of copies of identification data and other documents relating CDD requirement without delay.

	<ul style="list-style-type: none"> • Third party is regulated and supervised or monitored for. • Confidentiality and non-disclose agreement. • In case of third party of same financial group, CDD and record-keeping requirements and programs against ML and TF. • Ongoing monitoring and ultimate responsibility of AML/CFT obligation of RP.
TFS OBLIGATIONS	
<p>Regulation – 25</p> <p>TFS Obligation</p>	<p>Undertaking TFS obligations under United Nations (Securities Council) Act 1948 and /or Anti-Terrorism Act 1997 and Regulations made there under including:</p> <ul style="list-style-type: none"> • Develop mechanism, process and procedures for screening and monitoring customer, potential customers and their BOs/Associates to detect any matches or potential matches for designated / proscribed persons. • In case of positive or potential match, SB shall immediately: <ul style="list-style-type: none"> ○ Freeze relevant funds and assets, block transaction without prior notice; ○ Prohibit from making any funds or other assets, economic resources, or financial and other services and funds; ○ Reject the transaction or attempted transactions or the customer. ○ File a STR to FMU and notify the Commission; ○ Implement any other obligation under AML Act 2010, UNSC Act and Anti-Terrorism Act and any other regulations made thee under. • The Securities Broker is prohibited, on an ongoing basis, for providing financial services to proscribed /designated entities and person or those who are known for their association with such entities and persons.
CHAPTER III	
RECORD KEEPING	
<p>Regulation– 26</p> <p>Record Keeping</p>	<ul style="list-style-type: none"> • Maintenance & Retention of Customer and Transactions related records for minimum period of five (5) years from completion of the transaction. • Ensure of timely making available, all CDD and transaction record to Commission, FMU and LEAs, whenever required.

COMPLIANCE PROGRAM	
<p>Regulation – 27</p> <p>Compliance Program including screening and training of employees.</p>	<ul style="list-style-type: none"> • Mandatory need for appointment of management level CO, reportable to Board or to another equivalent executive position or committee; • Timely access of Customers’ record and relevant information. • Responsibilities of CO. • Screening procedures for hiring Employees. • Comprehensive Employee due diligence. • Suitable training program for relevant employees on annual basis.
<p>Regulation – 28</p> <p>Corporate Groups</p>	<p>Group-wise programs against AML/CFT which include the following measures:</p> <ul style="list-style-type: none"> • Policies and procedures for sharing information for CDD and ML/TF Risks management. • Group-level compliance, audit and/or AML/CFT functions, for Customers, Accounts and Transactions. • Adequate safeguard on confidentiality and use of information.
<p>Regulation – 29</p> <p>Foreign Branches including Financial Group</p>	<ul style="list-style-type: none"> • Need for paying attention to foreign branches and subsidiaries of RP which do not or insufficiently comply with FATF recommendations. • In case of difference in AML/CFT requirements in both jurisdictions, apply higher of two standards. • In case of conflict and inability to fully observe High Standards, RP shall report to Commission.
<p>Regulation – 30</p> <p>Correspondent Relationship</p>	<p>Measures to performed when forming a correspondent relationship:</p> <ul style="list-style-type: none"> • Assessing the suitability of respondent FI; • Understanding and documenting the respective AML/CFT responsibilities of FI and respondent FI. • Accessing respondent FI in context of sanctions/embargoes and Advisories about risk; • Approval from Senior Management before providing correspondent service to new FI. • Documentation of the basis of satisfaction.

	<ul style="list-style-type: none"> • Not entering or continuing correspondent relationship with Shell FI.
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3. SECP GUIDELINES FOR IMPLEMENTING AML/CFT REGULATIONS:

3.1 FIRST VERSION OF SECP GUIDELINES ON ANTI-MONEY LAUNDERING, COUNTERING FINANCING OF TERRORISM, AND PROLIFERATION FINANCING, 2018

In addition to the AML/CFT Regulations, the SECP issued its first Guidelines on September 18, 2018 on Implementation of AML/CFT Framework under the Securities and Exchange Commission of Pakistan (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2018 to strengthen trade related Anti Money Laundering/Countering Financing of Terrorism (AML/CFT) regime and restrict possible misuse of Brokerage Industries in order to accelerate the level of outreach of the Securities Brokers for achieving the objective of financial inclusion and strengthening the controls related to Money Laundering (ML)/ Terrorist Financing (TF) risks.

3.2 SECOND VERSION OF SECP GUIDELINES ON ANTI-MONEY LAUNDERING, COUNTERING FINANCING OF TERRORISM, AND PROLIFERATION FINANCING, 2020

3.2.1 The SECP has revised its Guidelines in line with amendments incorporated in SECP AML/CFT Regulations and review of the latest National Risk Assessment of Pakistan in 2019 (“**NRA 2019**”).

- (a) According to NRA 2019, RP should have policies and procedures to prevent the misuse of technological development in ML/TF scheme, and to avoid or mitigate all technologies that favor anonymity. NRA 2019 suggested limitations on the use of non-face to face business, or on virtual business to avoid opening up of alternative possibilities for ML/TF and fraud, especially High-Risk industries such as Brokerage.
- (b) NRA 2019 has determined the risk of corruption and therefore the risk of providing financial services to Politically Exposed Persons (“PEPs”) is high. As per NRA 2019, all domestic PEPs must be scrutinized, particularly for their source of funds wealth and assets.
- (c) Both by international standards and in Pakistan’s National Risk Assessment, Non Profit Organizations (“NPOs”) are classified as a High Risk Sector for TF.
- (d) RPs may conduct Simplified Due Diligence (SDD) in case of lower risks identified by them in line with NRA 2019. RP should pay particular attention to the level of risk assigned to the relevant sector, type of Customer or activity as mentioned in NRA 2019.
- (e) RP must also consider guidance material to determine the level of risk involved in relation to Customers, Products/Services, Delivery Channels and Countries/Region provide in NRA 2019.
- (f) For low risk environment, RP may asses risk by only considering the Likelihood of ML/TF/PF activity involving its identification combined with business experience, and guidance available through SECP, NRA 2019, and FATF.

- (g) RP should have appropriate policies, procedures and controls that enable them to manage and mitigate effectively the inherent risks that they may identified, including risk identified in NRA 2019.
- 3.2.2 The above stated Regulations/framework should be emphasized in the Broker's AML/CFT Policy, Procedures and Controls for meticulous compliance as the Securities Broker maintains zero tolerance for regulatory non-compliances.
- 3.3 SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN (ANTI MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM) REGULATIONS, 2020 REVAMPING EARLIER SECP (AML/CFT) REGULATIONS, 2018**
- 3.3.1 In additions to regulatory requirements applicable on the Regulated Persons of the Securities and Exchange Commission under the SECP (Anti Money Laundering and Countering Financing of Terrorism) Regulations 2018, the following new regulatory requirements have been added under the SECP (AML & CFT) Regulations, 2020 promulgated on September 28, 2020:
- (a) Few definitions have been amended in line with Anti-Money Laundering Act, 2010 updated till 2020 and few definitions have been omitted and some have been added in the new version of SECP (AML/CFT) Regulations, 2020.
 - (b) Suspicious Transactions Reporting and Currency Transactions have been aligned with their requirements under Anti Money Laundering Act, 2010.
 - (c) These AML/CFT Regulations further elaborated the obligation of the Securities Broker to develop mechanisms, processes and procedures for screening and monitoring customers, potential customers and their beneficial owners/associates to detect any matches or potential matches with the stated designated / proscribed persons/entities in the SRO and notified by MoFA, NACTA and MoI;
 - (d) Targeted Financial Sanctions (TFS) Obligations for a Securities Broker to deal with funds and assets without delay including blocking of transactions, without prior notice; and
 - (e) Procedure for prohibiting from making any funds or other assets and rejecting the transactions or attempted transactions or the customer, if relationship has not commenced.
- 3.3.2 In order to taking revised SECP (AML/CFT) Regulations 2020 into effect, the Securities Broker is required to revised its AML/CFT Policy, Procedures and Controls to mitigate the ML/TF/PF risk which may be triggered by establishing business relationship with the customers or potential customers.

