

# PRABHAT FINANCIAL SERVICES LIMITED

and National Stock Exchange of India Limited, Bombay Stock Exchange Limited  
SEBI REGN. NO. INB 230885231, INF 230885231, INB 010885235  
D.P. Central Depository Services (India) Limited. SEBI REGN NO. IN-DP-CDSL-216-2003



Corporate Office : 205, Navjeevan Complex, 29 Station Road, JAIPUR-302006 Phone : +91-141-4028358 / 69 / 70  
Fax : +91-141-4028371 Mobile : 93148 84111 E-mail : pfsindia@hotmail.com Website : www.pfsindia.co.in

By Speed Post A/D

Date: January 5, 2010

Director, FIU-IND,  
Financial Intelligence Unit-India,  
6<sup>th</sup> Floor, Hotel Samrat,  
Chanakyapuri,  
New Delhi- 110021

Dear Sir/Madam,

We are enclosing herewith a copy of our policy framed under the Prevention of Money Laundering Act, 2002. This is for kind perusal and record.

Thanking You,

Yours faithfully,

For Prabhat Financial Services Limited

  
Director



Encl: as above,

**Prabhat Financial Services Limited**  
**205, Navjeevan Complex,**  
**29, Station Road, Jaipur**

**Anti Money Laundering Policy**

**Background :**

1. (a) We had appointed our Director Mr. Vinod Kumar Rathi as our Principal Officer as required under the Prevention of Money Laundering Act, 2002 (PML).  
  
(b) Our Principal Officer, in coordination with Directors of the company, has been entrusted with following responsibilities with regard to implementation of policies and rules framed under PML Act, 2002.
  - (1) To maintain record of all cash transactions of the value of more than Rs 10 lacs or its equivalent in foreign currency, all series of cash transactions integrally connected to each other which have been valued below Rs 10 lakhs or its equivalent in foreign currency where such series of transactions take place within one calendar month and all suspicious transactions whether or not made in cash and including, inter-alia, credits or debits into from any non monetary account such as d-mat account, security account maintained by us. The Principal Officer will consider remotely connected or related transactions for the purpose of reporting of suspicious transactions.
  - (2) To ensure keeping of relevant records for a period of ten years as required under PML Act, 2002.
  - (3) To ensure making and implementation of policies as required under PML Act, 2002.
  - (4) To report suspicious transactions to the competent authority as required under PML Act, 2002.
  - (5) To develop awareness and to conduct regular training programmes for subordinate staff for effective implementation of PML Act, 2009 and rules made under the Act.



2. **Customer due diligence:** Our customer due diligence ("CDD") measures would include the following:

(a) Our customers will be required to register themselves by submitting completed KYC forms and agreement etc in format prescribed by the SEBI, Stock Exchanges and Depositories. We shall have no business relationship with unregistered customer/s.

(b) We shall obtain sufficient information in order to identify persons who beneficially own or control securities account. Whenever it will be apparent that the securities acquired or maintained through an account are beneficially owned by a party other than the client, that party should be identified using client identification and verification procedures. The beneficial owner is the natural person or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person or arrangement.

(c) We shall verify the customer's identity by doing independent and reliable verification of all required documents, data and information furnished by the customer.

(d) We shall identify beneficial ownership and control to determine that which individual(s) ultimately own(s) or control(s) the customer and/or the person on whose behalf a transaction will be conducted;

(e) We shall verify the identify the beneficial ownership of the customer and/or the person on whose behalf a transaction will be conducted by corroborating the information provided by the customer.

(f) We shall ensure to conduct to the best possible extent the ongoing due diligence and scrutiny of the transactions and account throughout the course of our business relationship with the customer to ensure that the transactions being conducted are consistent with our knowledge of the customer, its business and risk profile, taking into account, where necessary, the customer's source of funds.

(g) We shall register no foreign national as our customer.

3. **Policy for acceptance of clients:**

(a) We shall open no account in a fictitious / benami name or on an anonymous basis.



