



Anti Money Laundering Policy

Dated

September 30, 2025

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AML POLICY -2025	October 01, 2025	Inclusion of reference to NBFC provisions to be in line with NBFC policy.	AML-2024

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I. POLICY STATEMENT AND PURPOSE

1. SMAS Auto Leasing India Private Limited (“**SMAS**”) is committed to comply fully with all applicable Anti-Money Laundering (“**AML**”) laws in the conduct of its businesses. Towards this objective, we must conduct business only with reputed customers who are involved in legitimate business activities and whose funds are derived from legitimate sources. Appropriate measures must be set up to ensure that we do not, even inadvertently, accept forms of payment that are known or suspected to be means of laundering money. One such measure is in implementing risk-based “Know-Your-Customer” (“**KYC**”) due diligence procedures calibrated to the risk in question, as well as systemic ‘Red Flags’ to detect unacceptable or suspicious forms of payment. SMAS’s employees acknowledge that failing to detect customer relationships and transactions that place SMAS brand at risk, could cause irreparable harm to SMAS’s reputation, leading to significant financial loss and severe penalties under applicable law.
2. This policy is framed having regard to the Prevention of Money Laundering Act, 2002 (“**PMLA**”) and rules thereunder (“**PML Rules**”), and the principles underlying anti-money laundering and counter-terrorist financing frameworks generally adopted in India. It is expressly clarified that the AML / KYC directions issued by the Reserve Bank of India (“**RBI**”), including those applicable to banks and Non-Banking Financial Companies (“**NBFCs**”), apply only to entities regulated by the RBI. SMAS is not an NBFC and is not regulated by the RBI. Accordingly, such RBI-issued AML / KYC directions are not mandatorily applicable to SMAS.
3. References in this policy to concepts such as customer due diligence, beneficial ownership identification, ongoing monitoring and escalation mechanisms are adopted by SMAS voluntarily as internal risk-management and governance measures, and shall not be construed as statutory obligations applicable to SMAS.
4. Nothing contained in this policy shall be construed as: (a) an admission that SMAS is a “reporting entity” under the PMLA; or (b) a voluntary submission by SMAS to regulatory regimes applicable to banks or NBFCs; or (c) creating obligations exceeding those imposed under applicable law. This policy is intended to evidence SMAS’s commitment to ethical conduct, risk awareness and responsible business practices.
5. As an effort in the said direction SMAS has prepared this Anti-Money Laundering Policy (“**AML Policy**”) in order to ensure compliance under the PMLA and to prevent any involvement by SMAS in any money laundering activity even inadvertently, it requires the directors, officers, employees and those who work with SMAS to recognize questionable financial transactions, and to take steps to conduct appropriate additional due diligence in addition to the basic due diligence as may be required as per the normal policy and procedure of SMAS. If any ‘Red Flag’, whether or not listed in this AML Policy is triggered, the **Designated Persons** (as defined below) need to promptly contact SMAS’s **Compliance Officer** (as defined below) to facilitate any further due diligence/additional due diligence or action that may be needed. SMAS is also committed to cooperate with law enforcement and regulatory agencies enforcing anti-money laundering laws and regulations.

6. AML Policy constitutes a minimum standard. It must be complied with in any country in which SMAS does business even when the policy is stricter than the anti-money laundering laws that are applicable in that country, including both applicable local laws and those laws with extra-territorial application. However, when applicable anti-money laundering laws are stricter than this AML Policy, such laws must be complied with. In case of any doubts, Designated Persons must contact SMAS's Compliance Officer.
7. The guidelines in this AML Policy supplement the SMAS's Code of Conduct and should be read in conjunction with:
 - a. The Whistleblower Policy;
 - b. The Anti-Bribery and Anti-Corruption Policy;
 - c. Any guidance published pursuant to this AML Policy;
 - d. Any other relevant policies as may be implemented from time to time.
8. Because no code of conduct or policy can cover every possible situation, SMAS relies on the Designated Persons to use good judgment and to speak up when they have either questions or concerns.

II. SCOPE AND APPLICABILITY

SMAS may maintain a documented, Board-approved internal policy setting out its approach to customer identification, counter-party due diligence, transaction vigilance and internal escalation, commensurate with the nature, scale and risk profile of its business.

Any reference to reporting to the Financial Intelligence Unit – India (“**FIU-IND**”) in this AML Policy shall be read as applicable only where such reporting is mandated under applicable law, and not as a general statutory obligation applicable to SMAS.