4 AML/CFT POLICIES, PROCEDURES AND CONTROLS OF REGULATED PERSON INCLUDING SECURITIES BROKER

- 4.1 The Securities Broker under the Compliance Program prescribed under the SECP AML/CFT Regulations to develop and implement following internal Policies, Procedures and Controls which are approved by its Board of Directors to enable such RPs to effectively manage and mitigate the risk that are identified in the risk assessment of ML/TF/PF or notified by the Commission.

- 4.2 The Broker's AML/CFT Policies, Procedures and Controls provide the mechanism to the Broker to detect and control ML and TF for preventing the abuse of their financial products and services.
- 4.3 The SECP Guidelines supplement the AML/CFT Regulations by clarifying and explaining the general requirement of the regulatory framework to help the Broker in applying national AML/CFT measures. The Broker's AML/CFT Policies, Procedures and Controls define the mechanism for ensuring effective compliance culture for AML/CFT Framework at Broker's end.

5 SCOPE

This policy applies to each and every business segment and all employees of <<Broker>> to effectively mitigate the risks of ML / TF / PF. As the Broker is prone to the risk of being misused by criminal elements for their ulterior motives, this policy will be a guiding document for employees to address the risks stemming from Customers or Transactions in an effective way of using Risk Based Approach ("RBA").

The management will continuously refine its Customer Due Diligence processes using the RBA, through implementation of system based Risk Rating environment for Customer Risk Profiling. Standard Operating Procedures (SOPs) along with various guidance documents and systems are provided to the branches / field staff from time to time to ensure effective execution of the process to identify & mitigate ML / TF / PF risks.

Considering the huge size of undocumented sector in the economy, execution of due diligence process is complex and time consuming. However, for the compliance of regulatory requirements and to contain the customer related risks, the management will make best efforts to conduct proper due diligence of every existing and prospective Customer.

Moreover, the management will handle Terrorism Financing ("TF") as separate risk and will regularly conduct TF risk assessment to identify threats posed by TF and to gauge efficacy of the controls to mitigate the inherent risk in such activities in line with the Pakistan National Risk Assessment on ML/TF 2019 ("NRA 2019") update. Accordingly, existing controls shall be regularly evaluated in the light of prevailing and emerging risks and additional appropriate actions/controls to identify, assess and mitigate the risks; will be implemented.

6 OBJECTIVES

6.1 RISK MANAGEMENT FACTORS:

- (a) To prevent criminal elements from using the Brokerage House for money laundering activities from any of its branch or channel.
- (b) To safeguard the Brokerage House from being used as a conduit in Terrorism and Proliferation Financing.
- (c) Ensuring that only bona fide and legitimate customers are accepted.

6.2 RISK MITIGATION MEASURES:

- (a) To verifying the identity of customers using reliable and independent sources.
- (b) To ensure that proscribed individuals or entities and their affiliates or associates are not having any

trading relationship or being provided any service from the Securities Broker.

- (c) To conduct Ongoing Monitoring of Customer's accounts and transactions to prevent or / and detect potential ML / TF/PF activities.
- (d) To implement Customer Due Diligence process using Risk Based Approach.
- (e) To ensure implementation of Targeted Financial Sanctions (TFS) related to Terrorism & Proliferation Financing (TF & PF).
- (f) To manage reputational, operational, legal and concentration risks etc.
- (g) To put in place appropriate controls for prevention, detection and reporting of Suspicious Activities in accordance with applicable laws/laid down procedures.
- (h) To comply with the applicable laws, regulatory requirements and guidelines etc.

7 ESTABLISHMENT OF DEPARTMENTS/FUNCTIONS AND APPOINTMENT/DESIGNATION OF OFFICERS

7.1 ESTABLISHMENT OF COMPLIANCE DEPARTMENT/FUNCTIONS AND APPOINTMENT OF COMPLIANCE OFFICER

- (a) As required under regulation 29 of the Securities Brokers (Licensing and Operations) Regulations, 2016 (the "**Broker Regulations**"), the Securities Broker shall, as applicable, either designate or appoint a whole-time Compliance Officer, fulfilling the Fit and Proper criteria specified in the Regulations.
- (b) The Compliance Officer should be a Senior Management level officer as defined under the Regulation 2(1)(f) of the AML/CFT Regulations and the Regulation 2(1) of the Brokers Regulations.
- (c) The Compliance Officer shall report directly to the board of directors or chief executive officer or committee.
- (d) The Compliance Officer as well as any other person appointed to assist him shall have timely access to all Customer record and other relevant information, which they may require to discharge their function.
- (e) The Compliance Officer shall have Job Descriptions / Responsibilities included but limited to the responsibilities described under the Brokers Regulations and Regulation 27(2)(c) of the AML/CFT Regulations as per Job Description annexed as **Appendix-A** to this document.
- (f) The function of Compliance Officer cannot be outsourced, only limited functions such as screening or database checks can be performed by another entity, except where the third party is part of a group and is properly supervised by a competent authority.
- (g) Qualification and experience of Compliance Officer shall preferably be in accordance with the Fit and Proper Criteria prescribed under the Brokers Regulations.

7.2 ESTABLISHMENT OF INDEPENDENT INTERNAL AUDIT DEPARTMENT/FUNCTIONS AND APPOINTMENT OF INTERNAL AUDITOR OFFICER/AUDIT OFFICER

- (a) The Securities Broker shall put in place effective and operationally independent Internal Audit function/department having appropriate trained and competent staff.
- (b) The Internal Auditor/Internal Audit function shall directly report to the Board of Directors or its Audit Committee as prescribed under the Brokers Regulations.
- (c) The Internal Audit function shall be headed by a dedicated or designated head of Internal Audit possessing relevant qualification and experience.
- (d) The Audit Committee, if established by the Board shall be responsible to monitor and review the effectiveness of Internal Audit function/department.
- (e) Internal Audit Function can be outsourced to third party through the policies and procedures in relation to outsourcing.
- (f) The Securities Broker shall conduct Due Diligence of Outsourcing Service Provider (OSP) as Fit and Proper to perform the audit activity that is being outsourced.
- (g) The Securities Broker shall have written Outsourcing Agreement clearly sets out the obligations of both parties.
- (h) The Securities Broker shall develop a contingency plan and strategy to exit the arrangement in the event that OSP fails to perform the outsourcing activity as agreed.
- (i) The Securities Broker shall be ultimate responsible for meeting AML/CFT requirements.
- (j) Internal Audit Officer shall have Job Descriptions / Responsibilities included but limited to the responsibilities described under the Brokers Regulations and the AML/CFT Regulations as **per Appendix-B** attached to this document

8 RISK ASSESSMENT AND MITIGATION

8.1 RISK ASSESSMENT:

The Securities Broker must assess each Customer's risk to allow for correct application of Enhanced Due Diligence, Standard, Simplified or Special measures for PEPs and other designated categories as per the Regulations.

Necessary minimum customer risk rating categories are:

- (a) High Risk Category
- (b) Medium Risk Category
- (c) Low Risk Category
- (d) PEP (Special High Risk Category as per NRA 2019)

8.2 RISK MITIGATION MEASURES THROUGH CUSTOMER DUE DILIGENCE (CDD)

The following are the measures to mitigate the risks associated to Money Laundering (ML), Terrorist Financing (TF) and Proliferation Financing (PF) activities through the customers or potential customers:

(a) CUSTOMER IDENTIFICATION

Enrichers Securities (Pvt) Limited will serve only the genuine person(s) and all-out efforts would be made by the management to determine true identity of its customers. Minimum set of documents shall be obtained from various types of customer(s), at the time of opening account, as prescribed in Annexure-I to the SECP AML/CFT Regulations.

The Customer relationship is only established on the strength of:

- (a) In case of Natural Person, valid CNIC / SNIC / Passport / NICOP / SNICOP/ POC / ARC / POR /Form B / Juvenile Card number;
- (b) Where the customer is not a Natural Person, the registration/ incorporation number, business registration number or special resolution/authority;
- (c) In case of government accounts/autonomous entities (as applicable).
- (d) For **non-face-to-face** customers, the management shall put in place suitable operational procedures to mitigate the risk(s) attached with non-face-to-face prospective customer(s) and establish identity of the client.

