

POLICY

ON

ANTI MONEY LAUNDERING

For & Exclusive use of MSBPL

Reviewed on 18.04.19

Revised on 18.04.19

MNM STOCK BROKING PRIVATE LIMITED

1. BACKGROUND:

The Prevention of Money Laundering Act, 2002 (as amended) was notified on July 1, 2005. The Securities and Exchange Board of India (SEBI) on 18th January, 2006 required market intermediaries to adopt anti money laundering measure to be followed by the intermediaries. MNM Stock Broking Private Limited (MSBPL) is inter alia a stock broker and depository participants and therefore needs to adhere to the same.

2. OBJECTIVES:

A.] Money laundering has now become one of the major concerns of international financial community. Money Laundering is not just an attempt to disguise money derived from illegal activities. Rather, money laundering is involvement in any transaction or series of transactions that seek to conceal or disguise the nature or source of proceeds derived from illegal activities, including drug trafficking, terrorism, organized crime, fraud and many other crimes.

B.] “Know Your Client” (KYC) is the guiding principle behind the Anti-Money Laundering (AML) measures. PMLA incorporates KYC standards and AML measures. The objective is to “have in place adequate policies, practices and procedures that promote high ethical and professional standards and prevent the company from being used, intentionally or unintentionally, by criminal elements”. KYC and AML measures would enable the company to know/ understand its clients, the beneficial owners in case of non-individual entities, the principals behind clients who are acting as agents, and their financial dealings better, which, in turn, will help the Company to monitor and manage its risks prudently.

3. FINANCIAL INTELLIGENCE UNIT (FIU) – INDIA:

The Government of India has set up a Financial Intelligence Unit – India (FIU-IND) on November 18, 2004 as an Independent Body to report directly to the Economic Intelligence Council (EIC) headed by the Finance Minister.

FIU has been set up as Central National Agency responsible for receiving, processing, analyzing and disseminating information related to suspect financial transactions. FIU-IND is also responsible for coordinating and stretching efforts of national and international intelligence and enforcement agencies in pursuing in pursuing the global efforts and related crimes.

4. POLICY OF MNM STOCK BROKING PRIVATE LIMITED:

MNM Stock Broking Private Limited (MSBPL) has resolved that it would, as an internal policy, take adequate measure to prevent money laundering and shall put in place a frame work to report cash and suspicious transactions to FIU as per the guidelines of PMLA Rules, 2002.

5. IMPLEMENTATION OF POLICY:

5.1] Shri Nilesh K. Modi, is the Principal Officer & Designated Director who is responsible for:

- Compliance of the provisions of PMLA and AML guidelines;
- Act as central reference point and play an active role in identification and assessment of potentially suspicious transactions;
- Ensure that MSBPL discharges its legal obligation to reporting suspicious transaction to the concerned authorities.

5.2] The Main aspects of this policy is customer due diligence process which means:

- Obtaining sufficient information about to the client who is the beneficial owner of the securities and on whose behalf the transactions is conducted;
- Verify the customers' identity using reliable, independent source document, date or information;
- Conduct on-going due diligence and scrutiny of the account/client to ensure that the transactions conducted are consistent with the clients' background/financial status, its activities and risk profile.

5.3] The customer due diligence process includes three specific parameters:

- Policy for acceptance of clients.
- Client Identification Procedure.
- Suspicious Transaction Identification and Reporting.

6. CUSTOMER DUE DILIGENCE PROCESS:

6.1 Customer acceptance policy:

- **Each client should meet in person:** Accept client whom we are able to meet personally. Either the client should visit office/branch or concerned official may visit the client at his residency / office address to get the necessary documents filed in and signed.
- **Accept client on whom we are able to apply appropriate KYC procedures:** Obtain complete information from the client. It should be ensured that the initial forms taken by the client filled in completely. All supporting documents as specified by Securities and Exchange Board of India (SEBI) and Exchanges are obtained and verified.
- **Do not accept clients with identity matching persons known to have criminal background:** Check whether the client's identify matches with any person having known criminal background or is not banned in any other manner, whether in terms of criminal or civil proceedings by any enforcement/regulatory agency worldwide.

