

LUNAWAT GEMS & JEWELS PVT. LTD.

G-1-42, SEZ II, SITAPURA IND. AREA, JAIPUR

ANTI MONEY LAUNDERING POLICY

This policy represents the basic standards of anti-money laundering policy of **Lunawat Gems & Jewels Pvt. Ltd., Jaipur.**

This policy is ineffective, and copies of this policy will be distributed to all suppliers and all relevant employees must be thoroughly familiar with and make use of the material contained in this Policy.

Definitions & procedures

Money Laundering

Money laundering is a generic term used to describe any process that conceals the origin or derivation of the proceeds of crime so that the proceeds appear to be derived from a legitimate source.

Money laundering is sometimes wrongly regarded as an activity that is associated only with organized crime and drug trafficking. It is not. It occurs whenever any person deals with another person's direct or indirect benefit from crime.

Money laundering is a crime that is most often associated with banking and money remittance services. Whilst banks are often an essential part of successful laundering schemes, the financial and related services that Licensees offer are also vulnerable to abuse by money launderers.

Additional Due Diligence measures for financial institutions

We are undertaking following additional due diligence measures while establishing and maintaining correspondent relationships:

- ❖ Obtaining sufficient information about a respondent company to avoid any relationships with "shell - banks"
- ❖ Determining from publicly available sources of information the reputation of a respondent company including whether nit has been subject to money laundering or terrorist financing investigation or other regulatory action:
- ❖ Assessing the respondent institution anti- money laundering and terrorist financing controls on a periodic basis.

Goals and objectives

The main purpose of the policy is to establish the essential standards designed to prevent the money laundering activities. Other objectives pursued by this policy are as follows:

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- ❖ We are promoting a “Know Your Customer” policy as a cornerstone principle for the business ethics and practices.
- ❖ Conducting self-assessments of compliance with AML policy and procedures.

Adherence to this policy is absolutely fundamental for ensuring fully comply with applicable antimoney laundering legislation.

The company will not have any relationship with any shell banks.

The company is committed to examining its anti-money laundering strategies, goals and objectives on ongoing basis and maintain an effective AML Policy.

Monitoring and reporting of suspicious transactions/activity

All personnel must be diligent in monitoring for any unusual and potentially suspicious transactions/ activity basing on the relevant criteria applicable in the national or international jurisdiction.

The reporting of suspicious transactions /activity must comply with the international law/regulations.

Record keeping

Records shall be kept of all documents obtained for the purpose of identification and all transaction data as well as other information related to money laundering matters in accordance with the applicable anti - money laundering law/ regulation of the country.

All records must be kept for at least 5 years.

Training

Training on anti- money laundering will be provided to those new employees who work directly with customers and to those employees who work in other areas that may be exposed to money laundering and terrorist financing threats which includes.

Identification and reporting of transactions that must be reported to government authorities, example of different forms of money laundering and internal policies to prevent money laundering against targeted foreign countries and shall cooperate fully with government agencies, self-regulatory organizations, and law enforcement officials.

This policy is endorsed by following person as partner of this company.

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