Moreover, the management shall not rely on third parties to perform any CDD measures as prescribed by the SECP.

(b) CUSTOMER VERIFICATION

The management of shall identify the Beneficial Ownership of accounts/ transactions by taking all reasonable measures. Identity (ies) of the customers and Beneficial Owner will be verified using reliable independent sources including NADRA Verisys or Biometric Verification. Verification of the identity of the customers and Beneficial Owners shall be completed before business relations are established.

Extra care is essential where the customer is acting on behalf of another person, and reasonable steps must be taken to obtain sufficient identification data to verify the identity of that other person as well. For customers that are Legal Persons or for Legal Arrangements, branches shall take reasonable measures to: -

- (a) Understand the ownership and control structure of the customer;
- (b) Determine and verify the natural persons who ultimately own or control the customer. This includes those persons who exercise ultimate effective control over a Legal Person or Arrangement.
- (c) Identity documents, wherever required as per updated AML/CFT Regulations, shall be invariably verified by utilizing on-line facility of Bio Metric Verification and / or NADRA VERISYS and Verification of the identity of the customers and Beneficial Owners shall be completed before business relationship is established or a transaction is processed.

(c) CUSTOMER ACCEPTANCE

The Customer will only be accepted once above given formalities have been completed in letter and spirit. Following accounts shall not be opened/maintained by the Broker where;

- (a) Identity, beneficial ownership, or information on purpose and intended nature of business relationship is not clear.
- (b) Name of the individual customer/organization (including such individuals who are authorized to operate account(s) and the members of governing body/directors/trustees of an entity) appears in the Proscribed/Sanctioned / Specially Designated Nationals (SDNs) entities lists.
- (c) Proscribed entities and persons or those who are known to be associated with such entities and persons, whether under the proscribed name or with a different name.
- (d) Anonymous / fictitious (Benami) or numbered accounts.

(d) CDD FOR WALK-IN-CUSTOMERS:

The detail procedures attached as Annexure E

- (e) Walk-in-customers shall only be entertained, once due diligence measures for transactions relating to such customers as prescribed by the applicable SECP AML/CFT Regulations/guidelines along with international best practices have been complied with.
- (f) For walk-in-customers / occasional customers, to establish and validate the true identity of the person(s) executing the transactions either for self or if the person is acting on behalf of some other person(s), complete originator information must be obtained and identities must be invariably verified as directed under the regulations; using reliable, independent source of information, i.e., Biometric Verification or NADRA Verisys in line with SECP directive on use of Biometric Technology.
- (g) Further, name clearance should also be obtained against sanctioned lists through Central Database (as per **Appendix–D**) for Sanction Screening for walk in customer executing the transaction to ensure that the person is not a proscribed person/entity.

(e) CDD FOR EXISTING CUSTOMERS:

8.2.e.1 Enrichers Securities (Pvt) Limited shall apply CDD requirements to its existing customers on the basis of materiality and risk and shall conduct due diligence on existing relationship at appropriate time taking into account the following:

- (a) Whether and when CDD measure have previously been undertaken; and
- (b) Adequacy of data obtained.

8.2.e.2 The customers who opened accounts with old NICs, the Securities Broker shall ensure the following:

- (a) Attested copies of identity documents shall be presented in its record;

- (b) Without identity documents accounts shall be blocked after serving one (1) month prior notice for all withdrawals until all subject regulatory requirements are fulfilled;
- (c) Upon submission of attested copy of identity document and verification of the same from NADRA Verisys or Biometric Verification, the blockage shall be removed.

8.2.e.3 The Customers whose accounts are dormant or in-operative, withdrawal shall be not be allowed until the account is activated on the request of the Customer on following basis:

- (a) NADRA Verisys or Biometric Verification has been done; and
- (b) Attested copy of customer's valid identity document.

(f) TARGETED FINANCIAL SANCTIONS (TFS) MANAGEMENT

In order to comply with the Targeted Financial Sanctions regime, the management will devise effective system and controls to safe guard the bank from being exploited by the terrorists for TF/PF. In this regard, all the relationships (customers/non-customers i.e. walk in customers, shareholders, directors, third party service providers/vendors) will be screened against the prescribed sanctions lists; both local and international before establishment of the relationship. Further, all the relationships will be screened against the sanctioned lists on periodic basis as well.

(g) ACCOUNTS AND TRANSACTIONS MONITORING:

The Operations Department shall update expected monthly credit turnover limits in the system and/ or revise CDD profile of customer(s) as per guidelines for ongoing review as required under applicable SECP AML CFT Regulations/guidelines along with international best practices, while, the basis of revision shall be documented and customers may be consulted, if necessary.

Such limits will be maintained to make sure that all transactions are consistent with the Broker's knowledge of the customer, its business and risk profile and are conducted in accordance with the SECP AML / CFT regulations for the Securities Broker, instructions of Financial Monitoring Unit (FMU) and other applicable local /international bodies.

Financial transactions should be monitored through automated Transaction Monitoring System (TMS) based on predefined scenarios and thresholds.

The management shall pay special attention to every complex, unusually large and out- of-pattern transaction(s), which have no apparent economic or visible lawful purpose. If the Broker suspects or has reasonable grounds to suspect that the funds are the proceeds of criminal activities or have potential to be used for terrorist activities, it shall report its suspicion to Financial Monitoring Unit (FMU) through its GoAML E-portal.

In case of suspicion, the Compliance Officer shall raise Suspicious Transaction Reports in line with the requirement highlighted under AML Act 2010, SECP AML / CFT regulations and SECP Guidelines. Accordingly, the Compliance Officer should devise procedures to meet these requirements.

For customers / clients whose accounts are dormant, the Broker shall not allow debit entries in such accounts (except those allowed under AML/CFT Regulations) until the account holder(s) produce(s) attested copy of

his/her CNIC if already not available in the Broker's record, fulfill all other requirements for activation of the account and the Operation Department is satisfied with CDD of the customer.

The employees of the Broker are strictly prohibited to disclose the fact to the customer that a Suspicious Transaction Report (STR) / Currency Transaction Report (CTR) or related information has been reported to FMU or any other Law Enforcement Agency (LEA).

Currency Transactions (i.e. CTR) exceeding the prescribed limits as defined in AML Act 2010 and its subsequent amendments from time to time will be reported to FMU through GoAML E-portal.

In order to adopt additional measures to further strengthen the CDD regime, CDD/EDD Assessment up to Top 50 Investors will be conducted by each branch. The branches shall conduct assessment of such accounts regarding compliance of the CDD/EDD requirements and identify deficiencies and make necessary efforts to regularize the deficiencies identified during the assessment process.

9 ON-GOING MONITORING OF BUSINESS RELATIONSHIPS

- 9.1 In case a customer has no active business with the RP, and cannot be reached, or refuses to engage in updating because there is no active business, account should be marked inactive with the instruction that relationship cannot be re-activated without full CDD.
- 9.2 In case due diligence cannot be updated, a formal ending of the relationship should be done by following the legal process for ending a customer relationship under the applicable laws.
- 9.3 RPs are encouraged to invest in computer systems for transactions monitoring specifically designed to assist the detection of ML/TF/PF. It is recognized that this may not be necessary in a risk-based approach. In such circumstances, RPs will need to ensure they have alternative systems in place for conducting on-going monitoring.
- 9.4 Alternate or manual systems of ongoing monitoring may rely on Compliance Officer generated lists or instructions and regular lists generated from IT system such as:
 - (a) High transaction list for each day;
 - (b) Periodic list of transactions over determined thresholds;
 - (c) Periodic list of new clients and relations closings;
 - (d) Monthly or yearly lists of inactive clients; Ad Hoc reviews, meaning reviews triggered by an event, new information from supervisors and media reports.

