

Anti-Money Laundering (AML) Policy

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SEBI Registration Number: INH000010706

BSE Enlistment: 5671

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Introduction

This document outlines the Anti-Money Laundering (AML) Policy of Vishal Vallabhbhai Bhingaradiya, a SEBI-registered Research Analyst Firm (Registration Number: INH000010706, BSE Enlistment: 5671).

This policy complies with the Prevention of Money Laundering Act, 2002 (PMLA), its rules, and SEBI guidelines, including the SEBI Circular dated February 17, 2025. It ensures that the firm's operations — including services like Intraday Trading, Swing Trading, Research Reports, and IPO Analysis — are not misused for money laundering or terrorist financing activities.

Objective

The objective of this policy is to establish a robust framework for detecting and reporting suspicious transactions while ensuring compliance with applicable laws and regulations.

This policy covers:

- Policy for acceptance of clients.
- Procedure for identifying clients.
- Transaction monitoring and reporting, especially Suspicious Transactions Reporting (STR).

Client Due Diligence (CDD) Process

1. Policy for Acceptance of Clients

- No accounts will be opened in fictitious or anonymous names.
- Accounts will not be opened if adequate client due diligence (KYC) measures, including PAN card verification, cannot be applied.
- All clients must be KYC registered and provide valid documentation as mandated by SEBI.
- Client identities will be verified against SEBI's list of banned persons/entities and stock exchange records.
- Risk assessments will be conducted, including checks against sanctions lists maintained by

United Nations Security Council Resolutions.

2. Procedure for Identifying Clients

- Client identities will be verified using reliable sources to ensure accurate and complete KYC details, including PAN card and address proof.
- Any discrepancies in documentation will be escalated to the Compliance Officer for resolution.
- Client records will be updated regularly to comply with SEBI's requirement for KYC updates by June 30, 2025, for existing clients.

3. Maintenance of Records

- All client records, including KYC documents and transaction details, will be maintained for a minimum of 10 years or until the resolution of any regulatory action, as per SEBI and PMLA guidelines.
- Records will be securely stored at the office address: 26 - Vandna Soc, Nana Varachha, Near Amidhara Soc, Surat - 395006.

Monitoring and Reporting of Transactions

1. Monitoring Transactions

- Transactions at Vishal Vallabhbbhai Bhingaradiya involve service fees for offerings such as Intraday Trading, Swing Trading, Research Reports, and IPO Analysis, accepted only through banking channels (e.g., UPI or bank transfers to the account listed on www.vistanivesh.com).
- No cash transactions will be permitted for fee collection.
- Transactions will be monitored for unusual or suspicious patterns, with records maintained for audit purposes.

2. Reporting Suspicious Transactions

- Suspicious transactions will be documented and reported to the Compliance Officer, including client details, transaction nature, and reasons for suspicion.

- The Compliance Officer will ensure timely reporting of suspicious transactions to the Financial Intelligence Unit – India (FIU-IND).
- Confidentiality will be maintained during the filing of Cash Transaction Reports (CTR) and Suspicious Transaction Reports (STR).

Roles and Responsibilities

Principal Officer

- **Name:** Vishal Vallabhbhai Bhingaradiya
- **Contact:** +91 7874229099 | vishalbhingradiya0@gmail.com

Responsibilities:

- Communicate the AML policy to all employees and ensure regular training.
- Oversee compliance with AML regulations and SEBI guidelines.
- Report suspicious transactions to FIU-IND promptly.
- Address employee queries regarding AML policy implementation.

Onboarding Staff

- Adhere to KYC and CDD procedures during client onboarding, ensuring PAN card and 5address verification.
- Report any suspicious activity observed during client interactions to the Compliance Officer.
- Maintain compliance with AML laws and internal policies.

Communication of Policy

- A copy of this policy will be provided to all relevant staff members.
- Annual training sessions will be conducted to ensure awareness and adherence to AML and SEBI regulations.
- The policy will be accessible on www.vistanivesh.com under the Compliance and Disclosures section for transparency.

Compliance and Cooperation

Vishal Vallabhbhai Bhingaradiya will:

- Ensure full compliance with SEBI regulations, PMLA, and other statutory requirements, including submitting periodic reports to the BSE Administration and Supervision Limited (BASL).
- Cooperate with law enforcement authorities and provide client information when legally required.
- Maintain a grievance redressal mechanism, accessible via:

- **Email:** vishalbhingradiya0@gmail.com
- **Phone/WhatsApp:** +91 7874229099 .+919925524501

(Responses provided within 21 days as per SEBI guidelines.)

- Address fraudulent activities by clarifying that Vishal Vallabhbbhai Bhingaradiya is not responsible for unauthorized use of its SEBI registration number (INH000010706) and will report such incidents to SEBI at 022-26449000 or sebi@sebi.gov.in.

Review of Policy

The AML policy will be reviewed annually or as needed to align with updated SEBI and PMLA regulations, ensuring its effectiveness and relevance.