- **Be careful accepting clients of special category:** We should be careful while accepting clients of special category like NRIs, HNIs, Trust, Charities, NGOs, Politically exposed Persons (PEP), persons of foreign origin, companies having closed share holding/ownership, companies dealing in foreign currency, shell companies, overseas entities, clients in high risk countries, non face to face clients, and clients with dubious background. Current / Former Head of State, Current/Former senior high profile politician, companies offering foreign exchange, etc.) or clients from high-risk countries (like Libya, Pakistan, Afghanistan, etc.) or clients belonging to countries where corruption/fraud level is high (like Nigeria, Burma, etc.). Scrutinize periodically the records / documents pertaining to clients belonging to aforesaid category.
- **Do not accept client registration forms which are suspected to be fictitious:** Ensure that no account is being opened in a fictitious / benami name or on an anonymous basis.
- **Do not compromise on submission of mandatory information/documents:** Client's account should be opened only on receipt of mandatory information along with authentic supporting documents as per the regulatory guidelines. Do not open the accounts where the client refuses to provide information/documents and we should have sufficient reason to reject the client towards this reluctance.
- **List of Designated Individuals/Entities:** Before client opens an account, MSBPL will verify the name & PAN of clients with names in any of the following lists:
 - An updated list of individuals & entities as approved by the Security Council Committee pursuant to various UN Security Council Resolutions at the time of account opening and also scans the said data base on continuous basis for all registered clients.
 - Clients Debarred by Regulatory authorities like SEBI, Exchanges, Depositories etc.
 - Regulatory authority has taken/ proposed actions under IPC or taken penal proceedings against any proposed client
 - Such other list that may be specified by the Regulators / Compliance Department from time to time like person having known criminal background is not banned in any other manner, whether in terms of criminal or civil proceedings by any enforcement agency worldwide, web-sites like watch out investors, Search engines like Yahoo, Google, etc.

6.2 Customer Identification Procedure:

Objective: To have a mechanism in place to establish identity of the client along with firm proof of address to prevent opening of any account which is fictitious / benami / anonymous in nature.

6.2.1 Documents which can be relied upon:

- PAN Card: PAN card is mandatory and is most reliable document as only one card is issued to an individual and we can independently check its genuineness through IT website.
- IDENTITY Proof: PAN Card itself can serve as proof of identity. However, in case PAN card carries an old photograph of the holder, which does not match current facial features of the client, we should take other identity proof in form of Voter's Identity Card, Passport, Ration Card or any Government/PSU/Bank issued photo identity card.
- ADDRESS Proof: For valid proof we can rely on Voter's Identity CARD, Passport, Bank Statement, Ration Card and latest Electricity/Telephone bill in the name of the client.

6.2.1 Documents to be obtained as part of customer identification procedure for new clients:

- a. In case of Individuals, one copy of the following documents have to be obtained:
 - As PAN is mandatory, verify its genuineness with IT website and cross verify the PAN card copy with the Original.
 - Other Proofs for identity are Voter's Identity card, Passport, Ration Card or any Government/PSI/Bank issued photo identity card, Passport, Ration Card or any Government/PSU/Bank issued photo identity card or any other document prescribed by the regulatory authorities.
 - Address proof in the form of Voter's Identity Card, Bank Statement, Ration Card and latest Electricity/telephone bill in the name of the client or any other document prescribed by the regulatory authorities.
- b. In case of corporates, one certified copy of the following documents must be obtained:
 - Copy of the Registration / Incorporation Certificate.
 - Copy of the Memorandum & Articles of the Association.
 - Copy of the PAN Card of entity and the Directors & Directors Identification No. (DIN).
 - Copy of the latest audited Annual report of the corporate client.
 - Latest Net worth certificate.
 - Latest Income Tax return filed.
 - Board Resolution for appointment of the Authorized Person who will operate the account.
 - Proof of address and identity of Authorised Person.