10 SIMPLIFIED DUE DILIGENCE ("SDD") MEASURES:

The detail procedures attached as **Annexure F**

- 10.1 The Securities Broker may conduct SDD in case of Low Risk identified in line with NRA 2019. The Securities Broker should pay attention to the level of Risk assigned in the latest NRA 2019:
 - (a) to relevant sector;
 - (b) to relevant customer type; and
 - (c) to activity

10.2 The Securities Broker will use the following SDD Measures:

- (a) Reducing the frequency of Customer identification update;
- (b) Reducing the degree of On-going monitoring and scrutinizing transactions, based on reasonable monetary threshold;
- (c) not collecting specific information or carrying out specific measures to understand the purpose and intended nature of the business relationship, but inferring the purpose and nature from the type of transaction or business relationship established;
- (d) undertaking verification after establishment of the business relationship;
- (e) less stringent steps to verify the Beneficial Owner.

10.3 Where the Securities Broker decides to take SDD measures w.r.t a Customer, it should document the **full rationale behind such decision** and make available that documentation to the Commission on request.

11 ENHANCED DUE DILIGENCE MEASURES:

The detail procedures attached as **Annexure G**

The Securities Broker shall apply Enhanced Due Diligence Measures in the following scenarios:

11.1 POLITICALLY EXPOSES PERSONS (PEPS)

- (a) Business relationships with PEPs holding important public positions may expose RP to significant reputational and/or legal risk. In addition, PEPs because of their position, may expose RPs and their business partners to a high degree of public expectation and scrutiny.
- (b) Family members of a PEP are individuals who are related to a PEP either directly or through marriage. Close associates are individuals who are closely connected to PEP, either socially or professionally. Close associates have in many cases been used to provide a cover for the financial activities of a PEP, and may not be in any way connected to the PEP in an official capacity. The CDD done by RPs on the source of funds or source of wealth of a customer may be the first clear documentation of a close association.

11.2 RISK AS PER NRA 2019:

- (a) The AML/CFT National Risk Assessment of Pakistan has determined the risk of corruption and therefore the risk of providing financial services to PEPs is high. This means that all domestic PEPs must be scrutinized, particularly for their source of funds wealth and assets.
- (b) The Securities Broker shall be obliged to ascertain whether their customer is a PEP. In assessing the ML/TF risks of a PEP, the Securities Broker shall consider factors such as whether the customer who is a PEP:
 - a. Has prominent public functions in sectors known to be exposed to corruption;

- b. Has business interests that can cause conflict of interests (with the position held);
 - c. Has been mentioned in media related to illicit financial behavior; and
 - d. Is from a high risk country.
- (c) The PEP red flags that the RPs shall consider include:
- a. The information that is provided by the PEP is inconsistent with other (publicly available) information, such as asset declarations and published official salaries;
 - b. A family member of a PEP without own financial means is transacting with the RP without declaring the relationship to a PEP, or the origin of the funds transacted;
 - c. The PEP is associated with, or owns, or signs for, complex legal structures that are commonly used to hide Beneficial Ownership;
 - d. Funds are repeatedly moved to and from countries to which the PEP does not seem to have ties;
 - e. A PEP uses multiple bank accounts for no apparent commercial or other reason;
 - f. The PEP is from a country that prohibits or restricts certain citizens from holding accounts or owning certain property in a foreign country.
- (d) The Securities Broker shall take a Risk-Based Approach in determining whether to continue to consider a customer as a PEP who is no longer a PEP. The factors that RPs should consider include:
- a. the level of (informal) influence that the individual could still exercise; and
 - b. whether the individual's previous and current function are linked in any way (e.g., formally by appointment of the PEPs successor, or informally by the fact that the PEP continues to deal with the same substantive matters, or through continued strong ties within a party, family or institution).
- (e) The Securities Broker in addition to performing normal due diligence measures should also:
- a. have appropriate risk management systems to determine whether the customer is a PEP;
 - b. obtain **senior management approval** for establishing business relationships;
 - c. take reasonable measures to establish the source of wealth and source of funds; and
 - d. conduct enhanced ongoing monitoring of the business relationship.

11.3 CUSTOMERS FROM HIGH-RISK JURISDICTIONS IDENTIFIED BY FATF:

The management shall also apply Enhance Due Diligence (EDD), proportionate to the risks to business relationships with individuals and entities including Financial Institutions from high-risk foreign jurisdictions as specified by the FATF and as identified by the Securities Broker during its internal TF risk assessment.

11.4 NON-PROFIT ORGANIZATIONS (“NPOs”) OR NON-GOVERNMENT ORGANIZATIONS (“NGOs”)

- (a) Both by international standards and in Pakistan’s National Risk Assessment, NPOs and NGOs are classified as a High-Risk Sector for TF.
- (b) The objective of Enhanced Customer Due Diligence for NPOs/NGOs is to ensure that NPOs/NGOs are not misused by terrorist organizations:
 - a. to pose as legitimate entities;
 - b. to exploit legitimate entities as conduits for terrorist financing, including for the purpose of escaping asset freezing measures; or
 - c. to conceal or obscure the clandestine diversion of funds intended for legitimate purposes, but diverted for terrorist purposes.
- (c) The Securities Broker who transacts with NPOs/NGOs should understand:
 - a. Beneficiaries and Beneficial Owners including certain donors that maintain decision rights;
 - b. Flow of funds, in particular the use of funds by an NPO/NGO.

11.5 HIGH NET WORTH INDIVIDUALS (HNWI)

- 11.5.1 High net worth individuals while an attractive customer for the Securities Broker can expose the RP to higher risk of financial transactions that may be illicit. There is no standard size of HNWI. Every RP knows to whom it is offering its products and services, and can establish criterion for HNWI applicable to their particular business.
- 11.5.2 The Securities Broker should scrutinize HNWI customers to determine, whether they carry a higher risk of ML/FT and require additional due diligence measures. Such scrutiny must be documented and updated as part of the Risk Assessment of the RP.

11.6 HIGH-RISK COUNTRIES & HIGHER RISK REGIONS WITHIN A COUNTRY

- 11.6.1 Certain countries, or regions within countries have a specific higher AML/CFT risk profile. Examples are border regions, large goods transit points such as ports, or regions experiencing social unrest, that can be associated with specific crime patterns such as cash or people smuggling, drug trafficking, violent crimes, fraud and corruption, and consequently pose a higher potential risk to the RP. Conducting a business relationship with a customer from such a country/region exposes the RP to risk of channeling illicit money flows.
- 11.6.2 The Securities Broker should exercise additional caution, and conduct EDD on individuals and/or entities based in high-risk countries / regions. The Securities Broker shall consult publicly available information to ensure that they are aware of the high-risk countries/territories. The Securities Broker shall consider among the other sources, sanctions issued by the UN, the FATF high risk and non-cooperative jurisdictions, the FATF and its regional style bodies (FSRBs) and Transparency International Corruption Perception Index (TI CPI).
- 11.6.3 Complex legal structures may be created in jurisdictions specializing in obscuring the trail to **Beneficial Owners** and allowing easy creation of complex corporate vehicles, so called offshore jurisdictions. RPs engaging with foreign complex legal structures, or with local companies owned by such foreign legal structures, need to educate

themselves on offshore financial centers and acquire adequate expertise to understand their customers' ownership structure up to the Beneficial Owner and be able to assess documents presented to them.

11.6.4 AFGHAN REFUGEES

Identification and evaluation of the customers or their nominees or authorized persons or directors or sponsors or major shareholders, who are Afghan National or Afghan Refugees.

Enrichers Securities (Pvt) Limited shall ensure that before establishing business relationship with people from High Risk jurisdiction areas as identified in AML / CFT regulations, the person is not an Afghan Refugee or a person's nominee or joint holder is not an Afghan Refugee. It is likely hood that Afghan Refugees are involved in various crimes like drug trafficking, kidnapping, money laundering and terrorist activities.