- (b) We shall categorise the customer according to low, medium and high risk perception and shall update their KYC profile on regular basis.
- (c) We shall collect required documents and other information in respect of different classes of clients depending on perceived risk and having regard to the requirement to the Prevention of Money Laundering Act 2002, guidelines issued by RBI and SEBI from time to time.
- (d) We shall ensure that no account is not opened where we are unable to apply appropriate clients due diligence measures/KYC policies. We shall do the regular evaluation whether there is suspicious trading in customer's account to ensure freezing or closure of such account. We shall consult the relevant authorities in determining what action we should take when we observe the suspicious trading in customer's account.
- (e) We shall take help of web sites of SEBI and other enforcement agencies and shall try to put necessary checks and balance to ensure that the identity of the client does not match with any person having known criminal background or is not banned in any other manner, whether in terms of criminal or civil proceedings by any enforcement.

#### 4. Risk-based Approach:

We shall apply due diligence for our customers to determine their category of higher or lower risk. We shall adopt a simplified due diligence process for lower risk categories of customers.

#### 5. Clients of special category (CSC):

We shall categorise our clients based on category of following clients:

- (i) Non resident clients,
- (ii) High net-worth clients,
- (iii) Trust, Charities, NGOs and organizations receiving donations,
- (iv) Companies having close family shareholdings or beneficial ownership,
- (v) Politically exposed persons (PEP). Politically exposed persons are individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior government/judicial/military officers, senior executives of state-owned corporations, important political party officials, etc.
- (vi) Companies offering foreign exchange offerings,



- (vii) Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect or which do not or insufficiently apply FATF standards, where there is unusual banking secrecy, Countries active in narcotics production, Countries where corruption (as per Transparency International Corruption Perception Index) is highly prevalent, Countries against which government sanctions are applied, Countries reputed to be any of the following – Havens / sponsors of international terrorism, offshore financial centers, tax havens, countries where fraud is highly prevalent,
- (viii) Non face to face clients,
- (ix) Clients with dubious reputation as per public information available etc.

#### 6. Client identification procedure:

- (a) We shall register no customer without obtaining completed KYC, duly signed Broker- client agreement / Broker - Sub- Broker-client agreement / D. P. – BO agreement and combined risk disclosure document and all other documents as prescribed by the relevant authority.
- (b) We shall obtain copy of customer PAN card and shall verify customer's PAN details with Income Tax Department web site.
- (c) We shall verify photo copies of all documents obtained in respect of customer's identity, address, bank account and demat account etc. with the help of originals provided by the customer.
- (d) We shall ensure that no existing/potential customer is a politically exposed person (PEP). We shall verify source of funds if customer is a PEP.
- (e) We shall register no customer who fails to provide necessary documents/information as prescribed by the SEBI/Stock Exchanges and as required under PML, Act, 2002.
- (f) We shall register no foreign national as our customer.
- (g) We shall provide necessary training to our dealing staff members to make them fully conversant with the process of client identification.

#### 7. Record Keeping:

- (a) We shall ensure compliance of record keeping requirements as contained in the SEBI Act, 1992, Rules and Regulations made there-under, PML Act, 2002 as well as other relevant legislation, Rules, Regulations, Exchange Bye-laws and Circulars.
- (b) We shall ensure that all customer and transaction records and information are available on a timely basis to the competent investigating authorities. Where appropriate, they can consider retaining certain records, e.g. customer identification, account files, and business correspondence, for periods which may exceed that required under the SEBI Act, Rules and Regulations framed



there-under PMLA 2002, other relevant legislations, Rules and Regulations or Exchange bye-laws or circulars.

**8. Information to be maintained:**

We shall maintain and preserve the following information in respect of transactions referred to in Rule 3 of PMLA Rules:

- I. the nature of the transactions;
- II. the amount of the transaction and the currency in which it denominated;
- III. the date on which the transaction was conducted; and
- IV. the parties to the transaction.

