

ANTI-MONEY LAUNDERING POLICY

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ZENITH GLOBAL

206, GODREJ ANANDAM ARCADE, MODEL MILL COMPOUND, GANESHPETH, NAGPUR, Maharashtra,
India.

1. Introduction

Zenith Global ("the Company") recognizes the importance of combating money laundering and terrorist financing activities. This Anti-Money Laundering (AML) Policy outlines the Company's commitment to complying with applicable laws and regulations in India and implementing robust measures to prevent and detect illicit activities.

2. Legal and Regulatory Framework

The AML Policy of Zenith Global is based on the following laws, regulations, and guidelines:

- The Prevention of Money Laundering Act, 2002 (PMLA) and its subsequent amendments.
- Rules and regulations issued by the Reserve Bank of India (RBI), Securities and Exchange Board of India (SEBI), and other regulatory authorities pertaining to AML/CFT.
- Guidelines and circulars issued by regulatory authorities related to customer due diligence, record-keeping, and reporting of suspicious transactions.

3. Key Principles

a. Customer Due Diligence (CDD):

- The Company will establish risk-based procedures for identifying and verifying the identity of customers, including individuals, legal entities, and beneficial owners.
- Enhanced due diligence measures will be applied to high-risk customers, politically exposed persons (PEPs), and transactions with countries identified as high risk.

b. Know Your Customer (KYC):

- The Company will obtain sufficient information about its customers to understand the nature of their business activities, source of funds, and intended purpose of transactions.
- Ongoing monitoring of customer transactions and updating of KYC information will be conducted regularly to ensure accuracy and completeness.

c. Risk Assessment:

- The Company will assess the money laundering and terrorist financing risks associated with its products, services, customers, and geographic locations.

- Risk assessments will be periodically reviewed and updated to reflect changes in the business environment and regulatory requirements.

d. Record Keeping:

- The Company will maintain accurate and complete records of customer identification data, transaction details, and supporting documentation in accordance with regulatory requirements.
- Records will be retained for the prescribed period and made available to regulatory authorities upon request.

e. Reporting:

- The Company will promptly report any suspicious transactions or activities to the Financial Intelligence Unit-India (FIU-IND) or other designated authorities as required by law.
- Designated employees will be trained to recognize red flags and indicators of suspicious activity and file suspicious transaction reports (STRs) in a timely manner.

4. Responsibilities

a. Board of Directors:

- The Board is responsible for providing oversight and strategic direction on AML/CFT matters, including approving the AML Policy and monitoring its implementation.
- The Board will receive regular reports from the Compliance Officer on AML compliance and effectiveness.

b. Compliance Officer:

- The Compliance Officer is responsible for developing, implementing, and overseeing the Company's AML Program.
- Duties include conducting risk assessments, developing policies and procedures, providing training to employees, and ensuring compliance with regulatory requirements.

c. Employees:

- All employees are responsible for adhering to the AML Policy and complying with established procedures and controls.
- Employees must report any suspicions or concerns regarding potential money laundering or terrorist financing activities to the Compliance Officer or designated authorities.

5. Compliance and Monitoring

- The Compliance Officer will conduct regular reviews and assessments of the AML Program to evaluate its effectiveness and identify areas for improvement.
- Internal audits and reviews will be conducted periodically to assess compliance with the AML Policy and applicable laws and regulations.
- The Compliance Officer will update the AML Policy as necessary to reflect changes in laws, regulations, or business practices.

6. Enforcement and Disciplinary Action

- Non-compliance with the AML Policy may result in disciplinary action, including but not limited to warnings, suspension, termination of employment, or legal action.
- The Company will cooperate fully with regulatory authorities and law enforcement agencies in investigations related to money laundering or terrorist financing activities.

7. Conclusion

Zenith Global is committed to maintaining a strong culture of compliance and integrity and will continue to implement robust measures to prevent and detect money laundering and terrorist financing activities.