

Policy for Inactive Account

A trading account where no transaction have taken place during the last 6 months from the date of last transaction/activity would be termed as "inactive" or "Dormant" trading account.

Procedure to handle Inactive accounts:

All the accounts marked as "INACTIVE" needs to be monitored carefully in order to avoid unauthorized transactions in the account. If the client wants to make the account "ACTIVE" after 6 continuous months or after providing the required documents supporting the financial status, the client needs to submit a request to reactivate his/her account. In case there is any change in the information such as; address, mobile number, email id, Bank/demat account, financial disclosure provided in KYC at the time of registration as client, the same has to be submitted along with the request. After proper verification of the updated / revised details and approval from the compliance officer / or concerned department in-charge of registration of clients, the account can be made "ACTIVE" and transaction can take place.



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40



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CLD MODIFICATION POLICY

In case only to rectify a genuine error in entry of client code at the time of placing / modifying in the related order or said by client to change the code or in case of wrong punching by us we modify the client code. Director of the company Mr. Bajoo Kaval is the only authorized person to change the client code. We take a written approval from the client in such case






RELIC TECHNOLOGIES LIMITED

Anti Money Laundering Policy

To combat money-laundering activities, the Government of India enacted the Prevention of Money Laundering Act, 2002 (hereinafter referred to as the "Act") on January 17, 2003. The basic objective of the Act is three fold, viz.:

- To prevent, combat and control money laundering.
- To confiscate and seize the property obtained from the laundered money.

To deal with any other issue connected with money laundering in India

OUR PREVENTION OF MONEY LAUNDERING POLICY .

The purpose of this policy is to set out the prevention of money laundering commitments and obligations.

This policy is based on the provision of the "Prevention of Money Laundering Act, 2002 and circular issued by SEBI and exchanges thereof".

This internal policy sets out and establishes governing principles, broad guidelines and standards to be adopted by the Companies in order to protect the Companies from being used by any person to launder money.

Policy objectives

- To protect *the Company* from being used for money laundering
- To follow thorough "Know Your Customer" (KYC) policies and procedures in the day-to-day business.
- To take appropriate action, once suspicious activities is detected, and make report to designated authorities in accordance with applicable law / laid down procedures.

To comply with applicable laws as well as norms adopted internationally with reference to Money Laundering

APPLICABILITY

The Prevention of Money Laundering Policy applies to Relic Technologies Ltd. In terms of rules framed under the Act, inter alia, every intermediary shall

Maintain a record of all transactions, the nature and value of which may be prescribed, whether such transactions comprise of single transaction or a series of transactions integrally connected to each other, and where such series of transactions will take place within a month;

Furnish information of transactions referred to in-Clause (a) to the Director within such time as may be prescribed;



Verify and maintain the records of the identity of all its Clients, in such a manner as may be prescribed

As per provision of section 2(n) of the Act, term "Intermediary" means:

" A stock-broker, sub-broker, share transfer agent, banker to an issue, trustee to a trust deed, registrar to an issue, merchant banker, underwriter, portfolio manager, investment adviser and any other intermediary associated with securities market and registered under section 12 of the Securities and Exchange Board of India Act, 1992 (15 of 1992);

Further in terms of rules made under the Act, all intermediaries shall maintain a record of:

All cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency.

All series of cash transactions integrally connected to each other which have been valued below rupees ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month.

All cash transaction where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place.

All suspicious transactions whether or not made in cash.

identity and current address or addresses including permanent address or addresses of the Client, the nature of business of the Client and his financial status; Provided that where it is not possible to verify the identity of the Client at the time of opening an account or executing any transaction, the banking company, financial institution and intermediary, as the case may be, shall verify the identity of the Client within a reasonable time after the account has been opened or the transaction has been executed.

Criteria in relation to defining

It is difficult to define exactly what constitutes suspicious transactions and as such given below is a list of circumstances where transactions may be considered to be suspicious in nature. This list is only inclusive and not exhaustive. Whether a particular transaction is actually suspicious or not will depend on the background, details of the transactions and other facts and circumstances.

Complex /unusually large transactions/ patterns which appear to have no economic purpose.

Client having suspicious background or links with known criminals

Clients whose identity verification seems difficult.

For Example:

- i. False identification documents
- ii. Identification documents which could not be verified within reasonable time
- iii. Non face to face Client
- iv. Doubt over the real beneficiary of the account
- v. Accounts opened with names very close to other established business entities.



Client appears not to co-operate.

Use of different accounts by Client alternatively.