- c. In case of partnership firm one certified copy of the following must be obtained:
- Registration Certificate.
 - Partnership Deed.
 - PAN card of entity & partners.
 - Authorised letter for the person authorised to open and operate the account.
 - Proof of identity and address of the authorised person.
 - Annual statement/returns of the partnership firm.
- d. In case of an NRI account – Repatriable/Non-Repatriable, the following documents are required:
- Copy of the PIS permission issued by the Bank
 - Copy of the passport
 - Copy of PAN card
 - Proof of overseas address and Indian address
 - Copy of the bank statement
 - Copy of the demat statement
 - FEMA declaration

6.3 As per guidance provided by SEBI/BSE/NSE/CDSL, MSBPL obtains sufficient information from the clients in order to identify person who beneficially owns and controls accounts.

As per SEBI circular **CIR/MIRSD/2/2013**, dated 24.01.2013, the beneficial owner has been defined as follows: the natural person or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a legal person or arrangement.

- Where the client is a company, partnership or unincorporated association/body of individuals, MSBPL verify the identity of such persons, through the following information

-The identity of the natural person, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest.

Controlling ownership interest means ownership of/entitlement to:

- i. more than 25% of shares or capital or profits of the juridical person, where the juridical person is a company;
- ii. more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership; or
- iii. more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.

Where no natural person is identified, the identity of the relevant natural person who holds the position of senior managing official.

Where the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

The documents provided by the clients will be reviewed on a periodic basis, mostly yearly and will be updated as per the latest requirements and guidelines of the regulatory bodies.

7. RISK ASSESSMENT

Risk assessment has been done to identify, assess, and take effective measures to mitigate money laundering and terrorist financing risk with respect to clients, countries or geographical areas, nature and volume of transactions, payment method used by clients, etc. It also include any country specific information circulated by Government of India, SEBI etc. from time to time and updated list of individuals and entities who are subjected to sanction measures as required under United Nation's Security Council Resolutions. This assessment will be properly documented, regularly updated and made available to competent authorities and self-regulating bodies as and when required.

8. RISK PROFILING OF THE CLIENT:

7.1 We should accept the clients based on the risk they are likely to pose. The aim is to identify clients who are likely to pose a higher than average risk of money laundering or terrorist financing. For this purpose, we need to classify the clients as Low Risk, Medium Risk and High Risk Clients. By classifying the clients, we will be in better position to apply appropriate customer due diligence process. That is, for high risk client we have to apply higher degree of due diligence. The factors of risk perception depend on client's location, nature of business activity, turnover, nature of transactions, manner of payment, etc.

8.2 In order to achieve this objective, all clients of the branch should be classified in the following category:

- Category A – Low Risk
- Category B – Medium Risk
- Category C – High Risk

- 8.2.1 Category A Clients are those pose low or nil risk. They are good corporate/HNIs who have respectable social and financial standing. These are the clients who make payment on time and take delivery of shares.
- 8.2.2 Category B clients are those who are intra-day clients or speculative clients. These are the clients who maintain running account MSBPL.
- 8.2.3 Category C clients are those who have defaulted in the past, have suspicious background, do not have any financial status, etc.
- 8.3 The categorization of the client will be first done by the KYC Department and the client will then be placed under monitoring of Risk Management Department (RM) of the company.
- 8.4 We have to be careful while monitoring the transactions of B and C category clients.
- 8.5 Apart from this we need to exercise extra caution while monitoring the transactions of NRI/NRE/PIO and Foreign clients, especially when the payment is being made in foreign currency.
- 8.6 Any change in the risk profile of the client/mandate holder, has to be ascertained by the RM Department in consultation with Compliance and KYC Departments and reported to Shri Nilesh K. Modi, immediately.

Client of Special Category

Due care shall be taken while accepting clients of Special category.

Clients of Special Category include but shall not be limited to the following

- ❖ Non Residents Clients
- ❖ High Net Worth Clients
- ❖ Trust, Charities, Non- Government Organizations (NGOs) and Organizations receiving donations.
- ❖ Companies having close family shareholdings or beneficial ownership
- ❖ Politically exposed persons (PEP) of foreign origin
- ❖ Companies offering foreign exchange offerings
- ❖ Clients in high risk countries
- ❖ Non face to face clients
- ❖ Clients with dubious reputation as per public information available

TREATMENT OF ACCOUNTS OF CLIENTS OF SPECIAL CATEGORY

1. NRI: - While opening NRI account utmost care should be exercised. Collect the following documents

- ❖ PAN Card Copy
- ❖ Pass Port Copy with date of arrival in case personal visit
- ❖ Indian & foreign Address Proof
- ❖ Cancelled cheque copy of NRE A/c, along with PIS permission issued from RBI & Bank statement copy

- ❖ Client master copy for demat account
- ❖ FEMA declaration

2. High Net worth Clients:-High Net worth clients could be classified as such if at the account opening stage or during the course of the relationship, it is realized that the client's investments or the appropriate for investment is high.

