



Investor Education - Prevention of Money Laundering

1. Prevention of Money Laundering Act, 2002 (PMLA) is enacted to prevent the financing of terrorism and to prevent laundering of money.
2. It is an obligation of individual/entities to whom PMLA is applicable, to report certain kind of transactions routed through them to Financial Intelligence Unit (FIU), government of India.
3. PMLA is, inter-alia, applicable to various SEBI regulated intermediaries which includes merchant bankers, portfolio managers, alternative investment funds, depository participants, investment advisors, stock-brokers, etc.
4. LGT Wealth India Private Limited ("the Company") is registered as a Portfolio Manager with SEBI (Registered Intermediary).
5. Regulatory authorities have issued circulars wherein intermediaries are instructed to adopt written procedures to implement the anti- money laundering provisions specifically covering the following three parameters which are related to the overall 'Client Due Diligence Process':
 - a. Policy for acceptance of clients
 - b. Procedure for identifying the clients
 - c. Transaction monitoring and reporting Suspicious Transactions Reporting (STR)
6. In this connection, the Company has adopted the Anti-Money Laundering Policy ("AML Policy").
7. As per the Policy, the Company has put in place system for complying with the PMLA requirements. The Company would do an extensive due diligence for certain categories of clients like High net-worth clients, unusual transactions by Clients of Special Categories like Politically Exposed Persons, Trust, Charities, Non-Governmental Organizations (NGOs) and organizations receiving donations and such other clients as covered in the policy.
8. While opening new accounts, all the prescribed procedures of KYC, Client Identifications and Client Due Diligence would need to be strictly followed in the context of ensuring the compliance under PMLA by the Company and clients are requested to co-operate for the same.
9. Further, all the record of transaction(s) and client identifications would need to be preserved by the Company in a manner which can be retrieved promptly and reported to the authorities in the specified format as and when required.
10. Clients are advised to be fully conversant with the provisions of PMLA and any amendments thereto from time to time and to co-operate with the Company by providing the additional information(s)/document(s), if requested, to ensure the compliance requirements under PMLA.
11. Clients are advised to be vigilant and to refrain from temptation of easy monetary gains, by knowingly or unknowingly supporting the people who are involved in the activities which are endangering freedom and causing damage to the nation. Clients are supposed to provide their active co-operation in the due compliance of the law.

Please visit the website of FIU (www.fiuindia.gov.in), SEBI (www.sebi.gov.in) for any further information on the subject.



Client's Obligations:

We endeavor to give our clients a crime-free AML-compliant ecosystem and a cordial and healthy business relationship. But for this, we need your co-operation too. Here is an illustrative (not exhaustive) list of your obligations towards helping us comply with the regulations:

- a. You shall be required to provide details / information as may be required from time to time.
- b. Provide valid documents to prove your identity and address.
- c. Provide your accurate information including mobile No, email id, your occupation and its nature; for eg; if you are carrying on a business, you should be informing us not only the name of your business but also the nature as well as product-line of your business.
- d. Provide accurate information about your financials. For eg; provide updated information regarding your annual income, networth etc.
- e. Co-operate with us when we seek additional information or documents in connection with your trades, holdings etc.
- f. Let us know the real rationale / purpose for certain transactions or trades undertaken by you when we make enquiries.
- g. Immediately inform us as and when there is a change in the information that you have provided along with supporting documents wherever required. Please do this proactively.
- h. Update your KYC information with us or co-operate with us when we remind you that a KYC updation is due from your end.
- i. Implementation of AML/CFT measures at times may require us to demand certain information from clients, which may be of personal nature or has hitherto never been called for or which are beyond the standard checklists. Such information can include documents evidencing source of funds/income tax returns/bank records, salary slips, explanation on certain transactions, details of relatives or of family or of known transferees of funds or securities, etc. Please provide such information when called for.
- j. If you have any suspicion regarding the authenticity of the request or the authenticity of the person seeking such information from you, you may alert the Compliance Officer by writing to compliance@lgtindia.in

We solicit your active co-operation to provide any other additional information / documents. This will help us to comply with our regulatory obligations.
