



New Peak Securities (Pvt) Ltd
Anti-Money Laundering/Counter Financing of Terrorism
Policy & Procedure

Anti-Money Laundering (AML)

Policy Compliance and Supervisory Procedures

Company's Policy

It is the policy of the Company to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets. Generally, money laundering occurs in three stages. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or traveler's checks, or deposited into accounts at financial institutions. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses. Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will be used later for criminal purposes. All employees of New Peak Securities (Pvt.) Limited are required to receive a copy of the Company's AML policy and are required to follow such policy and procedures. If an employee is caught violating any portion of the Company's AML policies and procedures, a meeting with the AML Compliance Officer will occur, with the employee given written warning of such violation. If the employee violates the AML policies and procedures for the second time, immediate termination will occur.

Objective

The objective of this policy is to ensure that the products and services of the New Peak Securities (Pvt) Ltd. are not used to launder the proceeds of crime and that all of the New Peak Securities (Pvt) Ltd staff are aware of their obligations and the need to remain vigilant in the fight against money laundering / terrorist financing. The document also provides a framework to comply with applicable laws, Regulatory guidelines specially related with detection and reporting of suspicious activities.

Other objectives pursued by this policy are as follows:

- a) Promote a "Know Your Customer" policy as a cornerstone principle for the Brokerage firm's ethics and practices;
- b) Introduce a controlled environment where no business with a Customer is transacted until all essential information concerning the Customer has been obtained;
- c) Conduct self-assessments of compliance with AML policy and procedures;
- d) Introducing to the employees the stages of money laundering process and their individual duties;
- e) Establishing a review process which will be used to identify opportunities that might be used to launder money;

- f) Providing instructions regarding taking appropriate action once a suspicious activity or a money laundering activity is detected or suspected.

Objectives of New Peak Securities (Pvt) Ltd Anti-Money Laundering / Counter

Financing of Terrorism Policy and Procedures

- a) Comply with all AML/CFT Rules & Regulations of the jurisdictions it operates in;
- b) Appointment of a Compliance Officer who shall ensure adherence to the New Peak Securities (Pvt) Ltd AML/CFT Policy and Procedures;
- c) Require all Employees to prevent, detect and report to the Compliance Officer all potential instances in which New Peak Securities (Pvt) Ltd or its employees, its facilities or its activities have been or are about to be used for money laundering, terrorist financing and other illegal activities;
- d) Require all Employees to attend anti-money laundering training sessions, so that all such Employees are aware of their responsibilities under the policies and procedures; and as affected by current developments with respect to anti-money laundering events.

Money Laundering

Money laundering is defined in the Proceeds of Crimes and includes all forms of handling or possessing criminal property, including possessing the proceeds of one's own crime, and facilitating any handling or possession of criminal property. Money laundering involves the placement of illegally obtained money into legitimate financial systems so that monetary proceeds derived from criminal activities are transformed into funds with an apparently legal source.

Money laundering has many destructive consequences both for society as a whole and for those entities involved in money laundering activities. With respect to society as whole, money laundering may provide resources for drug dealers, terrorists and other criminals to operate and expand their criminal activities.

With respect to entities, any involvement whether it be to instigate, assist, conceal, or ignore the source, nature, location, ownership or control of money laundering activities, can lead to both civil and criminal proceedings against both the individual and the entity involved .

Money laundering transactions may include:

- a) Using cash transactions
- b) Money Laundering using bank accounts
- c) Advising a potential or existing client on how to structure a transaction to

- avoid reporting and/or record keeping requirements;
- d) Money Laundering using investment related transactions
 - e) Engaging in any activity while willfully or recklessly disregarding the source of the funds or the nature of the Clients transaction;
 - f) Abnormal transactions
 - g) a number of transactions by the same counter-party in small amounts of the same security, each purchased for cash and then sold in one transaction, the proceeds being credited to an account different from the original account;
 - h) any transaction in which the nature, size or frequency appears unusual, e.g. early termination of packaged products at a loss due to front end loading; early cancellation, especially where cash had been tendered or there fund cheque is to a third party
 - i) Engaging in any activity designed to hide the nature, location, source, ownership or control of proceeds of criminal activity;
 - j) Dealing in funds to facilitate criminal activity; or Dealing in the proceeds of criminal activity.

Money laundering can involve the proceeds of drug dealings, terrorist activities, arms dealings, mail fraud, bank fraud, wire fraud or securities fraud, among other activities.