3. Trust, Charity and NGOs: -Public as well as private, registered as well as unregistered trust will have to be classified in the special category.

4. Politically Exposed Person: - In case of PEPs, the account should be opened only after consent of the senior management and principal officer & all the required documents are collected and client should be marked as PEP in records. Where a client has been accepted and the client or beneficial owner is subsequently found to be, or subsequently becomes a PEP, registered intermediaries shall obtain senior management approval to continue the business relationship.

9. MONITORING OF TRANSACTIONS:

8.1 Continuous monitoring is an essential ingredient of effective KYC procedures and the extent of monitoring should be according to the risk sensitivity of the account. All clients will be under continuous monitoring of RM Department and it shall pay special attention to all complex, unusually large transactions and all unusual patterns which have no apparent economic or visible lawful purpose. Transactions that involve large amount of cash inconsistent with the size of the balance maintained may indicate that the funds are being 'washed' through the account. High risk accounts shall be subjected to intensive monitoring.

8.2 In case of any unusual trading found in the account, the RM Department first inform to the Compliance Department which will report to the Board of Directors of company and will take appropriate action as per the direction of the board of directors.

8.3 The board of directors may appoint internal auditor to check and verify the application of KYC procedures.

10. SUSPICIOUS TRANSACTIONS:

All are requested to analyze and furnish details of suspicious transactions, whether or not made in cash. It should be ensured that there is no undue delay in analysis and arriving at a conclusion.

9.1 What is a Suspicious Transaction: Suspicious transaction means a transaction whether or not made in cash, which to a person acting in good faith –

- Give rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
- Appears to be made in circumstance of unusual or unjustified complexity; or
- Appears to have no economic rationale or bona fide purpose.

Reasons for Suspicious:

- Identity of client:
 - False identification documents
 - Identification documents which could not be verified within reasonable time
 - Non-face to face client
 - Clients in high – risk jurisdiction
 - Doubt over the real beneficiary of the account
 - Accounts opened with names very close to other established business entities
 - Receipt back of well-come kit undelivered at the address given by the client.
- Suspicious Background:
 - Suspicious background or links with criminals
- Multiple Accounts:
 - Large number of accounts having a common parameters such as common partners / directors / promoters / address / email address / telephone numbers introducers or authorised signatory
 - Unexplained transfers between such multiple accounts.
- Activity in Accounts:
 - Unusual activity compared to past transactions
 - Use of different accounts by clients alternatively
 - Sudden activity in dormant accounts
 - Activity inconsistent with what would be expected from declared business
 - Account used for circular trading.

- Nature of Transactions:
 - Unusual or unjustified complexity
 - No economic rationale or benefited purpose
 - Source of funds are doubtful
 - Appears to be case of insider trading
 - Purchase made on own account transferred to a third party through an off market transactions through DP account
 - Transactions reflect likely market manipulations
 - Suspicious off market transactions

- Value of Transactions:
 - Value just under the reporting threshold amount in an apparent attempt to avoid reporting
 - Large sums being transferred from overseas for making payments
 - Inconsistent with the clients apparent financial standing
 - Inconsistency in the payment by client
 - Block deal which is not at market price or prices appears to be artificially inflated / deflated.

10.2 What to Report:

- The nature of transactions
- The amount of the transactions and the currency in which it was denominated
- The date on which the transactions was conducted; and
- The parties to the transactions;
- The reason of suspicion.