Sudden activity in dormant accounts

Multiple accounts

- vi. Large number of account having a common account holder, authorized signatory with no rationale
- vii. Unexplained transfers between multiple accounts with no rationale

Asset management services for clients where the sources of funds is not clear or not in keeping with the clients' apparent standing/business activity

Substantial increase in business without apparent cause (Unusual activity compared to past transactions)

Activity materially inconsistent with what would be expected from declared business

Inconsistency with clients apparent financial standing

Any account used for circular trading

Unusual transactions by clients of Special Category (SCCs) and business undertaken by shell corporations, offshore banks/financial services, businesses reported to be in the nature of export, import of small items

A transaction which gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime.

A transaction which appears to be a case of insider trading

Transactions reflect likely market manipulations

Suspicious off market transactions

Value of transaction just under the reporting threshold amount in an apparent attempt to avoid reporting

Inconsistency in the payment pattern by the client

Trading activity in account of high risk clients based on their profile, business pattern and industry segment

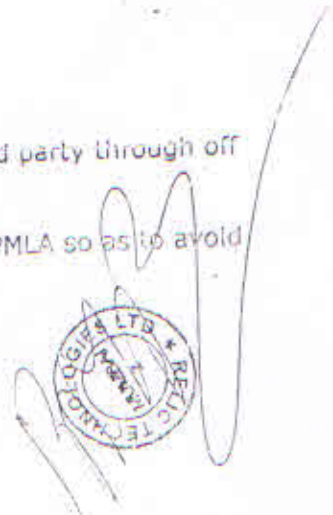
Accounts based as 'passed through'. Where no transfer of ownership of securities or trading is occurred in the account and the account is being used only for funds transfers / layering purposes.

Large deals at prices away from the market

Suspicious off market transactions

Purchases made in one client's account and later on transferred to a third party through off market transactions through DP Accounts.

Multiple transactions of value just below the threshold limit specified in PMLA so as to avoid possible reporting.



❖ Know your Client

Only those new clients would be accepted and allowed to trade with us, who would be referred to us by any of the following:

Employees

Directors:

Relatives or Family Members of the Directors:

Existing Clients (trading in any segment)

On expression of wish for becoming a client by any person, a copy of Client Registration Form along with other documents and forms will be forwarded to the client. The copy of the CRE will also be accompanied with the list of documents and additional documents or proofs required.

Client Registration Form after being signed and filled by the Client will be received at our Client Registration department.

At the client registration department the documents are checked and only after they are found proper they will be counter signed by us. The client code generated will be communicated to the client after completion of entire procedure.

A prospective client will be allowed to trade only on satisfactory submission of required documentary proof and proper signing of documents.



The following procedure should be adopted for identification of Client.

As far as possible, no clients will be registered without personal contact.

In addition to personal contact, for client identification, proper address and identity proof as prescribed by SEBI as per Uniform Documentary Requirement will be obtained from the client.

PAN number and a Copy of PAN card will be compulsorily obtained from the client. No trading will be allowed unless the proof of PAN proof is submitted by the client.

All the documents collected will be verified with original by the Client Registration Department and a stamp "Verified with Original" will be affixed and signed by the person verifying it.

In person verification should be carried out by the staff and stamp should be affixed for in person verification.



❖ Trading Terminal

The Terminal User should be NCFM certified. Before allowing the user to operate the terminal, the copy of NCFM certificate will be collected and verified with the original.

The user will be asked to renew the NCFM certificate on its expiry. If the user fails to renew the certificate then he would not be allowed to operate the same any further. The renewed copy of the certificate will be re-obtained and verified with original.

The guidelines laid down by the Exchange for Approved User and Location of trading terminal will be strictly followed. It would be made sure that there is no issue of trading terminals to unauthorized persons or at unauthorized locations.

The data regarding new user as well as modification in existing user should be immediately uploaded and documented on modification or issue to the new user as the case may be.

Clients Transactions:

Transactions of few major clients would be monitored, if required and in case of any suspicion from our side of possibility of any malfunctioning v the client. If required the client will be asked to stop such kind of malfunctioning or may be even asked to stop trading.

Order Placement

The orders will be placed by the respective Dealer as per the instructions from the clients. However, it should be made sure that the priced out up should not be unrealistic or not representing the correct market price.

Everytime before execution of order a final confirmation of the entire order should be made to the client

The clients should not be induced to either buy or sell.

❖ Others

Complete confidentiality of Client information should be maintained. No client information would be given except if required by law.

Proper records as required by various statues will be maintained.