This AML Policy is applicable to SMAS as well as anyone associated and dealing with SMAS. This AML Policy shall be communicated to all dealing with SMAS and can also be obtained from the website of SMAS. The following policy has been established to ensure that all employees know the identity of their customers and take appropriate steps to verify the information received by them in order to combat money laundering.

This AML Policy is applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with SMAS and such other persons including those designated by the Compliance Officer from time to time (all of the aforesaid being collectively referred to as “**Designated Persons**”).

III. COMPLIANCE OFFICER AND DESIGNATED DIRECTOR

For the purposes of this Policy, “**Compliance Officer**” means an internal officer appointed by

SMAS to oversee implementation of this Policy, act as a point of internal escalation, and coordinate responses to any suspected money-laundering concerns. This role is an internal governance function and not a statutory appointment under the RBI or the PMLA.

1. SMAS shall appoint, a management-level employee of sufficient seniority, competence and independence to act as the Compliance Officer for the purposes of the PMLA and PML Rules, who shall also discharge the functions of the Compliance Officer under this AML Policy, unless the board of directors (“**Board**”) resolves to designate separate individuals for these roles. The Compliance Officer so appointed shall be notified to all Designated Persons and details thereof recorded in Appendix II. Any regulatory communication, if required, shall be undertaken strictly in accordance with applicable law.
2. Compliance Officer is responsible for ensuring compliance, monitoring transactions, and sharing and reporting information as required under the applicable law / regulations.
3. All queries, concerns or complaints dealing with money laundering shall be reported to the Compliance Officer by the Designated Persons. Any action required to be undertaken under this AML Policy shall be taken by the Compliance Officer in accordance with this AML Policy. The Compliance Officer shall have a functional reporting to the Designated Director. The designated Director has been prescribed in Appendix-II of this AML Policy. The compliance shall submit annual compliance reports at the end of financial year (March) to the Designated Director. Aggravated cases of breach of this AML Policy shall be escalated to the Board through the Designated Director.

IV. GUIDANCE ON MONEY LAUNDERING

1. The phrase “money laundering” is generally understood to mean any act or an attempted act, directly or indirectly, to conceal, possess, acquire, use, project as untainted property, claiming an untainted property or disguise the true origin and ownership of proceeds of crime or illegally obtained proceeds so that they appear to have originated from legitimate sources to avoid prosecution, conviction and confiscation of the illegal proceeds. Money laundering can be used by terrorist organizations, tax evaders, smugglers, by those engaged in bribery, or anyone who receives money for illegal activities or through illegal means. Countering money laundering is of critical importance as it ensures that illegal funds do not remain hidden and do not get integrated and merged into legitimate business and consequently into the economy.
2. The Government of India has enacted the PMLA for preventing money laundering and connected activities, confiscation of proceeds of crime, setting up of agencies and mechanism for coordinating measures for combating money laundering etc. with effect from July 1, 2005. Section 3 of the PMLA defines the offence of money laundering as “Whosoever directly or indirectly attempts to indulge or knowingly assists or knowingly is a party or is actually involved in any process or activity connected with the proceeds of crime and projecting it as untainted property shall be guilty of offence of money laundering. Including directly or indirectly attempting to indulge or knowingly assisted or knowingly is a party or is actually involved in one or more process or activities connected with the proceed of crime, namely, concealment, possession, acquisition, use, projecting as untainted property or claiming as untainted property in

any whatsoever."

3. The term ‘proceeds of crime’ has been defined under Section 2(u) of the PMLA as “any property derived or obtained, directly or indirectly, by any person as a result of criminal activity relating to a scheduled offence or the value of any such property.” The definition of ‘proceeds of crime’ also implies that assets can be tainted by conversion. Therefore, if the ‘proceeds of crime’ are utilized to purchase another asset, by conversion, that asset could also be considered to be a ‘proceed of crime’ replacing the tainted money. Under the provisions of the PMLA, proceeds of crime can be attached in the possession of any person, whether or not such person was involved in the offence of money laundering.
4. Money laundering usually consists of 3 (three) steps:
 - a. Placement: This is the initial stage and during this stage, the money generated from illegal/criminal activity such as sale of drugs, illegal firearms, etc. is disposed of. Funds are deposited into financial institutions or converted into negotiable instruments such as money orders or traveler’s Cheques. For example, cash received by a drug smuggler can be taken to a bank and changed into a money order or traveler’s cheque.
 - b. Layering: The layering stage involves separation of proceeds from their illegal source by using multiple complex financial transactions to disguise from the audit trail and hide the proceeds. Thus, a trail of unusually complex transactions is created to disguise the original source of funds and thereby make it appear legitimate. For example, money can be moved into and out of various offshore bank accounts through electronic fund transfers.
 - c. Integration: Once the illegitimate money is successfully integrated into the financial system, these illicit funds are reintroduced into the economy and financial system and often used to purchase legitimate assets, fund legitimate businesses, or may be conduct another criminal activity. The transactions are made in such a manner so as to appear as being made out of legitimate funds.
5. Money laundering is a global problem, and many countries, and organizations have enacted laws to combat it. Compliance with AML and anti-terrorism laws and regulations requires an awareness of possible ‘Red Flags’ or suspicious activities, which may arise in the course of conducting business. When ‘Red Flags’ are identified, an appropriate level of additional due diligence must be performed and additional approvals should be obtained.