12 RISK MANAGEMENT APPLYING RISK BASED APPROACH:

- 12.1 All relationships shall be categorized with respect to their risk levels i.e., High, Medium and Low based on the risk profiling of customer (through e-KYC/CDD application and as guided in SECP AML CFT Regulations and SECP Guidelines and international best practices for making effective decision whether to perform Customer Due Diligence (CDD) or Enhanced Due Diligence (EDD) both at the time of opening and ongoing monitoring of business relationship.
- 12.2 The Broker may endeavor to develop the system based KYC/CDD and Risk Profiling of Customer, through implementation of e-KYC/CDD Application. This application may assist the branches for effective and efficient KYC/CDD management in order to mitigate risk related to Money Laundering/Financing of Terrorism and Proliferation Financing.
- 12.3 The approval for opening of Politically Exposed Person (PEP) and Non-Governmental Organizations (NGOs)/Not-for-Profit Organizations (NPOs) and Charities account will be obtained from Senior Management (Not less than Head of Operations or Business Development) after performing EDD. Further Personal accounts will not be allowed to be used for charity purposes/collection of donations.
- 12.4 Customer KYC / CDD profile will be reviewed and/or updated on the basis of below mentioned predefined frequency, in accordance with the risk profile of the customer:

High Risk	At least Once in a Year or on need basis*
Medium Risk	At Least Once in 2 Years or on need basis*
Low Risk	At least Once in 3 Years or on need basis*

**In case of any material change in the relationship or deviation from customer profile, CDD will be conducted and customer profile will be updated immediately without lapse of above defined period.*

- 12.5 The Compliance Officer will counter-examine the relationships to ensure that due diligence procedures are adhered to in letter and spirit by the concerned staff in business segments.
- 12.6 While formulating procedures and controls, the management shall take into consideration Money Laundering and Financing of Terrorism threats that may arise from the use of new or developing technologies, especially those having features of anonymity or inconsistency with the spirit of CDD/EDD measures.

13 IDENTIFICATION OF BENEFICIAL OWNERSHIP OF LEGAL PERSONS OR LEGAL ARRANGEMENT

The Securities Broker shall identify the beneficial owners of Legal Person or Legal Arrangements as per following procedures:

13.1 The Beneficial Owner (**the “BO”**) is the natural person at the end of the chain who ultimately owns or controls the customer. The BO is defined under AML/CFT Regulations, “beneficial *owner*” *in relation to a customer of a regulated person means, the natural person who ultimately owns or control a customer or the natural person on whose behalf a transaction is being conducted and includes the person who exercise ultimate effective control over a person or a legal arrangement”.*

13.2 **The Companies Act, 2017 defines “Beneficial Ownership of shareholders or officer of a company”** means ownership of securities beneficially owned, held or **controlled** by any officer or **substantial shareholder** directly or indirectly, either by-

- (a) him or her;
- (b) the wife or husband of an officer of a company, not being herself or himself an officer of the company;
- (c) the minor son or daughter of an officer where “son” includes step-son and “daughter” includes step-daughter; and “minor” means a person under the age of eighteen years;
- (d) in case of a company, where such officer or **substantial shareholder** is a shareholder, but to the extent of his proportionate shareholding in the company:

Provided that “**control**” in relation to securities means the power to exercise a controlling influence over the voting power attached thereto:

Provided further that in case **the substantial shareholder** is a non-natural person, only those securities will be treated beneficially owned by it, which are held in its name.

Explanation: - For the purpose of this Act “**substantial shareholder**”, in relation to a company, means a person who has an interest in shares of a company-

- (a) the nominal value of which is equal to or more than ten per cent (10%) of the issued share capital of the company; or
 - (b) which enables the person to exercise or control the exercise of ten (10%) per cent or more of the voting power at a general meeting of the company.
- (a) **Backward Ownerships** means, “Ownership of the Legal Person or Legal Arrangement by another Legal Person or Legal Arrangement, that is also owned by another Legal Person or Legal Arrangement and so on and so forth until ultimate Natural Person(s) is(are) identified. For Example:
- (b)

ULTIMATE NATURAL PERSON	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	LEGLA PERSON (CUSTOMER)
Mr. Ahmad	50%	ABC Company (Pvt.) Limited	10%	XYZ Company	10%	Technologies (Pvt.) Limited
Mr. Ali	25%		20%	MNP Limited	20%	
Mr. Sam	25%		NATURAL PERSONS (Mr. Rizwan-50% & MRS. Rizwan-30%)		70%	

- (c) **Forward Ownerships** means” the Legal Person or Legal Arrangement which owns another Legal Person or Legal Arrangement, that also owns another Legal Person or Legal Arrangement, until ultimate Natural Person(s) is(are) found, who owns such Legal Person or Legal Arrangement.

LEGLA PERSON (CUSTOMER)	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	ULTIMATE NATURAL PERSON)
Investments Limited	50%	ABC Company (Pvt.) Limited	10%	XYZ Company	90%	Mr. Ahmad
					10%	Mr. Ali
			90%	NATURAL PERSON		Mr. Abdullah
	25%	TRUST	20%	MNP Limited	50%	Mr. Ali
					30%	Mr. Zaman
					20%	Mr. Sam
25%	NATURAL PERSON				Mr. Bakar	

- (d) In this Customer (Legal Person) and its ultimate Beneficial Owners i.e., Natural Persons will be screened for identification and assessment against the lists of Designated/Proscribed Persons/Entities by NACTA and UNSCR through Govt. of Pakistan. The lists of designated / proscribed persons/entities are available on the following links:

- d. <https://www.un.org/securitycouncil/content/un-sc-consolidated-list>
- e. [\(https://scsanctions.un.org/search/](https://scsanctions.un.org/search/)
- f. <https://www.un.org/securitycouncil/sanctions/1267>
- g. <https://www.un.org/securitycouncil/sanctions/1988>
- h. <https://www.un.org/securitycouncil/sanctions/1718>
- i. <https://www.un.org/securitycouncil/content/2231/background>
- j. <https://nacta.gov.pk/proscribed-organizations-3/>
- k. <https://nacta.gov.pk/pp/>
- l. <https://nfs.punjab.gov.pk/>

13.3 FOR LEGAL PERSONS / LEGAL ARRANGEMENTS:

The Securities Broker will essentially be required to understand the ownership and control structure of the Customer having simple structure based on the following:

- (a) Plausibility and records.
- (b) Further verification in any case of lack of transparency or doubt, or higher risk.
- (c) Register of Ultimate Beneficial Ownership as primary source for verification.

In case of a local Customer having complex structures, foreign entities or foreign owned entities, Securities Broker is required to develop and have the necessary knowledge to correctly identify and verify such clients and their beneficial owners using information and data publicly available on the internet.

- (a) The Securities Broker may adopt a Risk-Based Approach to the verification of beneficial ownership of a customer.
- (b) Securities Broker must identify the beneficial ownership of a customer, regardless of the level of risk associated with that customer. However, the Securities Broker shall take reasonable steps to verify the identity and information depends upon on the risk assessment of the customer.
- (c) The Securities Broker should assess different levels of ML/TF risks posed by their customers' beneficial owners.

13.4 CUSTOMERS, WHOSE BENEFICIAL OWNERSHIP MUST BE KNOW:

The Securities Brokers must identify the BOs of the following Customers:

- (a) Politically Exposed Persons;
- (b) Customers having links with High-Risk Country or Region.
- (c) Students not having regular and known Source of Income;
- (d) House-wives not having regular and know Source of Income.
- (e) Trusts, Non-Profit Organizations, Non-Government Organizations, etc.
- (f) Companies, Corporations and Partnerships having backward and/or forward ownership by another legal person(s).

13.5 IN CASE OF SUSPICION REGARDING BO OF THE CUSTOMER:

If the Securities Broker has doubts about the veracity or adequacy of the information provided, it should do the following actions:

- (a) not start a business relationship, or provide a financial service;
- (b) consider making a suspicious transaction report to FMU;
- (c) In case of non-reporting of STR, the Securities Broker may continue business relationship with such Customer provided rationale for its decision is recorded on its EDD form.

13.6 BENEFICIAL OWNERSHIP DECLARATION FORM:

The Securities Broker shall gather information relating to Beneficial Ownership from the Customer, who are Legal Person or Legal Arrangement as per declaration given by the Customer on **Appendix-C**.

14 REVIEW OF NEW PRODUCTS, PRACTICES AND SERVICES INCLUDING NEW TECHNOLOGIES

The management shall identify and assess the ML/FT/PF risks that may arise in relation to expansion of operations in different jurisdictions, the development of new products, services, business practices including delivery mechanism and the use of new or developing technologies for both new and pre-existing products.

