PEE AAR SECURITIES LTD

Ag-5, Shalimar bagh, Delhi-110088

Training of the management and staff and their recruitment Policy of PEEAAR SECURITIES LIMITED

Training of the management and staff and their recruitment :

Basic Understanding of the internal policies and procedures related to the Prevention of Money Laundering Act, 2002 by the management and staff and their training:

- (i) The senior management of the company will provide the written copy of prevention of money laundering and terrorist financing policies to be followed to all the existing management and relevant staff that handle account information, securities transactions, money and customer records etc. whether in branches, departments or subsidiaries.
- (ii) In case of new recruitment, the person responsible to such recruitment will provide the written copy of prevention of money laundering and terrorist financing policies to be followed to such new employee.
- (iii)The such management and relevant staff including new employee will be responsible to understand clearly the Policies and will follow the spirit of the suggested measures in Part II and the requirements as laid down in the Prevention of Money Laundering Act, 2002 and to discourage and identify any money laundering or terrorist financing activities.

Training of the management and staff

- (i) Training on Anti Money Laundering must be provided immediately introduction of these policies to every existing management and staff of the company and to every new recruited staff within one month after recruitment of such staff with follow-up training for every management and staff of the company every 2 years. (This training must cover the management and staff with customer contact or authorized to take policy decisions).
- (ii) Any training on Anti Money Laundering must at least cover knowledge about general requirement regarding:
 - Meaning of anti money laundering requirements and possible risk or not adhering to the requirements;
 - Requirement for adequate client identification and documentation procedures;
 - Recognition of suspicious transaction or suspicious activities of the clients;

- Ways and means of money laundering with context to day to day activities of the company; and
- Reporting of the suspicious transaction or activities of the client.

Screening Procedure/Recruitment of Staff:

The person responsible for recruitment should have adequate screening procedures in place to ensure high standards when hiring employees. They should identify the key positions within their own organization structures having regard to the risk of money laundering and terrorist financing and the size of their business and ensure the employee staking up such key positions are suitable and competent to perform their duties.

For, PEEAAR SECURITIES LIMITED

Nikhil Gupta (Director)