**9. Retention of Records:**

- (a) We shall take appropriate steps to evolve an internal mechanism for proper maintenance and preservation of such records and information in a manner that allows easy and quick retrieval of data as and when requested by the competent authorities. Further, the records mentioned in Rule 3 of PMLA Rules will be maintained and preserved for a period of ten years from the date of cessation of the transactions between the client and us.
- (b) We shall observe the following document retention terms:
  - (1) All necessary records on transactions, both domestic and international, will be maintained at least for the minimum period prescribed under the relevant Act (PMLA, 2002 as well SEBI Act, 1992) and other legislations, Regulations or exchange bye-laws or circulars.
  - (2) Records on customer identification (e.g. copies or records of official identification documents like passports, identity cards, driving licenses or similar documents), account files and business correspondence will also be kept for the same period.



- (3) In case of the records relating to on-going investigations or transactions which have been the subject of a suspicious transaction reporting, we would retain the same until it is confirmed that the case has been closed.

#### **10. Monitoring of transactions:**

- (a) We shall pay special attention to all complex, unusually large transactions / patterns which appear to have no economic purpose. We shall specify internal threshold limits for each class of client accounts and shall pay special attention to the transaction which exceeds these limits.
- (b) We shall ensure to maintain a record of transaction in terms of section 12 of the PMLA 2002 and that transaction of suspicious nature or any other transaction notified under section 12 of the act is reported to the appropriate law authority. Our Compliance Officer will monitor detail of suspicious transactions.
- (c) Our Compliance Officer will randomly examine transactions undertaken by clients to comment on their nature i.e. whether they are in the suspicious transactions.

#### **11. Suspicious Transaction Monitoring & Reporting:**

- (a) We shall ensure to take appropriate steps to identify suspicious transactions and shall develop appropriate procedures for reporting of suspicious transactions to the relevant authority under the PML Act, 2002.
- (b) A list of illustrative circumstances, as detailed here below and which may be in the nature of suspicious transactions, will be provided to the subordinate staff for timely reporting to the Principal Officer. The dealing staff will be advised also to apply their own wisdom to identify the suspicious transactions in addition to the illustrative list.
- (1) Clients whose identity verification seems difficult or clients appears not to cooperate



- (2) Asset management services for clients where the source of the funds is not clear or not in keeping with clients apparent standing /business activity;
- (3) Clients in high-risk jurisdictions or clients introduced by banks or affiliates or other clients based in high risk jurisdictions;
- (4) Substantial increases in business without apparent cause;
- (5) Unusually large cash deposits made by an individual or business;
- (6) Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
- (7) Transfer of investment proceeds to apparently unrelated third parties;
- (8) Unusual transactions by CSCs and businesses undertaken by shell corporations, offshore banks /financial services, businesses reported to be in the nature of export-import of small items.

## 12. Reporting to Financial Intelligence Unit-India

- (a) In terms of the PMLA rules, we shall report information relating to cash and suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND) at the following address:  
Director, FIU-IND,  
Financial Intelligence Unit-India,  
6<sup>th</sup> Floor, Hotel Samrat,  
Chanakyapuri,  
New Delhi-110021.  
Website: <http://fiuindia.gov.in>
- (b) We shall use prescribed formats for reporting of Cash Transactions and Suspicious Transactions as required to report manually and electronically.
- (c) Our Principal Officer has been entrusted with responsibility for timely submission of CTR and STR to FIU-IND. He will maintain utmost confidentiality in filing of CTR and STR to FIU-IND. He will transmit the report by speed/registered post/fax at the notified address.

## 13. Designation of an officer for reporting of suspicious transactions

- (a) We shall properly discharge our legal obligations to report suspicious transactions to the authorities.
- (b) Our Principal Officer would act as a central reference point in facilitating onward reporting of suspicious transactions and for playing an active role in the identification and assessment of potentially suspicious transactions.
- (c) Name, designation and addresses (including e-mail addresses) of the Principal Officer had been intimated to the Office of the Director-FIU. Our one of the Director has been designated as Principal Officer of our company.