14.1 CROSS BORDER FUNDS TRANSFER

Enrichers Securities (Pvt) Limited shall strictly monitor wire transfers (domestic / cross border) regardless of any threshold.

Foreign wire transfers are usually used to hid the actual transactions occurred. <<Securities Broker>> shall ensures that if any amount is received from cross border, the amount is actually transferred from the client through legal process of funds transfer methods in foreign countries like **SWIFT** not through various financial institutions to layer the transactions.

15 RECORD KEEPING

The records of identification documents, account opening forms, KYC forms, verification documents and other relevant documents along with records of account files and business correspondence, shall be maintained for a minimum period of ten years after the business relationship is ended.

The management shall also maintain for a minimum period of ten years all necessary records on transactions for both domestic and cross-border from the date of completion of transaction(s). The data relating to Suspicious Transactions and Currency Transactions reported by the Broker to FMU will be retained for the period of at least ten years from the date of such reporting.

However, records relating to customers, accounts or transactions will be retained for longer period, which involve litigation or is required by court or other competent authority until otherwise instructed by the relevant body. Furthermore, all signature cards and documents indicating signing authorities, and other documents relating to the account or instrument surrendered to SECP / Exchange / any other competent law enforcing agency (duly authorized by law/court), shall be kept in the Broker's record till such time that SECP / Exchange / competent law enforcing agency (duly authorized by law/court) informs in writing that same need no longer to be preserved.

16 CORRESPONDENT BROKERAGE SERVICE BUSINESSES

The management will establish correspondent brokerage relationships with only those foreign brokers that have adequate and effective AML / CFT systems and policies in line with the AML / CFT regulations relating to the country in which foreign broker operate. The Broker will pay special attention when establishing or continuing correspondent relationship with foreign brokers which are located in geographical locations or governed by jurisdictions that have been identified by FATF for inadequate and poor AML/CFT standards in the fight against money laundering and financing of terrorism.

Before establishing new correspondent brokerage relationship, approval from senior management shall be obtained and proper Due Diligence shall be conducted. Ongoing Due Diligence of respondent/correspondent broker will be conducted using risk-based approach following the *guidelines given in below table*.

High Risk	At least Once in a Year <i>or earlier if any happening / event/situation so demands*</i>
Medium Risk	At Least Once in 2 Years <i>or earlier if any happening / event/situation so demands *</i>
Low Risk	At least Once in 3 Years <i>or earlier if any happening / event/situation so demands *</i>

**In case of any material change in the relationship or deviation from customer profile, CDD will be conducted and customer profile will be updated immediately without lapse of above defined period. Material change in relationship in the context of correspondent foreign broker would mean that the conduct of the account is not commensurate with the stated profile of the correspondent or respondent foreign broker and can also be triggered owing to some geo political situation under sanctions regime.*

The Broker shall not enter into or continue correspondent brokerage relations with a shell broker/entity and shall take appropriate measures when establishing correspondent brokerage relations, to satisfy themselves that their respondent broker does not permit their accounts to be used by shell companies/entities.

17 EMPLOYEES DUE DILIGENCE FOR THEIR VERIFICATION AND SCREENING

In line with SECP AML/CFT regulations, the management will implement employee's due diligence policy for verification and screening of employees so inducted/hired to ensure that person has a clean history. Further, the Compliance Officer shall perform independent review of Employee Due Diligence process as per Broker's HR Manual/Policy.

18 VENDORS, OUTSOURCING AND SERVICE PROVIDER'S DUE DILIGENCE

The management should ensure that regulatory guidelines as specified in SECP AML/CFT Regulations and Guidelines relating to Outsourcing Arrangements for Compliances, Internal Audit and Operations, if done to outsourcing service providers are implemented.

19 TRAINING

Suitable Employee Training Program will be put in place by the management on an annual basis to enhance staff capability, to effectively implement the regulatory requirements, the Broker's own policy & procedural requirements relevant to AML/CFT including alerts analysis, and possible reporting of Suspicious Transactions as well as to understand new developments in ML/TF/PF techniques, methods, and trends. Further, dedicated awareness sessions will be held for the Broker's staff to raise the level of understanding of the Broker's officials on ML/TF/PF risks.

20 COMPLIANCE REVIEW

The Compliance Officer shall perform the periodic review of branches to check their level of compliance with the provisions in the AML/CFT Policy and Procedures according to their scope/framework.

21 POLICY REVIEW PERIOD

The AML / CFT Policy will be reviewed on as and when required basis but not later than one year.

22 GROSSAR

AML/CFT	Anti-Money Laundering and Combating the Financing of Terrorism
ARC	Aliens Registration Card
CCO/CO	Chief Compliance Officer/Compliance Officer
CNIC	Computerized National Identity Card
CTR	Currency Transaction Report
FATF	Financial Action Task Force
FMU	Financial monitoring Unit at SBP
EDD	Enhanced Due Diligence
KYC	Know Your Customer
NICOP	National Identity Card For Overseas Pakistanis
NACTA	National Counter Terrorism Authority
POR	Proof of Registration (For Afghan Nationals)
PEP	Politically Exposed Person
POC	Pakistan Origin Card
RBA	Risk Based Approach
SNIC	Smart National Identity Card
SNICOP	Smart National Identity Card for Overseas Pakistanis
SNIC	Smart National Identity Card
STR	Suspicious Transaction Report
TFS	Targeted Financial Sanctions

COMPLIANCE OFFICER

Job Descriptions

Emp.#	Employee's Name	Qualifications	Experiences	Joining/Appointment Date
Functionally Reporting to:		Administrative Reporting to:		
Board of Director / Risk & Compliance Committee		Chief Executive Officer/Chief Operating Officer		
<p>Under Securities Brokers (Licensing & Operations) Regulations, 2016, the Compliance Officer is responsible:</p> <ul style="list-style-type: none"> For ensuring compliance with and performing functions pertaining to the segregation and safekeeping of customer assets. To immediately report any non-compliance with any requirement to the securities broker for it taking immediate steps to ensure compliance with the regulatory regime. Where the securities broker fails to take steps as reported by the Compliance Officer, to immediately inform the Securities Exchange and the Commission of the non-compliance by the securities broker. To prepare monthly compliance reports for submitting to the board of directors of the securities broker/Risk & Compliance Committee. <p>Under SECP (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2018, the Compliance Officer is responsible for the areas including, but not limited to-</p> <ul style="list-style-type: none"> Effective compliance with the relevant provisions of these Regulations, the AML Act, the Anti-Money Laundering Rules, 2008, the Anti-Money Laundering Regulations, 2015 and other directions and guidelines issued under the aforementioned regulations and laws, as amended from time to time; ensuring that the internal policies, procedures and controls for prevention of ML/TF are approved by the board of directors of the regulated person and are effectively implemented; monitoring, reviewing and updating AML/CFT policies and procedures; providing assistance in compliance to other departments and branches; timely submission of accurate data/ returns as required under the applicable laws; monitoring and timely reporting of Suspicious and Currency Transactions to FMU; such other responsibilities as the Securities Broker may deem necessary in order to ensure compliance with these regulations; and Review and investigate with suspicion, the transactions, which are out of character, inconsistent with the history, pattern, or normal operation of the account or not commensurate with the level of income of a customer and referred to Compliance Officer for possible reporting to FMU under the AML Act. 				
Reviewed by: Chief Executive Officer		Dated: __/__/2020	Approved by: Board of Directors	Dated: __/__/2020