Terrorist Financing

The financing of terrorism involves providing finance or financial support to individual terrorists or non-state actors. Some countries maintain a list of terrorist organizations and have money laundering laws, which are also used to combat providing finance for those organizations

Terrorist financing refers to the processing of funds to sponsors involved in or those who facilitate terrorist activity. Terrorist individuals/ groups/ organization derive income from a variety of sources, often combining both lawful and unlawful funding, and where the agents involved do not always know the illegitimate end of that income. The forms of such financing can be grouped into two types: Revenue Generating Activities - Income is often derived from criminal activities such as kidnapping, extortion, smuggling or fraud. Income may also be derived from legitimate economic activities such as diamond trading or real estate investment.

Responsibilities of Compliance Officer

Responsibilities of the Compliance Officer include the following:

Review of Account Opening Forms and sign off from Compliance perspective

- 1) Coordination and monitoring of New Peak Securities (Pvt) Ltd day-to-day compliance with applicable Anti-Money Laundering Laws and Regulations and New Peak Securities (Pvt) Ltd own AML/CFT Policy and Procedures;
- 2) Conducting Employee training programs for appropriate personnel related to the New Peak Securities (Pvt) Ltd AML/CFT policy and procedures and maintaining records evidencing such training;
- 3) Receiving and reviewing any reports of suspicious activity from Employees;
- 4) Determining whether any suspicious activity as reported by an Employee warrants

reporting to senior management of the Firm;

5) Coordination of enhanced due diligence procedures regarding Clients; and Responding to both internal and external inquiries regarding New Peak Securities (Pvt) Ltd AML/CFT policy and procedures.

Anti-Money Laundering Employee Training Program

As part of the New Peak Securities (Pvt) Ltd anti-money laundering program, all Employees are expected to be fully aware of the New Peak Securities (Pvt) Ltd AML/CFT policy and procedures.

Each Employee is required to read and comply with this Compliance policy and procedures, address concerns to the Compliance Officer and sign the acknowledgement form confirming that he/she has read and understands New Peak Securities (Pvt) Ltd AML/CFT policy and procedures.

To ensure the continued adherence to New Peak Securities (Pvt) Ltd AML/CFT policy and procedures, all Employees are required to reconfirm their awareness of the contents of this document by signing the acknowledgement form annually, or more frequently, as required by the Compliance Officer.

All Employees are required;

At a time specified by the Compliance officer, to undertake training programs on AML/CFT policy and procedures

To get trained in how to recognize and deal with transactions which may be related to money laundering.

To timely escalate and report the matter to the Compliance Officer.

To get themselves acquainted with Anti Money Laundering Rules & Regulations.

To comply with the requirements of Rules & Regulations

Client Identification Procedures

New Peak Securities (Pvt) Ltd AML/CFT policy and procedures are intended to ensure that, prior to accepting funds from Clients, all reasonable and practical measures are taken to confirm the Clients 'identities.

The Client Identification Procedures should be reviewed in light of the specific characteristics presented by a Client and in any instance the Compliance Officer may determine to apply enhanced measures for reasons other than those discussed in section below. As a reference tool, an Individual Client KYC Checklist is used. Employees are encouraged to provide the Compliance Officer with any revisions they consider appropriate. The Compliance Officer shall retain copies of all documents reviewed or checklists completed in connection with its Client Identification Procedures in accordance with New Peak Securities (Pvt) Ltd Client Records

For Identity and due diligence purposes, at the minimum following information shall be obtained, verified and recorded on KYC/CDD form or account opening form:

- Full name as per Identity document of the Applicant
- Date of Birth, Gender, Marital status, Religion, Occupation, and Qualification
- Residential Status, Nationality, Country of Residence
- Details of Employer/Business
- CNIC/NICOP/SNIC/POC/Passport Number
- Existing Mailing and Permanent address
- Residential Telephone Number, Office Telephone Number, Fax Number, Mobile Number and Email address
- NTN number
- Nature and Type of Account
- Details of Bank Account
- Details of Investor Account maintaining with CDC and Details of Sub Account maintaining with other Broker(s)
- Source of Income, Gross Annual Income, Sources of Fund for Stock Market, Expected value of Investment

Joint Accounts: In case of Joint account, the customer due diligence measures on all of the joint account holders shall be performed as if each of them were individual customers of the New Peak Securities (Pvt) Ltd.