#### 14. Employees' Hiring/Employee's Training/ Investor Education

##### (a) Hiring of Employees

The Directors of the company will adhere to adequate screening procedures to ensure high standards when hiring employees. They would identify the key positions within the organization structures having regard to the risk of money laundering and terrorist financing and would ensure that employees taking up such key positions are suitable and competent to perform their duties.

##### (b) Employees' Training

Directors of the company and the Principal Officer will ensure to conduct an ongoing employee training programme so that the members of the staff are adequately trained in AML and CFT procedures. Training requirements will have specific focuses for frontline staff, back office staff, compliance staff, risk management staff and staff dealing with new customers.

##### (c) Investors Education

We shall try to educate our customers that AML/CFT measures require demanding certain information from them which may be of personal nature or which has hitherto never been called for. Such information may/would include documents evidencing source of funds/income tax returns/bank records etc. We would sensitize our customers about these requirements in respect of our obligation and responsibilities as an intermediary under PML Act, 2002. Customer will be educated to go through our AML Policy put up at our website [www.pfslindia.co.in](http://www.pfslindia.co.in)

Place: Jaipur  
Date: November 25, 2009

For Prabhat Financial Services Ltd.



*[Handwritten Signature]*  
Director



# PRABHAT FINANCIAL SERVICES LIMITED



CIN No. U67190UP1995PLC017537  
GSTIN No. : 08AAACP8036A1ZR

Corporate Office : 205, Navjeevan Complex, 29 Station Road, Jaipur-302006  
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Member : National Stock Exchange of India Limited, Bombay Stock Exchange Limited  
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D P : Central Depository Services (India) Limited, SEBI REGN NO. IN-DP-CDSL-216-2003

## Addendum to Anti Money Laundering Policy dated November 25, 2009

### I. Risk Assessment and Risk- based Approach:

We shall carry out risk assessment to identify, assess and take effective measures to mitigate money laundering and terrorist Financing risk with respect to our clients, countries or geographical areas, nature and volume of transactions, payment methods used by clients, etc. Our risk assessment shall also take into account any country specific information that is circulated by the Government of India and SEBI from time to time, as well as, the updated list of individuals and entities who are subjected to sanction measures as required under the various United Nations' Security Council Resolutions (these can be accessed at [http://www.un.org/sc/committees/1267/aq\\_sanctions\\_list.shtml](http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml) and <http://www.un.org/sc/committees/1988/list.shtml>). We shall do the risk categorization of our clients in following manner.

#### A. Factors of Risk Perception with respect to clients' location : (Registered / Correspondence/ other address )

Clients' Category	Risk Perception
- Face to Face and Direct clients residing in Rajasthan	Low Risk
- Face to Face clients of Sub Brokers and A.Ps.	Low Risk
- Client Introduced by Direct and Face to Face Clients who are residing in Rajasthan	Low Risk
- Client Introduced by Direct and Face to Face clients who are residing outside Rajasthan	Medium Risk
- Client Introduced by Sub Brokers and A.Ps	Low Risk
- Direct Clients residing outside Rajasthan	Medium Risk
- Non resident Clients	High Risk

*Sh. Babasaheb Prabhat*

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HEAD OFFICE : Second Floor, J-42 Saket, New Delhi - 110017 Ph. 011-65653125

## B. Nature of Business Activity and Trading Turnover etc during the year

- Retail clients ( average daily intra day turnover : CM segment < Rs 25 Lakhs or Derivatives segment < Rs 1 Crore or daily delivery turnover of < Rs 10 Lakhs ) Low Risk
- Retail clients ( average daily intra day turnover : CM segment > Rs 25 Lakhs Derivatives segment > Rs 1 Crore or daily delivery turnover of > Rs 10 Lakhs) Medium Risk
- HNI Clients ( average daily intra day turnover : CM segment < Rs 35 Lakhs or Derivatives segment < Rs 2 Crore or daily delivery turnover of < Rs 15 Lakhs ) Low Risk
- HNI Clients ( average daily intra day turnover : CM segment > Rs 35 Lakhs or Derivatives segment > Rs 2 Crore or daily delivery turnover of > Rs 15 Lakhs ) Medium Risk