INTERNAL AUDITOR
Job Descriptions

Emp.#	Employee's Name	Qualifications	Experiences	Joining/Appointment Date
Functionally Reporting to:		Administrative Reporting to:		
Audit Committee of the Board		Chief Executive Officer/Chief Operating Officer		
<p>Under Securities Brokers (Licensing & Operations) Regulations, 2016, the Internal Auditor/Function is responsible: -</p> <ul style="list-style-type: none"> To ensure that a periodic or annual review of the internal control system; For assessment of overall level of compliance of the securities broker; For reporting directly to the board of directors or its audit committee; To monitor the integrity of the financial statements of the company; To review the company's internal controls and risk management systems; To make recommendations to the board in relation to appointment or removal of the auditor; To approve the remuneration and terms of engagement of the auditor; To develop and implement policy on engagement of the auditor to supply non-audit services; <p>Under SECP (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2018, the Internal Auditor/Function is responsible for the areas including, but not limited to-</p> <ul style="list-style-type: none"> Test the Anti-Money Laundering (AML) and Countering Financing of Terrorism (CFT) system for implementing counter Money Laundering (ML) and Terrorism Financing (TF) measures having regard to ML and TF Risk and size of the business; Conduct an AML/CFT audit to independently evaluate the effectiveness of compliance with AML/CFT Policies and Procedures; Asses overall governance structure of the Securities Broker for AML/CFT, including the role, duties and responsibilities of the Compliance Officer/function; Asses the ownership taken by management and board of directors (where applicable), in particular Risk Assessment, Risk Based Approach, AML/CFT related internal enquiries, suspicious transaction reports and regulatory compliance; Assess the integrity and effectiveness of the AML/CFT systems and controls and the adequacy of internal policies and procedures in addressing identified risks, including: <ul style="list-style-type: none"> CDD measures including monitoring and updating of customer data; Screening process for TFS, and test its functionality; testing transactions with emphasis on high-risk customers, geographies, products and services; Record keeping and documentation. the effectiveness of parameters for automatic alerts and the adequacy of RP's process of identifying suspicious activity, internal investigations and reporting; the adequacy and effectiveness of training programs and employees' knowledge of the laws, regulations, and policies & procedures. <p>Audit Period: The frequency of the audit shall be quarterly in normal course of business but at any time if need arises.</p>				
Reviewed by: Audit Committee		Dated: __/__/2020	Approved by: Board of Directors	Dated: __/__/2020

Declaration of Beneficial Owner (Individual)

Sub Account #: _____

Trading Account #: _____

Name:	
Father/Husband Name:	
Address:	
Residential Status:	
Nationality:	
CNIC Number	
Mobile/Cell #:	
Telephone #:	
Email:	
Occupation:	
Relationship with Account Holder:	

I, _____ S/o. _____ holder of CNIC _____ hereby certify that _____ is in my relationship and I am supporting him/her to open and maintain Account No. _____ with <<Broker's Name>>.

BENEFICIAL OWNER SIGNATURE

ACCOUNT HOLDER SIGNATURE

- Encl.: 01). Attested Copy of CNIC
02). KYC of Beneficial Owner
03). Copies of Income Tax and Wealth Tax Return and/or Evidence for source of Income and Funds
05). Gift Deed, in case of Student, Housewife or dependent.

COMPLIANCE OFFICER

CHIEF EXECUTIVE OFFICER

DATED: _____

DATABASE OF LEGAL PERSON OR LEGAL ARRANGEMENT AND THEIR ASSOCIATES FOR CHECKING THEM AGAINST THE LIST OF DESIGNATED/PROSCRIBED PERSONS

The Securities Broker is required to build a database having name of the Customers (corporate entities, trusts, NPO, NGO, individuals and authorized persons), such as:

Legal Person / Legal Arrangement having Backward Beneficial Ownerships of Natural Persons:

ULTIMATE PERSON	NATURAL	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	LEGAL PERSON (CUSTOMER)	Board Members	Authorized Signatories
Mr. Ahmad		50%	ABC Company (Pvt.) Limited	10%	XYZ Company	10%	Technologies (Pvt.) Limited	Mr. Zameer, CEO/Director	
Mr. Ali		25%		20%	MNP Limited	20%		Mr. Kabeer,	Mr. Ali COO
Mr. Sam		25%		NATURAL PERSONS (Mr. Rizwan-50% & MRS. Rizwan-30%)		70%		Ms. Aisha, Director/CFO	

Legal Person / Legal Arrangement having Forward Beneficial Ownerships of Natural Persons:

AUTHORIZED PERSONS	BOARD OF DIRECTORS	LEGAL PERSON (CUSTOMER)	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	LEGAL PERSON	BENEFICIAL OWNERSHIP	ULTIMATE NATURAL PERSON)
Mr. A		Investments Limited	50%	ABC Company (Pvt.) Limited	10%	XYZ Company	90%	Mr. Ahmad
Mr. M	Mr. B				90%	NATURAL PERSON		Mr. Abdullah
	Mr. C							
Mr. N	Mr. D		25%	TRUST	20%	MNP Limited	50%	Mr. Ali
	Mr. E					30%	Mr. Zaman	
	Mr. F					20%	Mr. Sam	
	Mr. G		25%	NATURAL PERSON				Mr. Bakar

The Securities Broker will search the database of his Customers which are Legal Persons, Legal Arrangements or Natural Persons whose Beneficial Owners are different on the following scenarios: -

- When a business relationship with a new Customer will be established;
- When the lists of Designated / Proscribed will be updated by NACTA, UNSC and any other Law Enforcement Agencies through SECP;
- When Account of the Customer will be updated regarding its change in its Board of Directors, Trustee, Nominees, Authorized Persons, etc.
- When, any new Employee will be hired.
- Periodically screening of all Customers and their Associates including Board members/Trustees, nominees, Authorized persons as notified by the Commission.

PROCEDURES FOR CUSTOMER DUE DILIGENCE (CDD)

In order to know who its Customers are and it shall not keep anonymous accounts or accounts in fictions names, the Enrichers Securities (Pvt) Limited shall be required to take the following steps to ensure that its customer are who they purport themselves to be:

PROC #	PROCEDURES PERFORMED	YES / NO	REASON, IN CASE “NO”
1	To identify the customers and verify the identity of that customer using reliable and independent documents, data and information obtaining the following: <ul style="list-style-type: none"> • Name; • Copy of CNIC; • Copy of Utility Bill to confirm residential address; • Date of Birth; • Proof of Income/Wealth Statement (Latest); • Any other information, if needed. 		
2	Identify every person who acts on behalf of the customer by verifying the authority of that person to act on behalf of the customer, if any.		
3	Ongoing due diligence on the business relationship and scrutinize transaction undertaken throughout the course of that relationship to ensure that transaction being conducted are consistent with: <ul style="list-style-type: none"> • Knowledge of the Customer; • Business; • Risk Profiles as assessed through evidences; • Veracity or adequacy of the previously obtained customer identification information. 		
4	In case of suspicion of ML/TF/PF Seek to identify and verify the identity of the customer and the beneficial owner(s), irrespective of any specified threshold that might otherwise apply;		
5	Filing of Suspicious Transaction Report (STR) with the FMU, in accordance with the requirement under the law.		
6	Monitor transactions to determine whether they are linked and restructured into two or more transactions of smaller values to circumvent the applicable threshold.		
7	Ensure that they understand the purpose and intended nature of the proposed business relationship or transactions		
8	Verify whether that authorized person is properly authorized to act on		

	behalf of the customer while conducting CDD of the authorized persons(s) using the same standards that are applicable to a customer and ascertaining the reason for such authorization and obtain a copy of the authorization document.		
9	Customers identification procedure and ongoing monitoring standards for Customer not physically present for identification purposes as for those where the client is available for interview.		
10	Where a Customer has not been physically present for identification purposes, practices will generally not be able to determine that the documentary evidence of identity actually relates to the Customers they are dealing with.		