If a customer has authorized another person, than the additional documentation are required. These include:

- Attested copies of ID document of Authorized person
- Power of Attorney duly attested by Notary Public on prescribed format duly signed by all Account Holders with the following minimum information:
 - Name of Authorized person and his/her Relationship
 - CNIC/NICOP/Passport number
 - Contact Details and email address
 - Specimen Signature of the person so authorized

The authorized person is only allow to issue instruction for buy or sale of securities on behalf of client and all payments or receipt of funds must be made to or from the client own accounts and must include CNIC number clearly marked on all payment Cheques.

Identification Procedures for Corporations, Partnerships, and Other Legal Entities

For Identity and due diligence purposes, at the minimum following information shall be obtained, verified and recorded on KYC/CDD form or account opening form:

- Full name as per Identity document
- Company registration /Incorporation number
- Date and country of Incorporation

- Date of Business Commenced
- Residential Status
- Type of Business
- Name of parent Company
- Email, website and contact numbers
- Registered and mailing address
- NTN number and Sales Tax number
- Details of Contact Person and authorized person to operate the account
- Nature and Type of Account
- Details of Bank Account
- Details of Investor Account maintaining with CDC and Details of Sub Account maintaining with other Broker
- Certified true copy of Board Resolution. (Specimen provided as per annexure “ ”) / Power of Attorney*
- Certified true copies of Constitutive Documents of the Applicant (Memorandum &
- Certified copy of list of Directors / Trustee (if applicable)*
- List of authorized signatories.
- List of Nominated persons allowed placing orders.
- Attested copies of C.N.I.C. / N.I.C.O.P / Passports of the Authorized Signatories.
- Attested copies of C.N.I.C. / N.I.C.O.P / Passports of the Contact Person.
- Attested copies of C.N.I.C. / N.I.C.O.P / Passports of the Witnesses.

Customers’ Screening:

In terms of AML/CFT Regulations, it is prohibited to provide services to proscribed individual & entities or to those who are known for their association with such individuals & entities, whether under the proscribed name or with a different name. Accordingly, it is imperative for New Peak Securities (Pvt) Ltd to monitor its relationships on a continuous basis and ensure that no such relationship exists. Further, in case, if any such relationship is found, immediately report the same to Financial Monitoring Unit (FMU) and take any other action, as per law.

In pursuance of above, all customers should be properly screened through UN/OFAC sanctioned lists as available in the data base of the company.

Customers Who Refuse To Provide Information

If a potential or existing client either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, our Company will not open a new account and, after considering the risks involved, consider closing any existing account. The Company will also refuse any account which is determined to be “high risk” by the compliance officer.

Whether or not to accept an account from a high-risk business is determined on a case-by-case basis after taking into account all the facts and circumstances of each case. For example, New Peak Securities (Pvt.) Limited will evaluate such criteria such as the size of the account being

opened, and ATI's familiarity with the client. If a high-risk business account is opened, it will be monitored closely on an on-going basis to determine if any unusual cash movement or trading activity is occurring.

Verifying Information

Based on the risk, and to the extent reasonable and practicable, we will ensure that we have a reasonable belief that we know the true identity of our clients by using risk-based procedures to verify and document the accuracy of the information we get about our clients. In verifying client identity, we will analyze any logical inconsistencies in the information we obtain.

We will verify client identity through documentary evidence, non-documentary evidence, or both. We will use documents to verify customer identity when appropriate documents are available. In light of the increased instances of identity fraud, we will supplement the use of documentary evidence by using the non-documentary means described below whenever possible. We may also use such non- documentary means, after using documentary evidence, if we are still uncertain about whether we know the true identity of the customer. We will provide notice to the customer that we are requesting additional information to verify the customer's identity. We will not open a client account if we cannot form a reasonable belief of the client's true identity. If the client's identity cannot be proven, a SAR will be filed if warranted by the compliance officer.

Appropriate documents for verifying the identity of natural persons include the following: An unexpired driver's license, passport, or other government identification showing nationality, residence, and photograph or other biometric safeguard, an unexpired alien registration card or other government issued identification showing nationality, residence and photograph or other biometric safeguard.

Timing of Verification

Verification of the identity of the customers shall be completed before business relations are established including verification of Universal Identification Number (UIN) from National clearing company of Pakistan limited (NCCPL) database.