## C. Manner of Making Payment

- Regular payment By A/c payee cheque or by digital transfer from the Bank accounts already mapped with us Low Risk
- Payment by A/c payee cheque or by digital transfer from the Bank Accounts not reported to us or from third party bank accounts Medium Risk
- Payment through Banker's Cheque / Demand Draft High Risk
- Client of Special Categories as defined under Point 5 of PMLA policy dated November 25, 2009 High Risk

## 2. Reliance on third party for carrying out Client Due Diligence (CDD):

At present we have not emarged any third party to undertake CDD exercise. However, in future we may rely on a third party for the purpose of (a) identification and verification of the identity of a client and (b) determination of whether the client is acting on behalf of a beneficial owner, identification of the beneficial owner and verification of the identity of the beneficial owner. We shall remilate, supervise or monitor such third party for compliance with CDD and have measures in place and record-keeping requirements in line with the obligations under the PML Act.

3. We shall appoint one of our Director as Designated Director as required vide SEBI Circular No. CIR/MIRSD/1/2014 dated March 12, 2014.


4. Committee consistins4 of Director Mr. S. P. Kabra, Mr. Ashok Kumar Sharma and Mr. Vinod Kumar Rathi will conduct half yearly/yearly periodic review of PMLA policies of the company and will conduct ongoing training program for related employees of the company.

5. Record keeping, requirements will be comply with under PML Act, 2002 and also as per SEBI Circular No. CIR/MIRSD/1/2014 dated March 12, 2014.

6. Committee consisting of Director Mr. S. P. Kabra, Mr. Ashok Kumar Sharma and Mr. Vinod Kumar Rathi will ensure monitoring of transactions/value of securities in demat accounts of the BO/s based on their income and nature of business/occupation.

Place: Jaipur

Date: March 17, 2014

  
(S. P. Kabra)



# PRABHAT FINANCIAL SERVICES LIMITED

Member : National Stock Exchange of India Limited, Bombay Stock Exchange Limited  
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D.P : Central Depository Services (India) Limited, SEBI REGN NO. IN-DP-CDSL-216-2003



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## Addendum to Anti Money Laundering Policy dated November 25, 2009

### **Client Due Diligence:**

Under CDD process, we shall periodically collect and update all documents, data and information in respect of all beneficial owners at least once in two years and in respect of Stock Broking Clients at least once in a year.

Place: Jaipur

Date: June 6, 2016

For Prabhat Financial Services Ltd.

*Srinivas Kumar*

Director



# PRABHAT FINANCIAL SERVICES LIMITED



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GSTIN No. : 08AAACP6036A1ZR

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## ADDENDUM TO AML POLICY DATED November 25, 2009 and subsequent Addendum

Approved by Board on August 09, 2019

On July 04, 2018 a master circular no SEBI/HO/MIRSD/DOS3/CIR/P/2018 consolidating all the requirements/ instructions has been issued by SEBI which supersedes all the earlier circulars. We shall adhere to monitor:

- All cash transactions of the value of more than Rs 10 lakhs or its equivalent in foreign currency.
- All series of cash transactions integrally connected to each other which have been valued below Rs 10 lakhs or its equivalent in foreign currency where such series of transactions take place within one calendar month and the aggregate value of such transactions exceeds rupees ten lakh;
- All suspicious transactions whether or not made in cash and including inter-alia credits or debits into from any non monetary account such as demat account, security account maintained by the registered intermediary.