Senior Management’s Approval Note for High Risk Clients

The Customer has been marked as High Risk Customer based on the ANY of the following circumstance:

Sr. #	Circumstance	Applicable (Yes/No), name the category, where required.
1	Customer belonging to country or region which is non-compliant with Anti-Money Laundering according to FATF	
2	Customer is Body corporate, partnership, association or legal arrangement including any of the following: (a) NGO (b) NPO (c) Trust, which receives donations (d) Company having nominee shareholders (e) Business that have Cash-intensive (f) Shell Company, especially in case where there is foreign ownership spreaded across jurisdiction;	
3	Legal Person or Legal Arrangement with complex ownership structure	
4	Politically Exposed Person (PEP) or its associates such as: (a) Family member; (b) Close associates	
5	Customer with Incomplete Documentations	
6	Customer with undisclosed ownership such as (a) House-wife (b) Student (c) Dependents Children (d) Dependent Parents	
7	Customer belonging to Higher Risk Regions within a country as per NRA 2019, which has been exposed to ML/TF risks include any of the following: (a) Border Regions; (b) Large Goods Transit such as ports; (c) Region experiencing social unrest; (d) Associated with specific crime patterns such as cash or people smuggling, drug trafficking, violent crimes, fraud and corruption,	
8	Individual Customer belonging to the following businesses carrying high risks: (a) Non-Resident (b) Requested/Applied Amount of Investment/business does not match the profile/particulars of customer; (c) Designated Non-Financial Business and Professional, such as a. Real Estate Dealer; b. Dealer in Precious metal and stones; c. Accountants d. Lawyer / Notaries	

As the Customer may pose a higher potential risk to the Company, conducting a business relationship with such customer based on applicable High Risk Circumstance as marked above may expose the Company to risk of channeling illicit money

flows. Therefore, the Company will exercise additional caution and conduct Enhanced Due Diligence (EDD) on such Customer by doing the following:

- (a) Consult publically available information;
- (b) Consider sanction issued by UN;
- (c) FATF high risk and non-cooperative jurisdictions,
- (d) FATF and its regional bodies (FSRBs) and Transparency International Corruption Perception Index (TICPI);
- (e) Educate on Offshore financial centers;
- (f) Adequate expertise to understand Customer's ownership structure up to Beneficial Owner and to assess documents presented to the Company.

As per circumstance, the Company will conduct EDD for such High Risk Customer, therefore, the Chief Executive Officer/Chief Operating Officer is recommended to allow continuing business relationship with such Customer.

Recommended by:

Approved by:

<< Name>>>
Compliance Officer

<< Name >>>
<<Designation of Approving Authority (CEO/COO)>>

Dated: _____

PROCEDURES FOR CUSTOMER SIMPLIFIED DUE DILIGENCE MEASURES (SDD)

- The Enrichers Securities (Pvt) Limited conduct Simplified Due Diligence Measures (SDD) in case of Low Risks identified by it.
- The Enrichers Securities (Pvt) Limited however, shall ensure that the low risk it identifies are commensurate with the low risks identified by the country or the Commission. While determining whether to apply SDD

PROC #	PROCEDURES PERFORMED	YES / NO	REASON, IN CASE “NO”
	<ul style="list-style-type: none"> • Where the risks are low and where there is no suspicion on ML/TF/PF, 		
	<ul style="list-style-type: none"> • SDD measures on an applicant/customer, it should document the full rationale behind such decision. 		
	<ul style="list-style-type: none"> • Reducing the frequency of customer identification updates; 		
	<ul style="list-style-type: none"> • Reducing the degree of on-going monitoring and scrutinizing transactions, based on a reasonable monetary threshold; and 		
	<ul style="list-style-type: none"> • Approval from the Senior Management to Low Risk with Proper reasons to mark Low Risk. 		

Please similar wording for justifying a Customer carrying Low Risk"

In the case of Bank, NBFC (mutual funds), DFI, Investment banks, investment company, etc. then the following may be appropriate justification (please name):

"As the Customer is a <<-----Bank/NBFI/DFI/MF/IB/IC ----->> who is subject to requirement to combat money laundering and terrorist financing consistent with the FATF recommendations and is supervised for compliance with those requirements, therefore, we have rated it as Low-Risk Customer",

If the customer is published listed company then,

" As the Customer is a public listed company that is subject to regulatory disclosure requirements to ensure adequate transparency of beneficial ownership, therefore, we have rated it as a Low-Risk Customer."

In the case of an individual customer;

"As the Customer is doing transaction only for the purpose of long term investment but within his/her know and verifiable sources of income, therefore, we have rated such Customer as Low-Risk Customer."

In case of an individual having a close relationship of the CEO/Director/Senior Management of the Brokerage House;

" As the Customer has known to CEO/Director/Senior Management for a long time and has provided all verifiable documents of his Customer Due Diligence (CDD), therefore, we have rated such Customer has been rated, Low-Risk Customer."

PROCEDURES FOR CUSTOMER ENHANCED DUE DILIGENCE (EDD)

In order to know who its Customers are and it shall not keep anonymous accounts or accounts in fictitious names, the <<Securities Broker>> shall be required to take the following steps to ensure that its customer are who they purport themselves to be:

PROC #	PROCEDURES PERFORMED	YES / NO	REASON, IN CASE “NO”
	<ul style="list-style-type: none"> • Additional identification about Nature of Business Relationship. 		
	<ul style="list-style-type: none"> • Ongoing Monitoring of High Risk Client on Regular Interval. • Pattern of Transaction • Internal Control Procedures applied on consistency of the transaction and monitoring of abnormal behavior in the activity of the client. • Volume of Transaction 		
	<ul style="list-style-type: none"> • High Risk Business Relationship • Occupation details • Volume of Assets • Information about source of funds • Proof of Income / Wealth Statement • Information on the source of funds 		
	<ul style="list-style-type: none"> • The reasons for intended or performed transactions. 		
	<ul style="list-style-type: none"> • Selection and Control Procedures applied while selection of clients and transactions. 		
	<ul style="list-style-type: none"> • Monitor transactions to determine whether they are linked and restructured into two or more transactions of smaller values to circumvent the applicable threshold. 		
	<ul style="list-style-type: none"> • Filing of Suspicious Transaction Report (STR) with the FMU, in accordance with the requirement under the law. 		
	<ul style="list-style-type: none"> • The approval of senior management to commence or continue the business relationship. 		

Enhanced Due Diligence Form

1. Name: _____

2. CNIC/ Passport#: _____ Account #: _____

3. Cash Transfer Amount and Mode: _____

4. Purpose and reason of cash transfer:

5. Frequency of funds transfer in a month: _____

6. Country(s) of funds transfer: _____

7. Customer's source of fund: _____

8. Customer's occupation: _____

09. Name of employer/ business title: _____

10. Annual income of the customer: _____

11. Has the customer ever met the counterparty in person (i.e., Face to face): Yes No

12. Have you ever or you are related to or associated with any individual, holding or had held a senior position in public office with the Government: Yes / No

13. If response to question 12 is "Yes" please mention the position of Public office:

14. Please add any relevant additional information which can assist as a due diligence:

Customer Signature

Date: _____

Customer's Name: _____ CDC-Sub A/c: _____ Trading ID: _____

1. **CUSTOMER'S RISK PROFILE:**

Monthly Income in Rs.			Annual Income in Rs.			Last Update	Source (Documents)				
Periodic Review From <<Date> to <<Date>>											
Amount in Rupee			Securities Value in Rupee			Profit/Loss Realized but not received	Customer Worth in Rs.	Trading Limit Allowed A	Risk Tolerance (%age) B	Average Trading Exposure C	Exceeds A+B-C
Total Receipt	Total Payment	Available	Total In	Total Out	Available						

2. **In Compliance with relevant Regulations of the SECP (AML/CFT) Regulation 2018:**

Regulation Reference	Description
6. Customer Due Diligence (3)(C)	Monitoring of accounts/transactions on ongoing basis to ensure that the transactions being conducted are consistent with the regulated person knowledge of the customer, the customer's business and risk profile, including, the source of funds and, updating records and data/ information to take prompt action when there is material departure from usual and expected activity through regular matching with information already available with regulated person.
13. Ongoing Monitoring (1)	All business relations with customers shall be monitored on an ongoing basis to ensure that the transactions are consistent with the regulated person' knowledge of the customer, its business and risk profile and where appropriate, the sources of funds.
14. Reporting of Transaction (4)	The transactions, which are out of character, are inconsistent with the history, pattern, or normal operation of the account or are not commensurate with the level of income of a customer shall be viewed with suspicion, be properly investigated and referred to Compliance Officer for possible reporting to FMU under the AML Act.

3. **Request to Client for Evidence:**

Based on the Clause _____, you are requested to provide us addition Source of Revenue as your Average Trading Activity is not in line with the Sources of Funds provided by you as mentioned above.

Additional Source of Document, if received:

Date: _____ Amount in Rs. _____ Source Document: _____

Reported by:

Compliance Officer: _____ Signature _____

Chief Executive Officer/
Chief Operating Officer: _____ Signature _____