



Muhammad Tariq Moti Securities (Pvt) Limited

BRP # 064, TREC Holder Code 186, TREC Holder / Broker: Pakistan Stock Exchange Limited.
(Formerly: Karachi Stock Exchange Limited), 1st Floor, Room no. 36, Stock Exchange Building, Stock Exchange Road, Karachi.
Phone no. +9221 32421624, 32419415, 32410835, Website: tariqmoti.com.pk, Email id: admin@tariqmoti.com.pk.

Date: _____

Anti –Money Laundering Policy

Objective

The objective of this policy is to ensure that the services of the company are not used to launder the proceeds of crime and that all of the company's staff is aware of their obligations and the need to remain vigilant in the fight against money laundering/terrorist financing. This Policy also provides a framework to comply with applicable laws, Regulatory guidelines specially related with detection And reporting of suspicious activities.

Scope

The Policy is mandatory for the company and all its Employees. The Company should use its best endeavors to ensure that the Employees are not involved in money laundering and terrorist financing.

Definition

Money Laundering is the criminal practice of processing ill-gotten gains or “dirty” money, through a series of transactions, so that they appear to be the proceeds from legal activities, it is also the process to change the identity of illegally obtained money by using banking channel so that it appears to have originated from a legitimate source.

Anti-Money Laundering Policy

It is the Policy of Company that:

- Statutory, regulatory and legal obligations to prevent Money Laundering and Terrorist Financing are fully complied with.
- System and controls are implemented and reviewed on frequently in order to minimize the risk of the Company's services being abused for the purposes of Money Laundering and Terrorist Financing
- A money laundering risk assessment of the Company's services and customer base are undertaken and appropriate policies, procedures and due diligence controls are applied proportionate to that risk.

Muhammad Tariq Moti
C.E.O

Muhammad Mustafa Tariq
Director/ Compliance Officer



Muhammad Tariq Moti Securities (Pvt) Limited

BRP # 064, TREC Holder Code 186, TREC Holder / Broker: Pakistan Stock Exchange Limited.

(Formerly: Karachi Stock Exchange Limited), 1st Floor, Room no. 36, Stock Exchange Building, Stock Exchange Road, Karachi.

Phone no. +9221 32421624, 32419415, 32410835, Website: tariqmoti.com.pk, Email id: admin@tariqmoti.com.pk.

- The company would not do business with
 - ✓ Individuals / entities subject to UN sanctions
 - ✓ Individuals / entities under OFAC or local country sanctions as applicable
 - ✓ Unauthorized money changers/prices bond dealers
 - ✓ Customers hiding beneficial ownership of the account
 - ✓ Clients or business segment black listed by the Regulators
 - ✓ Governments officials willing to open government's accounts in their personal names.
- Any customer relationship where the customer's conduct gives the Company a reasonable cause to believe or suspect involvement with illegal activities is required to be reported to the Regulators or relevant authorities
- Management shall establish criteria of identifying and assessing Money Laundering and Terrorist Financing risks that may arise in relation to new products, services and business practices including the review of existing products and services on on-going basis.

Customer Due Diligence (CDD)

CDD is closely associated with the fight against money-laundering, Companies around the world are increasingly recognizing the importance of ensuring that they have adequate controls and procedures in place to that they know the customers with whom they are dealing. Adequate due diligence on new and existing customers is a key part of these controls. Without this due diligence, our Company can be exposed to customers, legal and financial risks.

It is a Policy of the Company that:

- Prior to establishing a relationship with a new customers, basic background information about the customer should be obtained including identifying the customer and verifying the customers identity in the basic of documents, data or information obtained from customer and/or from reliable and independents sources, furthermore, understanding and, as appropriate, obtaining information on the purpose and intended nature of the business relationship, information related with customer's business and source/utilization of funds and the expected level of activity.
- Prior to establishing relationship with correspondent dealers and agents, appropriate steps must be taken to confirm the identity, integrity and due diligence procedures of those dealers or agents and, where necessary, the identities of underlying clients.

Muhammad Tariq Moti
C.E.O

Muhammad Mustafa Tariq
Director/ Compliance Officer



Muhammad Tariq Moti Securities (Pvt) Limited

BRP # 064, TREC Holder Code 186, TREC Holder / Broker: Pakistan Stock Exchange Limited.

(Formerly: Karachi Stock Exchange Limited), 1st Floor, Room no. 36, Stock Exchange Building, Stock Exchange Road, Karachi.

Phone no. +9221 32421624, 32419415, 32410835, Website: tariqmoti.com.pk, Email id: admin@tariqmoti.com.pk.

- Company shall take reasonable measures to identify and verify identities of beneficial owner (s) in relation to a customer. Furthermore, in case of a legal person, trust or similar legal arrangement, measures shall be taken to understand the ownership and control structure of the legal person or entity.
- Customer's profile must be updated periodically based on risk profiling of the customer. Customer activity must be monitored against a pre-determined profile on on-going basis, paying special attention to higher risk customers or activities, furthermore, to take prompt action when there is material departure from usual and expected activity through regular matching with information already available with company.
- In the case of joint accounts, CDD measures on all of the joint account holders shall be performed as if each of them were individual customers of the bank.

Reporting Procedures

The following core obligations are part of reporting procedures of the company:

- To establish and follow procedures that requires employees to refer promptly any suspicious activity to compliance Officer
- To remain vigilant on unusual or suspicious transaction or other activities that appear not to make good business or economics sense, or activities that appear to be inconsistent with the given profile of the customer, including activities that may be indicative of criminal conduct, terrorism or corruption.
- To act competently and honest while assessing information and circumstance that might give reasonable ground to suspect Money Laundering of Terrorist Financing.

Record Keeping

All records are kept for at least 5 years and contain records obtained through CDD measures; account files and business correspondence; the result of any analysis undertaken; documents relating to business relations and executed transaction; correspondence with the clients and other persons with whom Company keeps a business relation. The five years periods is calculated following the carrying out of the transaction or the end of the business relationship.

Muhammad Tariq Moti
C.E.O

Muhammad Mustafa Tariq
Director/ Compliance Officer



Muhammad Tariq Moti Securities (Pvt) Limited

BRP # 064, TREC Holder Code 186, TREC Holder / Broker: Pakistan Stock Exchange Limited.

(Formerly: Karachi Stock Exchange Limited), 1st Floor, Room no. 36, Stock Exchange Building, Stock Exchange Road, Karachi.

Phone no. +9221 32421624, 32419415, 32410835, Website: tariqmoti.com.pk, Email id: admin@tariqmoti.com.pk.

Training

One of the most important controls over the prevention and detection of money laundering or terrorist financing is to have employees that are alert to the risks of money laundering/terrorist financing and well trained in the identification of mandatory controls transaction and unusual activities or transaction which may prove to be suspicious.

Internet Control and Audit

Compliance with this Policy is monitored through a combination of internet audit, external audit and regulatory reviews in accordance with Applicable AML, Act 2010. The self-assessment of the Anti-Money Laundering internal control in the Company should regulatory take place.

Muhammad Tariq Moti
C.E.O
Muhammad Tariq Moti Securities (Pvt) Ltd

Muhammad Mustafa Tariq
Director/ Compliance Officer
Muhammad Tariq Moti Securities (Pvt) Ltd