11. RECORD KEEPING:

- To comply with the record keeping requirements contained in the SEBI Act, 1992, Rules and Regulations made there-under, PML Act, 2002 as well as other relevant legislation, Rules, Regulations, Exchange Bye-laws and Circulars.
- Maintaining such records as are sufficient to permit reconstruction of individual transactions (including the amounts and types of currencies involved, if any) so as to provide, if necessary, evidence for prosecution of criminal behavior.
- Should there be any suspected drug related or other laundered money or terrorist property, the competent investigating authorities would need to trace through the audit trail for reconstructing a financial profile of the suspect account.

- To enable this reconstruction, registered intermediaries should retain the following information for the accounts of their customers in order to maintain a satisfactory audit trail:
 - (a) The beneficial owner of the account;
 - (b) The volume of the funds flowing through the account; and
 - (c) For selected transactions:
 - The origin of the funds;
 - The form in which the funds were offered or withdrawn, e.g. cash, cheques, etc;
 - The identity of the person undertaking the transaction;
 - The destination of the funds;
 - The form of instruction and authority.
- Ensure that all customers and transaction records and information are available on a timely basis to the competent investigating authorities. Where appropriate, they should consider retaining certain records, e.g. customer identification, account files, and business correspondence, for periods which may exceed that required under the SEBI Act, Rules and Regulations framed there-under PMLA 2002, other relevant legislations, Rules and Regulations or Exchange bye-laws or circulars.
- Maintain updated list of individuals / entities which are subject to various sanctions / measures pursuant to United Nations Security Council Resolutions (UNSCR), available from the URL <http://www.un.org/sc/committees/1267/consolist.shtml>. (Referred to as designated individual / entities) in electronic form. Ensure before opening any new account that the name of the proposed customer does not appear in the list of designated individuals / entities.
- Continuously scan all existing accounts to ensure that no account is held by or linked to any of the entities or individuals included in the list. In the event of matching any particulars of designated individuals / entities, inform the full particulars of the funds, financial assets or economic resources or related services held in the form of securities, within 24 hours to the Joint Secretary (IS.I) Ministry of Home Affairs, at a given fax / phone number and email id. It should also be sent to the email id and address of SEBI as mentioned. In the event of matching the details beyond doubt, prevent the persons from conducting any further financial transactions under intimation to the Joint Secretary (IS.I) Ministry of Home Affairs, at a given fax/phone number and email id. It should also be sent to the email id and address of SEBI as mentioned. File STR to FIU,IND, covering all transactions

12. RETENTION OF RECORDS:

In terms of rules made under the PMLA Act, MSBPL shall maintain and preserve a record of:

(a) All suspicious transactions whether or not made in cash **for a period of Five years**;

(b) 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, account files, business correspondence and all other details as per PMLA guide line **for a period of Five years after the business relationship between client and intermediary has ended or the account has been closed whichever is later**.

(c) Suspicious records along with the records of the identity of clients shall be maintained and preserved **for a period of Five years** or as may be in force from time to time from the date of cessation of the transaction between the Client and intermediaries

Also, In terms of SEBI (D&P) Regulation, 2018 dated 03.10.2018, MSBPL shall maintain and preserve all records and information for a period of 8 years in the manner that allows easy and quick retrieval of data

13. REPORTING TO FIU-IND

For Cash Transaction Reporting

- All dealing in Cash that requiring reporting to the FIU IND will be done in the CTR format and in the matter and at intervals as prescribed by the FIU IND

For Suspicious Transactions Reporting:-

We will make a note of Suspicion Transaction that have not been explained to the satisfaction of the Principal Officer and thereafter report the same to the FIU IND and at intervals as prescribed by the FIU IND.

This will typically be in cases where we know, suspect, or have reason to suspect:

- the transaction involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity as part of a plan to violate or evade any the transaction reporting requirement,
- the transaction is designed, whether through structuring or otherwise, to evade the any requirements of PMLA Act and Rules framed thereof

- the transaction has no business or apparent lawful purpose or is not the sort in which the customer would normally be expected to engage, and we know, after examining the background, possible purpose of the transaction and other facts, of no reasonable explanation for the transaction, or
- the transaction involves the use of the company to facilitate criminal activity.

We will not base our decision on whether to file a STR solely on whether the transaction falls above a set threshold. We will file a STR and notify law enforcement of all transactions that raise an identifiable suspicion of criminal, terrorist, or corrupt activities.