Monitoring Accounts For Suspicious Activity

We will manually monitor a sufficient amount of account activity to permit identification of patterns of unusual size, volume, pattern or type of transactions, geographic factors such as whether jurisdictions designated as "non cooperative" are involved, or any of the "red flags" identified below. We will look at transactions, including deposits and wire transfers, in the context of other account activity to determine if a transaction lacks financial sense or is suspicious because it is an unusual transaction for that customer. The AML Compliance Officer or his or her designee will be responsible for this monitoring, will document when and how it is carried out, and will report suspicious activities to the appropriate authorities.

Red Flags

Red flags that signal possible money laundering or terrorist financing include, but are not limited to:

- The client exhibits unusual concern about the Company's compliance with government reporting requirements and the Company's AML policies, particularly on his or her identity, type of business and assets, or is reluctant, or refuses to reveal any information concerning business activities, or furnishes unusual or suspect identification or business documents.
- The client wishes to engage in transactions that lack business sense or apparent investment strategy, or are inconsistent with the client's stated business or investment strategy.
- The information provided by the client that identifies a legitimate source for funds is false, misleading, or substantially incorrect.
- Upon request, the client refuses to identify or fails to indicate any legitimate source for his or her funds and other assets.
- The client (or a person publicly associated with the client) has a questionable background, or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- The client exhibits a lack of concern regarding risks of the investment.
- The client appears to be acting as an agent for an undisclosed principal, but declines, or is reluctant, without legitimate commercial reasons, to provide information or is otherwise evasive regarding that person or entity. The client has difficulty describing the nature of his or her business or lacks general knowledge of his or her industry.
- The client attempts to make frequent or large deposits of currency, or asks for exemptions from the Company's policies relating to the deposit of cash and cash equivalents.
- For no apparent reason, the client has multiple accounts under a single name or multiple names, with a large number of inter-account or third party transfers.
- The client is from, or has accounts in, a country identified as a non-cooperative country.
- The client's account shows numerous currency or cashier's check transactions aggregating to significant sums.
- The client's account has wire transfers that have no apparent business purpose to or from a country identified as money laundering risk or a bank secrecy haven.
- The client's account indicates large or frequent wire transfers, immediately withdrawn by check or debit card without any apparent business purpose.
- The client makes a funds deposit followed by an immediate request that the money be wired or transferred to a third party, or to another Company, without any apparent business purpose.
- The client makes a funds deposit for purchasing a long-term investment followed shortly thereafter by a request to liquidate the position and transfer of the proceeds out of the account.
- The client engages in excessive journal entries between unrelated accounts without any apparent business purpose.
- The client requests that a transaction be processed to avoid the Company's normal documentation requirements.
- The client maintains multiple accounts, or maintains accounts in the names of family members or corporate entities, for no apparent purpose.

- The client's account has inflows of funds or other assets well beyond the known income or resources of the customer.
- Responding to Red Flags and Suspicious Activity

When a member of the Company detects any red flag he or she will investigate further under the direction of the AML

Compliance Officer. This may include gathering additional information internally or from third party sources, contacting the government, freezing the account.

Risk Profiling Of Customers

All relationships shall be categorized with respect to their risk levels i.e. High, Medium and Low based on the risk profiling of customer (through KYC/CDD application and as guided in the operational Manual for making effective decision whether to perform Simplified Due Diligence (SDD) or Enhanced Due Diligence (EDD) both at the time of opening and ongoing monitoring of business relationship.

The approval for opening of PEP and Non-Governmental Organizations (NGOs)/Not-for-Profit Organizations (NPOs) and Charities account will be obtained from Senior Management (Business Head) after performing EDD. Further Personal accounts will not be allowed to be used for charity purposes/collection of donations. Customer KYC / CDD profile will be reviewed and/or updated on the basis of predefined frequency, in accordance with the risk profile of the customer, as per procedure defined in operational Manual.

- High Risk every after one month
- Medium Risk every after one month
- Low Risk after one month

In case of any material change in the relationship or deviation from customer profile, CDD will be conducted and customer profile will be updated immediately without lapse of above defined period.

High-Risk Clients

The Compliance Officer will provide and will continuously update a list of the types of Clients that New Peak Securities (Pvt) Ltd considers to be of 'high risk,' such that enhanced due diligence procedures are warranted compared to the routine Client Identification Procedures.