V. POTENTIAL RED FLAGS

1. While an exhaustive list cannot be provided, set out below are indicative actions or situations or parties that Designated Persons should be careful about however they should scale their decisions, by amongst others, taking into account concerns - which when appearing together or individually should raise ‘Red flag’ concerns (each, whether or not listed herein, a “**Red Flag**”):
 - a. Customers or suppliers who are connected to countries identified as non-cooperative by the ‘Financial Action Task Force on Money Laundering’ established by the G-7 Summit in 1987,

and international organization against money laundering;

- b. Customers or suppliers who are reluctant to provide complete information and/or provide insufficient, false, or suspicious information or who are unwilling to comply with SMAS's KYC norms as may be in force from time to time;
- c. Customers or suppliers who appear to be acting as an agent for another company or individual, but decline or are reluctant to provide information regarding that company or individual;
- d. Customers or suppliers who express concern about, or want to avoid, reporting or record-keeping requirements;
- e. Payments of amounts in excess of Rs.20,000/- (Rupees Twenty Thousand) only made in cash or cash equivalents, such as money orders, traveler's cheques, internet currencies or prepaid cash cards. Acceptance of such amounts of cash or cash equivalents as a form of payment by SMAS is strongly discouraged. Cash payments are commonly used by money launderers, and leave very little in the way of audit trails. Alternative methods of payment which provide a stronger audit trail should be offered. Particular care should be taken with regard to customers and suppliers who structure these payments to avoid the relevant government reporting requirements for cash and cash equivalent payments (for example by making multiple smaller payments or payments from multiple sources);
- f. The purchase of products, or a larger volume purchase, that appears to be inconsistent with a customer's normal ordering pattern, and in the absence of any legitimate business reason such as a special price promotion;
- g. Complex deal structures or payment patterns that reflect no real business purpose or economic sense;
- h. Requests for payment to be made through an unrelated country or to an unrelated third party;
- i. Multiple partial payments from various parties on behalf of a single customer and/or multiple partial payments from various locations. Also included are "double endorsed" or "third party" cheques, where a customer endorses over to a company as payment for their invoice a cheque that was originally made out to the customer;
- j. Customers or suppliers whose address is not a physical site;
- k. Customers making a funds deposit followed by an immediate request that the money be wired out or transferred to a third party, or to another firm, without any apparent business purpose;
- l. Customers paying in one form of payment and then requesting a refund of the payment in another form e.g. paying by credit card and requesting a wire transfer or cash refund.

VI. CUSTOMER DUE DILIGENCE (KYC), ONGOING MONITORING AND RECORD-KEEPING:

SMAS may undertake customer and counter-party due diligence (“**CDD**”) using a risk-based approach adopted as a matter of internal control and commercial prudence. No account or business relationship shall be opened or continued where SMAS is unable to satisfy relevant CDD requirements.

