

AML AND CFT POLICY

Sungrow Research and Financial Services Pvt. Ltd.(Research Analyst)
SEBI Registration No.: INH000014067

1. Purpose

Sungrow Research and Financial Services Pvt. Ltd. ("Sungrow Research") is committed to maintaining appropriate measures to prevent and detect activities relating to money laundering, terrorist financing and other unlawful financial activities.

This Policy has been adopted with reference to the applicable provisions of the **Prevention of Money Laundering Act, 2002 (PMLA)**, the rules made thereunder and the applicable guidelines issued by the **Securities and Exchange Board of India (SEBI)** from time to time.

2. Scope

This Policy applies to Sungrow Research, its relevant employees, associated persons and other personnel involved in client onboarding, client servicing, compliance and related activities, to the extent applicable to their respective functions.

3. Customer Due Diligence and KYC

Sungrow Research follows applicable Know Your Client (KYC) and Customer Due Diligence (CDD) requirements before providing research services to clients.

Appropriate client identification and verification information is obtained and maintained in accordance with applicable regulatory requirements.

Sungrow Research does not knowingly establish or maintain relationships with anonymous, fictitious or benami clients.

4. Risk-Based Approach

Sungrow Research applies a risk-based approach to client acceptance and monitoring, taking into consideration relevant factors such as the nature of the client, business relationship, geographical considerations and other applicable risk indicators.

Where enhanced due diligence is considered necessary, appropriate additional information and verification may be obtained in accordance with applicable requirements.

5. Client Acceptance

Sungrow Research reserves the right to decline or discontinue a client relationship where:

- the required KYC/CDD information cannot be satisfactorily obtained or verified;
- the identity or beneficial ownership of the client cannot be adequately established;
- information provided by the client is found to be materially inconsistent or unreliable; or

- circumstances give rise to concerns regarding money laundering, terrorist financing or other unlawful activity.

6. Monitoring and Identification of Suspicious Activity

Sungrow Research maintains appropriate procedures for identifying and reviewing activities that may give rise to suspicion of money laundering or terrorist financing, to the extent applicable to its business and regulatory obligations.

Relevant transactions, activities and client information may be reviewed where required under applicable law and regulatory requirements.

7. Record Keeping

Sungrow Research maintains applicable client identification, transaction, communication and other records for the periods prescribed under applicable laws and regulatory requirements.

Records are maintained in a manner that enables them to be made available to the appropriate regulatory or enforcement authorities whenever legally required.

8. Reporting of Suspicious Transactions

Where a transaction or activity is required to be reported under applicable law, Sungrow Research shall take appropriate steps for reporting such information to the competent authority, including the **Financial Intelligence Unit – India (FIU-IND)**, wherever applicable.

Information relating to suspicious transaction reporting shall be handled in accordance with applicable confidentiality and legal requirements.

9. Principal Officer

Sungrow Research has designated a responsible officer for overseeing applicable AML/CFT compliance requirements, including coordination of regulatory obligations and reporting requirements.

The details of the designated **Principal Officer** are maintained and communicated to the competent authority/FIU-IND as required under applicable regulations.

10. Employee Awareness and Training

Relevant employees and associated persons are made aware of their responsibilities relating to AML/CFT, KYC, client due diligence, identification of suspicious activities and applicable reporting obligations.

Appropriate training and awareness measures are undertaken based on the nature and requirements of their respective functions.

11. Internal Controls and Review

Sungrow Research maintains appropriate internal controls and procedures for implementation of its AML/CFT obligations.

This Policy and related procedures may be reviewed and updated from time to time to reflect changes in applicable laws, regulations, SEBI requirements and the nature of the Company's business.

12. Compliance with Applicable Laws

Sungrow Research is committed to complying with applicable provisions of the PMLA, rules made thereunder and applicable SEBI AML/CFT requirements, as amended or updated from time to time.

13. Non-Disclosure

Information relating to suspicious transaction identification, review or reporting shall be handled in accordance with applicable confidentiality and non-disclosure requirements. No client or other person shall be informed of a suspicious transaction report where such disclosure is prohibited by applicable law.

14. Policy Statement

Sungrow Research does not support, facilitate or knowingly participate in activities involving money laundering, terrorist financing or other unlawful financial activities.

The Company is committed to maintaining appropriate systems, procedures and controls proportionate to the nature and scale of its business for preventing and addressing such activities