It may, however, be clarified that for the purpose of suspicious transactions reporting, apart from 'transactions integrally connected', 'transactions remotely connected or related' shall also be considered

***We shall follow Procedure for freezing of funds, financial assets or economic resources or related services as per details given here below***

Section 51A of the Unlawful Activities (Prevention) Act, 1967 (UAPA), relating to the purpose of prevention of, and for coping with terrorist activities was brought into effect through UAPA Amendment Act, 2008. In this regard, the Central Government has issued an Order dated August 27, 2009 detailing the procedure for the implementation of Section 51A of the UAPA.

Under the aforementioned Section, the Central Government is empowered to freeze, seize or attach funds and other financial assets or economic resources held by, on behalf of, or at the direction of the individuals or entities listed in the Schedule to the Order, or any other person engaged in or suspected to be engaged in terrorism. The Government is also further empowered to prohibit any individual or entity from making any funds, financial assets or economic resources or related services available for the benefit of the individuals or entities listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism.

*V. C. Mehta*



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HEAD OFFICE : Second Floor, J-42 Saket, New Delhi - 110017 Ph. 011-65653125

The stock exchanges, depositories and registered intermediaries shall ensure effective and expeditious implementation of the procedure laid down in the UAPA Order dated August 27, 2009 as listed below<sup>b</sup>

- a) On receipt of the updated list of individuals/ entities subject to UN sanction measures (hereinafter referred to as 'list of designated individuals/ entities) from the Ministry of External Affairs (MHA)'; SEBI will forward the same to stock exchanges, depositories and registered intermediaries for the following purposes:
- i. To maintain updated designated lists in electronic form and run a check on the given parameters on a regular basis to verify whether individuals or entities listed in the schedule to the Order (referred to as designated individuals/entities) are holding any funds, financial assets or economic resources or related services held in the form of securities with them.
  - ii. In the event, particulars of any of customer/s match the particulars of designated individuals/entities, stock exchanges, depositories and intermediaries shall immediately, not later than 24 hours from the time of finding out such customer, inform full particulars of the funds, financial assets or economic resources or related services held in the form of securities, held by such customer on their books to the Joint Secretary (IS.I), Ministry of Home Affairs, at Fax No.011-23092569 and also convey over telephone on 011- 23092736. The particulars apart from being sent by post should necessarily be conveyed through e-mail at [jsis@nic.in](mailto:jsis@nic.in).
  - iii. Stock exchanges, depositories and registered intermediaries shall send the particulars of the communication mentioned in (ii) above through post/fax and through e-mail ([sebi\\_uapa@sebi.gov.in](mailto:sebi_uapa@sebi.gov.in)) to the UAPA nodal officer of SEBI, Officer on Special Duty, Integrated Surveillance Department, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051 as well as the UAPA nodal officer of the state/UT where the account is held, as the case may be, and to FIU-IND.
  - iv. In case the aforementioned details of any of the customers match the particulars of designated individuals/entities beyond doubt, stock exchanges, depositories and registered intermediaries would prevent designated persons from conducting financial transactions, under intimation to Joint Secretary (IS.I), Ministry of Home Affairs, at Fax No. 011-23092569 and also convey over telephone on 011-23092736. The particulars apart from being sent by post should necessarily be conveyed through e-mail at [jsis@nic.in](mailto:jsis@nic.in).
  - v. Stock exchanges, depositories and registered intermediaries shall also file a Suspicious Transaction Report (STR) with FIU-IND covering all transactions in the accounts covered by paragraph 2.9.2 (a) (ii) above carried through or attempted, as per the prescribed format.
- b) On receipt of the particulars as mentioned in paragraph 2.9.3 (a) (ii) above, IS-I Division of MHA would cause a verification to be conducted by the State Police and /or the Central Agencies so as to ensure that the individuals/ entities identified by the stock exchanges, depositories, registered intermediaries are the ones listed as designated individuals/entities and the funds, financial assets or economic resources or related

V. C. N. S. P.



services, reported by stock exchanges, depositories, registered intermediaries are held by the designated individuals/entities. This verification would be completed within a period not exceeding 5 working days from the date of receipt of such particulars.