1. Customer Acceptance Policy: SMAS shall formulate and implement a customer acceptance policy ensuring that prospective customers are accepted only after proper identification, verification and risk assessment. SMAS shall not enter into any business relationship with customers unable to provide satisfactory KYC documentation or where there is suspicion of money laundering or terrorist financing.
2. Customer Identification and Verification: Each Designated Person shall: (a) identify the Customer information may be refreshed periodically based on transaction patterns, changes in risk profile, or internal review requirements, as determined appropriate by SMAS; (b) conduct background verifications, integrity assessments and due diligence on customers and persons on whose behalf transactions are conducted; and (c) be familiar with customers’ business practices. In case of agents or intermediaries, verify the principal-agent relationship and retain supporting documents.
3. Identification of Beneficial Ownership: Where the customer is a legal person, trust, partnership or other arrangement, SMAS shall identify and verify the beneficial owner(s) holding more than the threshold ownership or control interest (as prescribed under the PML Rules), including natural persons exercising ultimate effective control (as further explained in **Annexure 1** and **Annexure 2**).
4. Risk Categorisation and Enhanced Due Diligence: Depending on their background, type of business, relationships and transactions different customers shall be categorised as low-risk, medium-risk or high-risk based on factors including customer profile, nature of business relationship, transaction profile, geography and delivery channel. Enhanced due diligence shall be applied to high-risk customers, politically exposed persons (domestic or foreign), non-face-to-face relationships and other categories specified by RBI. Clients falling in lower risk category will be onboarded subject to completion of the regular client due diligence process. Clients falling within high or medium risk categories, may be onboarded with additional CDD measures and internal approvals. Upon the successful completion the additional CDD measures, the Client can be moved to a lower risk category. The Company, at its sole discretion may also refuse to onboard any client. In the event of any change in risk profile, the Company may seek additional information /documents and upon the receipt of the same, the Client can be moved to a lower risk category.
5. Ongoing Due Diligence and Periodic KYC Updation: Designated Persons shall observe, monitor and record all transactions and relationships on an ongoing basis for consistency with customer profile and risk category. Customer information may be refreshed periodically based on transaction patterns, changes in risk profile, or internal review requirements, as determined appropriate by SMAS.
6. Record-Keeping: All KYC records, account files, business correspondence, transaction records and reports filed with FIU-IND (*as applicable*) shall be maintained for a minimum period of five (5) years after the business relationship is terminated or the transaction date (or longer if required by law

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or SMAS policy), in a manner enabling reconstruction of individual transactions to provide evidence of due diligence.

7. Each Designated Person has an obligation under this AML Policy to immediately and, without delay, report to the Compliance Officer any **Suspicious Transaction** (as defined below) or suspicious activity or 'Red Flag' concern ("**Report**"). Each Designated Person shall be aware of and follow country legal requirements for the reporting of cash transactions.

A "**Suspicious Transaction**" includes an attempted transaction, whether or not made in cash, which to a person acting in good faith:

- a. gives rise to a reasonable ground of suspicion that it may involve the proceeds of an offence specified in the schedule to the PMLA, annexed herewith as Appendix I, regardless of the value involved; or
- b. appears to be made in circumstances of unusual or unjustified complexity; or
- c. appears to have no economic rationale or bona-fide purpose; or
- d. gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism or other forms of criminal activity.

8. Reporting/action by the Compliance Officer: When setting up internal procedures, the Compliance Officer may adopt a 'risk-based approach' to KYC and AML compliances. Consequently, there will be circumstances when it will be both necessary and permissible to apply commercial judgment to a Report received by the Compliance Officer. Based on the facts and circumstances of an incident covered in a Report, the Compliance Officer shall take one or more steps, such as (a) probe into the incident himself/herself, (b) set up an internal enquiry into the incident, (c) in case of Aggravated Cases determine and recommend whether a reporting of the incident should be made to the appropriate authority. (Aggravated Cases shall mean incidents of AML that need to be reported to relevant regulatory or enforcement authorities. Any external reporting to law enforcement or regulatory authorities shall be undertaken only where legally required and after appropriate internal and legal review. All Aggravated Cases must be escalated, without delay, by the Designated Director to the Board).
9. Cooperate fully for enforcing anti-money laundering laws: The Compliance Officer shall be SMAS's point of contact for coordinating with all law enforcement and regulatory agencies for all compliance reporting and investigations. Designated Persons shall render full support to the Compliance Officers well as cooperate fully with any internal investigation team set up by the Compliance Officer or the Designated Director or the Board, or with any external investigation.

VII. VIOLATIONS:

Any violation of the PMLA shall amount to violation of the AML Policy. Over and above the same, any violation of the AML Policy may also amount to violation of the AML Policy, subject to verification by the Compliance Officer and include the following actions by Designated Persons.

The said list is merely an exhaustive list and shall not be limited to the said acts.

1. Any violation of the compliance steps under this AML Policy by a Designated Person;
2. On-boarding a customer, supplier, contractor, agent, or investor without confirming the identity.;
3. Requesting others to violate the AML Policy;
4. Failure to promptly raise a known or suspected violation of the AML Policy or notify a potential 'Red Flag' or Suspicious Transaction;
5. Failure to cooperate in investigations of possible AML Policy violations;
6. Retaliation against another employee for reporting a concern under the AML Policy;
7. Failure to demonstrate leadership, initiative, and diligence to ensure compliance with the AML Policy, PMLA and other applicable laws;
8. Involvement in any form of money laundering activities, whether in the course of employment with SMAS or otherwise.