Following are the examples of Clients who pose a high money laundering risk:

1. Non-resident customers;
2. Legal persons or arrangements including non-governmental organizations; (NGOs)/not-for-profit organizations (NPOs) and trusts / charities;
3. Customers belonging to countries where CDD/KYC and antimoney laundering regulations are lax or if funds originate or go to those countries;
4. Customers whose business or activities present a higher risk of money laundering such as cash based business;

5. High net worth customers with no clearly identifiable source of income;
6. There is reason to believe that the customer has been refused brokerage services by another brokerage house;
7. Non-face-to face / on-line customers;
8. Establishing business relationship or transactions with counterparts from or in countries not sufficiently applying FATF recommendations; and
9. Politically Exposed Persons (PEPs) or customers holding public or high profile positions.

Politically Exposed Persons (PEPs)

These generally include individuals in prominent positions such as senior politicians, senior government, judicial or military officials; senior executives of State Corporations and their family members and close associates. These individuals present reputational risk and potential conflict of interest and extra caution is required when opening their brokerage account and monitoring their account activity. The above definition is not intended to cover middle ranking / junior officials in above noted categories. However, prudence requires brokers to be careful while dealing with such customers

Beneficial Ownership of Legal Persons and Legal Arrangements:

The BROKER shall identify and verify the identity of the customer, and understand the nature of its business, and its ownership and control structure.

The purpose of the requirements set out regarding the identification and verification of the applicant and the beneficial owner is twofold:

- First, to prevent the unlawful use of legal persons and arrangements, by gaining a sufficient understanding of the applicant to be able to properly assess the potential ML/TF risks associated with the business relationship; and
- Second, to take appropriate steps to mitigate the risks.

If NPSL has any reason to believe that an applicant has been refused facilities by another BROKER due to concerns over illicit activities of the customer, it should consider classifying that applicant:

As higher-risk and apply enhanced due diligence procedures to the customer and the relationship;

- Filing an STR; and/or
- Not accepting the customer in accordance with its own risk assessments and procedures.

The NPSL shall accept copies of the documents for identifying a Customer verified by seeing originals during establishing business relationship.

Enhanced Client Identification Procedures for 'High-Risk' Natural Persons

Enhanced Client Identification Procedures for 'high risk' natural persons as Clients include, but are not limited to, the following:

- 1) Assessing the Client's business reputation through review of financial or professional references, generally available media reports or by other means;
- 2) Considering the source of the Client's wealth: including the economic activities that generated the Client's wealth, and the source of the particular funds intended to be used to make the investment;
- 3) Reviewing generally available public information, such as media reports, to determine whether the Client has been the subject of any criminal or civil enforcement action based on violations of anti-money laundering laws or regulations or any investigation, indictment, conviction or civil enforcement action relating to financing of terrorists; Conducting a face-to-face meeting with the Client to discuss/confirm the account opening documents.
- 4) The enhanced due diligence procedures undertaken with respect to 'high risk' Clients must be thoroughly documented in writing, and any questions or concerns with regard to a 'high risk' Clients should be directed to the Compliance Officer.

Enhanced Client Identification Procedures for 'High-Risk' Corporations, Partnerships, Trusts and Other legal Entities

Enhanced Client Identification Procedures for 'high risk' corporations, partnerships and other legal entities include, but are not limited to, the following:

- 1) Assessing the Client's business reputation through review of financial or professional references, generally available media reports or by other means;
- 2) Reviewing recent changes in the ownership or senior management of the Client;
- 3) Conducting a visit to the Client's place of business and conducting a face-to-face meeting with the Client to discuss/confirm the account application, the purpose of the account and the source of assets;
- 4) Reviewing generally available public information to determine whether the Client has been the subject of any criminal or civil enforcement action based on violations of anti-money laundering laws or regulations or any criminal investigation, indictment, conviction or civil enforcement action relating to financing of terrorists.

Simplified Due Diligence (SDD)

There might be circumstances where the risk of money laundering or financing of terrorism may be low as information on the identity of the customer and the beneficial ownership is publicly available and/or the turnover in the account is meager. In such circumstances, and provided there has been an adequate analysis of the risk, following SDD measures will be applied.

SDD measures shall include:

- Decreasing the frequency of customer identification updates;
- Reducing the degree of on-going monitoring and scrutinizing transactions based on a reasonable monetary threshold; and
- Not collecting specific information or carrying out specific measures to understand the purpose and intended nature of the business relationship, but intended purpose and nature of account may be ascertained from the relationship established or from the type of transactions.