- c) In case, the results of the verification indicate that the properties are owned by or held for the benefit of the designated individuals/entities, an order to freeze these assets under section 51A of the UAPA would be issued within 24 hours of such verification and conveyed electronically to the concerned depository under intimation to SEBI and FIU-IND. The order shall take place without prior notice to the designated individuals/entities.

**d) Implementation of requests received from foreign countries under U.N. Securities Council Resolution 1373 of 2001.**

- i. U.N. Security Council Resolution 1373 obligates countries to freeze without delay the funds or other assets of persons who commit, or attempt to commit, terrorist acts or participate in or facilitate the commission of terrorist acts; of entities or controlled directly or indirectly by such persons; and of persons and entities acting on behalf of, or at the direction of such persons and entities, including funds or other assets derived or generated from property owned or controlled, directly or indirectly, by such persons and associated persons and entities.
- ii. To give effect to the requests of foreign countries under U.N. Security Council Resolution 1373, the Ministry of External Affairs shall examine the requests made by the foreign countries and forward it electronically, with their comments, to the UAPA nodal officer for IS-I Division for freezing of funds or other assets.
- iii. The UAPA nodal officer of IS-I Division of MHA, shall cause the request to be examined, within five working days so as to satisfy itself that on the basis of applicable legal principles, the requested designation is supported by reasonable grounds, or a reasonable basis, to suspect or believe that the proposed designee is a terrorist, one who finances terrorism or a terrorist organization, and upon his satisfaction, request would be electronically forwarded to the nodal officer in SEBI. The proposed designee, as mentioned above would be treated as designated individuals/entities.
- iv. Upon receipt of the requests from the UAPA nodal officer of IS-I Division, the list would be forwarded to stock exchanges, depositories and intermediaries and the procedure as enumerated at paragraphs 2.9.2 (a) and (b) shall be followed.
- v. The freezing orders shall take place without prior notice to the designated persons involved.

**e) Procedure for unfreezing of funds, financial assets or economic resources or related services of individuals/entities inadvertently affected by the freezing mechanism upon verification that the person or entity is not a designated person**

- i. Any individual or entity, if it has evidence to prove that the freezing of funds,

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financial assets or economic resources or related services, owned/held by them has been inadvertently frozen, shall move an application giving the requisite evidence, in writing, to the concerned stock exchanges/depositories and registered intermediaries. The stock exchanges/depositories and registered intermediaries shall inform and forward a copy of the application together with full details of the asset frozen given by any individual or entity informing of the funds, financial assets or economic resources or related services have been frozen inadvertently, to the nodal officer of IS-I Division of MHA as per the contact details given in paragraph 5(ii) above within two working days. The Joint Secretary (IS-I), MHA, being the nodal officer for (IS-I) Division of MHA, shall cause such verification as may be required on the basis of the evidence furnished by the individual/entity and if he is satisfied, he shall pass an order, within fifteen working days, unfreezing the funds, financial assets or economic resources or related services, owned/held by such applicant under intimation to the concerned stock exchanges, depositories and registered intermediaries. However, if it is not possible for any reason to pass an order unfreezing the assets within fifteen working days, the nodal officer of IS-I Division shall inform the applicant.

**f) Communication of Orders under section 51A of Unlawful Activities (Prevention) Act.**

- i. All Orders under section 51A of the UAPA relating to funds, financial assets or economic resources or related services, would be communicated to stock exchanges, depositories and intermediaries through SEBI.