VIII. CONSEQUENCES OF VIOLATION OF THIS AML POLICY BY DESIGNATED PERSONS

In case of violations of the AML Policy, the Compliance Officer shall, after considering inputs, if any, from the Designated Director, have the discretion to do the following:

1. Corrective Action: If necessary, corrective actions shall be prescribed by the Compliance Officer to appropriate managers, officers, or other employees for implementation.
2. Penalties: The Compliance Officer shall, based on the investigation reports (if any) have the discretion to recommend appropriate disciplinary action, including suspension and termination of service, against such a defaulting Designated Person. Depending on the nature and scale of default of the AML Policy by the defaulting Designated Person, the Compliance Officer may also recommend to the Board to commence civil and/or criminal proceedings against such a Designated Person in order to enforce remedies available to SMAS under applicable laws.

ANNEXURE – 1

Procedure for determination of beneficial ownership is as under:

(a) Where the Investor constitutes a company, the beneficial owner shall comprise the natural person or persons who, either individually or collectively, or acting via one or more intermediary juridical entities, hold a controlling ownership interest in such company or exercise control by alternative means.

Explanation-For the purposes of this subclause:

1. "Controlling ownership interest" denotes ownership of, or entitlement to, greater than ten percent (10%) of the shares, capital, or profits of the company;
2. "Control" encompasses the authority to appoint a majority of the directors, or to direct the management or policy decisions of the company, whether arising from shareholding, management rights, shareholders' agreements, voting agreements, or analogous mechanisms.

(b) Where the Investor operates as a partnership firm, the beneficial owner shall comprise the natural person or persons who, either individually or collectively, or acting via one or more intermediary juridical entities, possess ownership of, or entitlement to, greater than fifteen percent (15%) of the capital or profits of such partnership.

(c) Where the Investor functions as an unincorporated association or a body of individuals, the beneficial owner shall comprise the natural person or persons who, either individually or collectively, or acting via one or more intermediary juridical entities, possess ownership of, or entitlement to, greater than fifteen percent (15%) of the property, capital, or profits of such association or body.

(d) In circumstances where no natural person is identifiable pursuant to subclauses (a), (b), or (c) above, the beneficial owner shall be the natural person occupying the position of senior managing official.

(e) Where the Investor is established as a trust, the identification of beneficial owner(s) shall encompass the author of the trust, the trustee, the beneficiaries holding ten percent (10%) or greater interest therein, and any other natural person exercising ultimate effective control over the trust via a chain of ownership or control.

(f) Notwithstanding the foregoing, where the Investor—or the entity holding the controlling interest therein—is a company listed on a recognized stock exchange, or constitutes a subsidiary of such a listed company, there shall be no requirement to identify or verify the identity of any shareholder or beneficial owner of such company.

ANNEXURE-2

Additional document to be obtained in case of Non-Individual Investor

Type of Entity	Documentary Requirement
Corporate	<ul style="list-style-type: none"> • Copy of the balance sheets for the last 2 financial years (to be submitted every year). • Copy of latest share holding pattern including list of all those holding control, either directly or indirectly, in the company in terms of SEBI takeover Regulations, duly certified by the company secretary/Whole time director/MD/ 2 Director in case no CS/WTD/MD (to be submitted every year). • Photograph, Proof of Identity, Proof of Address, PAN and DIN numbers of whole-time directors/two directors in charge of day-to-day operations. • Photograph, Proof of Identity, Proof of Address, PAN of individual promoters holding control - either directly or indirectly. • Copies of the Memorandum and Articles of Association and certificate of incorporation. • Copy of the Board Resolution for investment in securities market. • Authorized signatories list with specimen signatures. • List of Ultimate Beneficial Owner of the Company and their Proof of Identity and Proof of Address
Partnership Firm	<ul style="list-style-type: none"> • Copy of the balance sheets for the last 2 financial years (to be submitted every year). • Certificate of registration (for registered partnership firms only). Copy of partnership deed. • Authorized signatories list with specimen signatures. Photograph, Proof of Identity, Proof of Address, PAN of Partners. • List of Ultimate Beneficial Owner of the Partnership Firm and their Proof of Identity and Proof of Address
Trust	<ul style="list-style-type: none"> • Copy of the balance sheets for the last 2 financial years (to be submitted every year). • Certificate of registration (for registered trust only). • Copy of Trust deed. List of trustees certified by managing trustees/CA. Photograph, Proof of Identity, Proof of Address, PAN of Trustees. • List of Ultimate Beneficial Owner of the Trust and their Proof of Identity and Proof of Address
HUF	<ul style="list-style-type: none"> • PAN of HUF.