SDD measures should not be considered in following situations:

- When there is a suspicion of money laundering or financing of terrorism;
- There are no exceptions in reporting suspicion to FMU within the provisions of AML Act.

Reliance on Third Parties

Regulated person may rely on a third party to conduct CDD on its behalf provided that the regulated person shall;

- (a) obtain immediately, the necessary information relating to identification of the customer, identification of the beneficial owner and/or the nature of business of the customer;
- (b) take steps to satisfy itself that copies of identification data and other relevant documentation relating to CDD requirements will be made available from the third party upon request without delay;
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- (c) satisfy itself that the third party is regulated, and supervised or monitored for, and has measures in place for compliance with, CDD and record-keeping requirements in line with these regulations; and
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- (d) maintain data/ information confidentiality and non-disclosure agreement with the third party.
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When determining in which countries the third party that meets the conditions can be based, regulated person should have regard to information available on the level of country risk.

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For regulated person that rely on a third party that is part of the same financial group:

- (a) the group should apply CDD and record-keeping requirements and programs against money laundering and terrorist financing, in accordance with these regulations; and
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- (b) any higher country risk should be adequately mitigated by the group's AML/CFT policies.
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- (c) the implementation of those CDD and record-keeping requirements and AML/CFT programs shall be supervised at a group level by a competent authority.
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The regulated person shall be responsible for ongoing monitoring of its customers and notwithstanding the reliance upon a third party, the regulated person shall ultimately remain responsible for its AML/CFT obligations, including generating STRs and shall carry out ongoing monitoring of such customer itself.

General Reporting Procedures

- 1) The Compliance Officer on behalf of the organization is nominated to receive disclosures under this regulation.
- 2) Anyone in the organization, to whom information comes in the course of the relevant business as a result of which he suspects that a person is engaged in money laundering, must disclose it to the Compliance Officer;
- 3) Where a disclosure is made to the Compliance Officer, the officer must consider it in the light of any relevant information which is available to NEW PEAK SECURITIES (PVT) LTD and determine whether it gives rise to suspicion: and Where the Compliance Officer determines in consultation with the Senior Management, the information must be disclosed to the Regulatory Authority after obtaining an independent legal advice.

Program to Test AML Program

The Company will hire an independent, qualified party to provide an annual independent audit of our AML policies and procedures, and the compliance with said procedures. The Company will perform written follow-up to insure that any deficiencies noted during its annual review are addressed and corrected.

The Company will confirm with its AML audit firm that their audit program includes the following:

1. Audit objectives and scope of the exam;
2. Any recommendations on improving the AML program;
3. A discussion of any noted deficiencies and an action plan to be implemented by management to address these deficiencies; and
4. An overall opinion of the adequacy of the Company's AML program

A report of the independent review shall be addressed to senior management with a copy being maintained by the Company's AML Compliance Officer.

Recognizing & Reporting of STRs (Suspicious Transactions)

STRs include detailed information about transactions that are or appear to be suspicious in terms of AML Act 2010. NEW PEAK SECURITIES (PVT) LTD shall comply with the provisions of AML Act, rules and regulations issued there under for reporting of suspicious transactions in the context of money laundering or financing of terrorism.

In pursuance to the above, the compliance officer should review and monitor the transactions of customer's accounts on an ongoing basis in accordance to the policy.

While reviewing transactions, the compliance officer should pay special attention to all

complex, unusually large transactions, and all unusual patterns of transactions, which have no apparent economic or visible lawful purpose.

The transactions, which are out of character or inconsistent with the history, pattern, or normal operation of the account including through heavy deposits, withdrawals and transfers, etc. should be viewed with the suspicion, and be properly investigated.

If Compliance officer decides to report any transaction/ account to the FMU as “Suspicious” based on the justifiable grounds, the same should be reported to FMU under intimation to the CEO/ Chairman of the board.

All the employees of NEW PEAK SECURITIES (PVT) LTD are strictly prohibited to disclose the fact to the customer or any other quarter that a suspicious transaction or related information is being or has been reported to any authority, except if required by law.

Monitoring Employees, Employee Conduct, and Accounts

The Company’s compliance officer will conduct a background check, including a check of any criminal records, on all new employees hired by the firm. Any suspicious or questionable background information will be discussed with the Company’s managing director prior to making any final employment decision.

If employees have trading accounts, we will subject employee accounts to the same AML procedures as client accounts, under the supervision of the AML Compliance Officer