All STRs will be reported to the Board of Directors, with a clear reminder of the need to maintain the confidentiality of the STRs

We will not notify any person involved in the transaction that the transaction has been reported, except as permitted by the PMLA Act and Rules thereof.

DUE DATE FOR REPORTING:

Cash Transaction Report: **15th Day** of the Succeeding month

Suspicious Transaction Report: **7th Day** of the succeeding month

14. FREEZING OF FUNDS, FINANCIAL ASSETS OR ECONOMIC RESOURCES OR RELATED SERVICES

Section 51A, of the Unlawful Activities (Prevention) Act, 1967 (UAPA), relating to the purpose of prevention of, and for coping with terrorist activities was brought into effect through UAPA Amendment Act, 2008. In this regard, the Central Government has issued an Order dated August 27, 2009 detailing the procedure for the implementation of Section 51A of the UAPA.

Under the aforementioned Section, the Central Government is empowered to freeze, seize or attach funds and other financial assets or economic resources held by, on behalf of, or at the direction of the individuals or entities listed in the Schedule to the Order, or any other person engaged in or suspected to be engaged in terrorism. The Government is also further empowered to prohibit any individual or entity from making any funds, financial assets or economic resources or related services available for the benefit of the individuals or entities listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism. The obligations to be followed by intermediaries to ensure the effective and expeditious implementation of said Order has been issued vide SEBI Circular ref. no: ISD/AML/CIR-2/2009 dated October 23, 2009, which needs to be complied with scrupulously.

15. INVESTORS' EDUCATION

MSBPL shall prepare this specific literature so that the clients/sub-brokers/Authorised Person can be educated on the objectives of the Anti-Money Laundering (AML) / Combating Financing of Terrorism (CFT) programmed.

16. EMPLOYEES' HIRING AND TRAINING:

➤ Hiring of Employees

MSBPL shall have adequate screening procedures in place to ensure high standard when hiring employees. It shall identify the key positions within the MSBPL's structure having regard to the risk of money laundering and terrorist financing.

➤ Employees' Training

MSBPL shall have an ongoing employee-training programmed so that their staff are adequately trained in Anti Money Laundering and Combating Financing of Terrorism procedure

17. POLICY REVIEW AND UPDATION

The policy shall be reviewed and updated on a yearly basis by the management by person other than the director who has drafted/updated the policy initially and also implement the change in case of any change in the Anti-Money Laundering Act 2002 or change in any other act, bye-laws, rules, regulations of SEBI, CBI or in any statutory and regulatory government department related to or affect to this.

While reviewing the policy, following Amendments to Prevention of Money-laundering Rules, were taken into consideration:

Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under wide circular ref. no. **SEBI/ HO/ MIRSD/ DOS3/ CIR/ P/ 2018/ 104, dated 04.07.2018.**

18. APPROVAL FROM THE BOARD

We have approved this AML program as reasonably designed to achieve and monitor our company's ongoing compliance with the requirements of the PMLA and the implementing regulations under it.

The board of director has accorded their consent in implementing this policy as on **18.04.19**

19. DESIGNATED PRINCIPAL OFFICER:

In case any further information / clarification is required in this regard, the “Principal Officer” may be contacted.

Mr. Nilesh K. Modi
MNM Stock Broking Private Limited
101 J P Complex, Opp C N Vidhyalaya,
Near Ambawadi Circle, Ambawadi ,
Ahmedabad-380015.
Tel.: 079 – 26464676
Email: principalofficer@mnmshares.com, mmmstockbroking@yahoo.com

20. DESIGNATED DIRECTOR:

A Designated Director has been appointed for compliance to AML Policy

Mr. Nilesh K. Modi
Director & Compliance Officer
MNM Stock Broking Private Limited
101 J P Complex, Opp C N Vidhyalaya,
Near Ambawadi Circle, Ambawadi ,
Ahmedabad-380015.
.Tel.: 079 – 26464676
Email: barodian999@yahoo.com

Revision

Date	Version	Remarks	Authorised
APRIL 2019	1.0	Policy Revised	Manisha Modi