	<ul style="list-style-type: none"> • Deed of declaration of HUF/ List of coparceners. • Bank pass-book/bank statement in the name of HUF. • Photograph, Proof of Identity, Proof of Address, PAN of Karta
Unincorporated association or a body of individuals	<ul style="list-style-type: none"> • Proof of Existence/Constitution document. • Resolution of the managing body & Power of Attorney granted to transact business on its behalf. • Authorized signatories list with specimen signatures
Banks/Institutional Investors	<ul style="list-style-type: none"> • Copy of the constitution/registration or annual report/balance sheet for the last 2 financial years. • Authorized signatories list with specimen signatures
Foreign Institutional Investors (FII)/ Foreign Portfolio Investors (FPI)	<ul style="list-style-type: none"> • Copy of SEBI registration certificate. • Authorized signatories list with specimen signature
Army/ Government Bodies	<ul style="list-style-type: none"> • Self-certification on letterhead. • Authorized signatories list with specimen signatures
Registered Society	<ul style="list-style-type: none"> • Copy of Registration Certificate under Societies Registration Act, 1860. • List of Managing Committee members. • Committee resolution for persons authorized to act as authorized signatories with specimen signatures. • True copy of Society Rules and Bye Laws certified by the Chairman/Secretary

APPENDIX – I

SCHEDULE OF OFFENCES

OFFENCES UNDER THE BHARATIYA NYAYA SANHITA, 2023

SECTION	DESCRIPTION OF OFFENCE
61(2)	Criminal conspiracy.
147	Waging or attempting to wage war or abetting waging of war, against the Government of India.
148	Conspiracy to commit offences punishable by section 121 against the State.
178	Counterfeiting Government stamp.
181	Making or selling instrument for counterfeiting Government stamp.
179	Sale of counterfeit Government stamp.
180	Having possession of counterfeit Government stamp.
179	Using as genuine a Government stamp known to be counterfeit.
103	Murder.
105	Punishment for culpable homicide not amounting to murder.
109	Attempt to murder.
110	Attempt to commit culpable homicide.
119 (1)	Voluntarily causing hurt to extort property, or to constrain to an illegal act.
119(2)	Voluntarily causing grievous hurt to extort property, or to constrain to an illegal act.
140(2)	Kidnapping for ransom, etc.
308	Offences relating to extortion.
309(4)-310(5)	Offences relating to robbery and dacoity.
317(2)	Dishonestly receiving stolen property.
317(3)	Dishonestly receiving property stolen in the commission of a dacoity.
317(4)	Habitually dealing in stolen property.
317(5)	Assisting in concealment of stolen property.
318(2)	Punishment for cheating.
318(3)	Cheating with knowledge that wrongful loss may ensue to person whose interest offender is bound to protect.
319(2)	Punishment for cheating by personation.
318(4)	Cheating and dishonestly inducing delivery of property.
320	Dishonest or fraudulent removal or concealment of property to prevent distribution among creditors.

OFFENCES UNDER THE NARCOTIC DRUGS AND PSYCHOTROPIC SUBSTANCES ACT, 1985

SECTION	OFFENCE
15	Contravention in relation to poppy straw.
16	Contravention in relation to coca plant and coca leaves.
17	Contravention in relation to prepared opium.
18	Contravention in relation to opium poppy and opium.

19	Embezzlement of opium by cultivator.
20	Contravention in relation to cannabis plant and cannabis.
21	Contravention in relation to manufactured drugs and preparations.
22	Contravention in relation to psychotropic substances.
23	Illegal import into India, export from India or transhipment of narcotic drugs and psychotropic substances.
24	External dealings in narcotic drugs and psychotropic substances in contravention of section 12 of the Narcotic Drugs and Psychotropic Substances Act, 1985.
25A	Contravention of orders made under section 9A of the Narcotic Drugs and Psychotropic Substances Act, 1985.
27A	Financing illicit traffic and harbouring offenders
29	Abetment and criminal conspiracy.

OFFENCES UNDER THE EXPLOSIVE SUBSTANCES ACT, 1908

SECTION	OFFENCE
3	Causing explosion likely to endanger life or property.
4	Attempt to cause explosion, or for making or keeping explosives with intent to endanger life or property.
5	Attempt to cause explosion, or for making or keeping explosives with intent to endanger life or property.