For Prabhat Financial Services Limited

  
Director



Director

Place: Jaipur  
Date: August 09, 2019





CIN No. U67190UP1995PLC017537

# PRABHAT FINANCIAL SERVICES LIMITED

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Member : National Stock Exchange of India Limited, Bombay Stock Exchange Limited, SEBI REGN. NO. INZ000169433  
D P : Central Depository Services (India) Limited, SEBI REGN NO. IN-DP-CDSL-216-2003

**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED IN THE MEETING OF BOARD OF DIRECTORS OF THE COMPANY HELD ON WEDNESDAY, SEPTEMBER 07, 2022 AT 11.00 A.M. AT THE REGISTERED OFFICE AT 118/610-A, KAUSHAL PURI, KANPUR-208012 (U. P.) OF THE COMPANY.**

Resolved that review report of Anti Money Laundering Policy dated November 25, 2009 and subsequent Addendum/s made to AML policy and review report of Policy for Surveillance Obligation of Depository Participant and Stock Broker dated August 27, 2021 submitted by the Directors, Mr. Ashok Kumar Sharma and Mr. Vinod Kumar Rathi be approved and be taken on record of the Company.

For and on behalf of the Board  
of Prabhat Financial Services Limited

Sd-

(Guljhari Lal Sharma)  
Chairman

**CERTIFIED TO BE TRUE COPY**

For Prabhat Financial Services Ltd.

*V. C. Rathi*  
Director

REGD OFFICE : 118/610-A, Kaushal Puri , Kanpur-208012 (U. P.) Mobile-9889533633, Ph.0512-2526347  
HEAD OFFICE : Second Floor, J-42 Saket, New Delhi- 110017 Ph.011-65653125



CIN No. U67190UP1995PLC017537

# PRABHAT FINANCIAL SERVICES LIMITED

Corporate Office: 205, Navjeevan Complex, 29 Station Road, Jaipur-302006

Phone : +91-141-4162021-22-23-24 Fax : +91-141-4162050 Mobile : 93148 84111

E-mail : pfsindia@hotmail.com Website : www.pfsindia.co.in



Member : National Stock Exchange of India Limited, Bombay Stock Exchange Limited, SEBI REGN. NO. JNZ000169433  
D P : Central Depository Services (India) Limited. SEBI REGN NO. IN-DP-CDSL-216-2003

EXTRACTS OF MEETING OF BOARD OF DIRECTORS OF PRABHAT FINANCIAL SERVICES LTD. ("THE COMPANY") HELD ON FRIDAY, THE NOVEMBER 10, 2023 AT ITS CORPORATE OFFICE AT 205, NAVJEEVAN COMPLEX, 29, STATION ROAD, JAIPUR AT 11 A. M.

"RESOLVED that Mr. Shri Prakash Kabra, Director of the company be and hereby appointed as the Principal Officer as required under the Prevention Of Money Laundering ACT, 2002 and as required vide SEBI Circular No. ISD/CIR/RR/AML/1/06 dated January 18, 2006.

Further resolved that a certified copy of this resolution be provided to any Regulatory Authority as and when required.

For and on behalf of the Board  
of Prabhat Financial Services Limited

-sd-  
(Guljhari Lal Sharma)  
Chairman

**CERTIFIED TO BE TRUE COPY**

For Prabhat Financial Services Ltd  
Shri Prakash Kabra  
Director

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D P : Central Depository Services (India) Limited. SEBI REGN NO. IN-DP-CDSL-216-2003

**EXTRACTS OF MEETING OF BOARD OF DIRECTORS OF PRABHAT FINANCIAL SERVICES LTD. ("THE COMPANY") HELD ON WEDNESDAY, June 12, 2024 AT ITS CORPORATE OFFICE AT 205, NAVJEEVAN COMPLEX, 29, STATION ROAD, JAIPUR AT 11 A. M.**

Resolved that in compliance of SEBI Circular No. **SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2024/78 dated June 06, 2024** regarding Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) /Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under and also in continuation of Anti-Money Laundering Policy dated November 25, 2009 and its subsequent Addendums be reviewed and taken on record of the Company.

Further resolved that a certified copy of this resolution be provided to SEBI, Stock Exchange, Depository and any other Regulatory Authority as and when required.

For and on behalf of the Board  
of Prabhat Financial Services Limited

Sd-

(Guljhari Lal Sharma)  
Chairman

**CERTIFIED TO BE TRUE COPY**

For Prabhat Financial Services Ltd.

*Shri Prabhat Kataria*

Director

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