

# Anti-Money Laundering (AML) Policy

## 1. Objective

The objective of this AML Policy is to prevent Quanto Consulting Pvt. Ltd. (“the Company”) from being used, intentionally or unintentionally, by criminal elements for money laundering, terrorist financing, or other unlawful financial activities. The Company is committed to complying with all legal and regulatory obligations under the Prevention of Money Laundering Act, 2002 (PMLA) and guidelines issued by the Reserve Bank of India (RBI) and Financial Intelligence Unit – India (FIU-IND).

## 2. Scope

This policy applies to all directors, employees, consultants, and third-party service providers of Quanto Consulting Pvt. Ltd. and governs all customer-facing products and services.

## 3. Regulatory Compliance

Quanto Consulting Pvt. Ltd. shall ensure adherence to:

- The Prevention of Money Laundering Act, 2002
- RBI Master Directions on Know Your Customer (KYC), 2016 (as amended)
- Guidelines issued by FIU-IND
- Action Task Force (FATF) recommendations

## 4. Customer Due Diligence (CDD)

### 4.1 Know Your Customer (KYC)

We follow a Risk-Based Approach (RBA) to KYC:

- Mandatory PAN, Aadhaar (or OVDs), and proof of address
- New Video KYC where permitted
- Verification through CKYC Registry

## 4.2 Enhanced Due Diligence (EDD)

EDD will be performed for high-risk customers, including:

- Politically Exposed Persons (PEPs)
- Non-residents
- High-volume or unusual transaction profiles

## 4.3 Ongoing Due Diligence

Regular monitoring of customer activity to ensure consistency with risk profile and source of funds.

## 5. Objective

- The Real-time and post-transaction monitoring using automated tools
- Identification of suspicious patterns or activities (red flags)
- Action Prompt filing of Suspicious Transaction Reports (STRs) and Cash Transaction Reports (CTRs) with FIU-IND

## 6. Record Keeping

Records of KYC documents, transaction data, and STRs will be retained for at least 5 years after the business relationship has ended or the transaction was conducted, whichever is later.

## 7. Risk Management Framework

- Regular risk assessments based on geography, product, service, transaction volume, and customer profile
- Segmentation of customers into low, medium, and high-risk categories

## 8. Regulatory Compliance

All staff undergo:

- Mandatory AML training at onboarding
- Annual refresher training
- Training includes identification of suspicious activity, compliance obligations, and internal reporting procedures.

## 9. Designation of Compliance Officer

Quanto Consulting Pvt. Ltd. appoints an AML Compliance Officer (AMLCO) responsible for:

- Implementation of the AML policy
- Internal audits and regulatory reporting
- Liaison with regulatory and law enforcement agencies

Name : Dheeraj Parashar

## 10. Internal Control & Audit

- Periodic internal audits of AML compliance
- Immediate escalation and investigation of suspicious activity
- Continuous improvement of AML systems and controls

## 11. Policy Review

This AML Policy will be reviewed annually or when required by changes in law, regulation, or business model.

Approved By: Board Of Directors