OFFENCES UNDER THE UNLAWFUL ACTIVITIES (PREVENTION) ACT, 1967

SECTION	OFFENCE
10 read with section 3	Penalty for being member of an unlawful association, etc.
11 read with section 3	Penalty for dealing with funds of an unlawful association.
13 read with section 3	Punishment for unlawful activities.
16 read with section 15	Punishment for terrorist act.
16A	Punishment for making demands of radioactive substances, nuclear devices, etc.
17	Punishment for raising funds for terrorist act.
18	Punishment for conspiracy, etc.
18A	Punishment for organization of terrorist camps.
18B	Punishment for recruiting of any person or persons for terrorist
19	Punishment for harboring, etc.
20	Punishment for being member of terrorist gang organization.
21	Punishment for holding proceeds of terrorism.
38	Offence relating to membership of a terrorist organization.

39	Offence relating to support given to a terrorist organization.
40	Offence of raising fund for a terrorist organization.

OFFENCES UNDER THE ARMS ACT, 1959

SECTION	OFFENCE
25	<p>To manufacture, sell, transfer, convert, repair or test or prove or expose or offer for sale or transfer or have in his possession for sale, transfer, conversion, repair, test or proof, any arms or ammunition in contravention of section 5 of the Arms Act, 1959.</p> <p>To acquire, have in possession or carry any prohibited arms or prohibited ammunition in contravention of section 7 of the Arms Act, 1959.</p> <p>Contravention of section 24A of the Arms Act, 1959 relating to prohibition as to possession of notified arms in disturbed areas, etc.</p> <p>Contravention of section 24B of the Arms Act, 1959 relating to prohibition as to carrying of notified arms in or through public places in disturbed areas.</p> <p>Other offences specified in section 25.</p>
26	<p>To do any act in contravention of any provisions of section 3, 4, 10 or section 12 of the Arms Act, 1959 in such manner as specified in sub-section (1) of section 26 of the said Act.</p> <p>To do any act in contravention of any provisions of section 5, 6, 7 or section 11 of the Arms Act, 1959 in such manner as specified in sub-section (2) of section 26 of the said Act.</p> <p>Other offences specified in section 26.</p>
27	Use of arms or ammunitions in contravention of section 5 or use of any arms or ammunition in contravention of section 7 of the Arms Act, 1959.
28	Use and possession of fire arms or imitation fire arms in certain cases.
29	Knowingly purchasing arms from unlicensed person or for delivering arms, etc., to person not entitled to possess the same.
30	Contravention of any condition of a licence or any provisions of the Arms Act, 1959 or any rule made thereunder.

OFFENCES UNDER THE WILD LIFE (PROTECTION) ACT, 1972

SECTION	OFFENCE
51 read with section 9	Hunting of wild animals.
51 read with section 17A	Contravention of provisions of section 17A relating to prohibition of picking, uprooting, etc., of specified plants.
51 read with section 39	Contravention of provisions of section 39 relating to wild animals, etc., to be Government property
51 read with section 44	Contravention of provisions of section 44 relating to dealings in trophy and animal articles without license prohibited.
51 read with section 48	Contravention of provisions of section 48 relating to purchase of animal, etc., by licensee.
51 read with section 949B	Contravention of provisions of section 49B relating to prohibition of dealings in trophies, animals' articles, etc., derived from scheduled animals.

OFFENCES UNDER THE IMMORAL TRAFFIC (PREVENTION) ACT, 1956

SECTION	OFFENCE
5	Procuring, inducing or taking person for the sake of prostitution.

6	Detaining a person in premises where prostitution is carried on
8	Seducing or soliciting for purpose of prostitution.
9	Seduction of a person in custody

OFFENCES UNDER THE PREVENTION OF CORRUPTION ACT, 1988

SECTION	OFFENCE
7	Public servant taking gratification other than legal remuneration in respect of an official act.
8	Taking gratification in order, by corrupt or illegal means, to influence public servant.
9	Taking gratification for exercise of personal influence with public servant.
10	Abetment by public servant of offences defined in section 8 or section 9 of the Prevention of Corruption Act, 1988.
13	Criminal misconduct by a public servant.

OFFENCES UNDER THE EXPLOSIVES ACT, 1884

SECTION	OFFENCE
9B	Punishment for certain offences.
9C	Offences by companies.

OFFENCES UNDER THE ANTIQUITIES AND ARTS TREASURES ACT, 1972

SECTION	OFFENCE
25 read with section 3	Contravention of export trade in antiquities and art treasures.
28	Offences by companies.

OFFENCES UNDER THE SECURITIES AND EXCHANGE BOARD OF INDIA ACT, 1992

SECTION	OFFENCE
12A read with section 24	Prohibition of manipulative and deceptive devices, insider trading and substantial.
24	Acquisition of securities or control.

OFFENCES UNDER THE CUSTOMS ACT, 1962

SECTION	OFFENCE
135	Evasion of duty or prohibitions.

OFFENCES UNDER THE BONDED LABOUR SYSTEM (ABOLITION) ACT, 1976

SECTION	OFFENCE
16	Punishment for enforcement of bonded labour.
18	Punishment for extracting bonded labour under the bonded labour system.
20	Abetment to be an offence.

OFFENCES UNDER THE CHILD LABOUR (PROHIBITION AND REGULATION) ACT, 1986

SECTION	OFFENCE
14	Punishment for employment of any child to work in contravention of the provisions of section 3

OFFENCES UNDER THE TRANSPLANTATION OF HUMAN ORGANS ACT, 1994

SECTION	OFFENCE
18	Punishment for removal of human organ without authority.
19	Punishment for commercial dealings in human organs.
20	Punishment for contravention of any other provision of this Act.

OFFENCES UNDER THE JUVENILE JUSTICE (CARE AND PROTECTION OF CHILDREN) ACT, 2000

SECTION	OFFENCE
23	Punishment for cruelty to juvenile or child.
24	Employment of juvenile or child for begging.
25	Penalty for giving intoxicating liquor or narcotic drug or psychotropic substance to juvenile or child.
26	Exploitation of juvenile or child employee.

OFFENCES UNDER THE EMIGRATION ACT, 1983

SECTION	OFFENCE
24	Offences and penalties.

OFFENCES UNDER THE PASSPORTS ACT, 1967

SECTION	OFFENCE
12	Offences and penalties.

OFFENCES UNDER THE FOREIGNERS ACT, 1946

SECTION	OFFENCE
14	Penalty for contravention of provisions of the Act, etc.
14B	Penalty for using forged passport
14C	Penalty for abetment.

OFFENCES UNDER THE COPYRIGHT ACT, 1957

SECTION	OFFENCE
63	Offence of infringement of copyright or other rights conferred by this Act

63A	Enhanced penalty on second and subsequent convictions.
64B	Knowing use of infringing copy of computer program.
68A	Penalty for contravention of section 52A.

OFFENCES UNDER THE TRADEMARKS ACT, 1999

SECTION	OFFENCE
103	Penalty for applying false trademarks, trade descriptions, etc.
103	Penalty for selling goods or providing services to which false trademark or false trade description is applied.
105	Enhanced penalty on second or subsequent conviction.
107	Penalty for falsely representing a trademark as registered.
120	Punishment of abetment in India of acts done out of India.

OFFENCES UNDER THE INFORMATION TECHNOLOGY ACT, 2000

SECTION	OFFENCE
72	Penalty for breach of confidentiality and privacy.
75	Act to apply for offence or contravention committed outside India.

OFFENCES UNDER THE BIOLOGICAL DIVERSITY ACT, 2002

SECTION	OFFENCE
55 read with section 6	Penalties for contravention of section 6, etc.

OFFENCES UNDER THE PROTECTION OF PLANT VARIETIES AND FARMERS ACT, 2001

SECTION	OFFENCE
70 read with section 68	Penalty for applying false denomination, etc.
71 read with section 68	Penalty for selling varieties to which false denomination is applied.
72 read with section 68	Penalty for falsely representing a variety as registered.
73 read with section 68	Penalty for subsequent offence.

OFFENCES UNDER THE ENVIRONMENT PROTECTION ACT, 1986

SECTION	OFFENCE
15 read with section 7	Penalty for discharging environmental pollutants, etc., in excess of prescribed standards.
15 read with section 8	Penalty for handling hazardous substances without complying with procedural Safeguards.

OFFENCES UNDER THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT, 1974

SECTION	OFFENCE
41(2)	Penalty for pollution of stream or well.
43	Penalty for contravention of provisions of section 24.

OFFENCES UNDER THE SUPPRESSION OF UNLAWFUL, ACTS AGAINST SAFETY OF MARITIME NAVIGATION AND FIXED PLATFORMS ON CONTINENTAL SHELF ACT, 2002

SECTION	OFFENCE
3	Offences against ship, fixed platform, cargo of a ship, maritime navigational facilities, etc.]

OFFENCES UNDER THE COMPANIES ACT, 2013

SECTION	OFFENCE
447	Punishment for fraud]

OFFENCE UNDER THE CUSTOMS ACT, 1962

SECTION	OFFENCE
132	False declaration, false documents, etc.

APPENDIX – II

<u>Name of the Member</u>	<u>Designation</u>	<u>Member(s) of Anti-Money Laundering Policy</u>
Hidenaga Aoki	Managing Director	Designate Director
Kazuhiro Hasumi	Director	Compliance Officer