

WINVEST CAPITALS

Address – 401-A 4TH Floor, Gurudatta Plaza,
Beside HP Petrol pump, Ganesh Colony Road, Jalgaon,
Jalgaon (M Corp.), Jalgaon- 425001

Email Id: winvestcapitals25@gmail.com Phone Number: +919579557272

ANTI-MONEY LAUNDERING (AML) & PMLA COMPLIANCE POLICY *(Framed in accordance with PMLA, 2002 and SEBI Master Circulars)*

1. Objective and Scope

This policy establishes internal controls to prevent my sole proprietorship from being used, intentionally or unintentionally, by criminal elements for money laundering or terrorist financing. It applies strictly to all client onboarding and advisory fee collection processes.

2. Key Appointment and Governance

- **Principal Officer:** As a Sole Proprietor, I, **Shoeb Abdul Rahim Shaikh**, will act as the designated Principal Officer responsible for absolute AML compliance, monitoring transactions, and reporting directly to the **Financial Intelligence Unit - India (FIU-IND)**.

3. Client Due Diligence (CDD) Measures

Before providing research reports, model portfolios, or investment advice, I will perform complete verification:

- **No Anonymous Accounts:** I will not onboard anonymous clients, pseudonyms, or accounts with fictitious names.
- **Mandatory KYC:** Every individual client must provide a valid Permanent Account Number (PAN), Identity Proof, and Address Proof.
- **KRA Verification:** I will verify the authenticity of the client's credentials using SEBI-approved KYC Registration Agencies (KRAs).

4. Absolute Cash Prohibition

- **Digital-Only Transactions:** I will never accept cash payments for subscription fees or research services under any circumstances.
- **Bank Routing:** All payments must originate transparently from a verified bank account, credit/debit card, or official UPI gateway belonging to the registered client.

5. Risk Categorization & Special Categories (CSC)

Clients will be classified based on their risk profile to allocate screening priorities:

- **Low Risk:** Standard domestic retail investors with clear sources of legitimate income.

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- **Clients of Special Category (CSC):** Non-Resident Indians (NRIs), High Net-Worth Individuals (HNIs), Politically Exposed Persons (PEPs), and non-governmental organizations (NGOs). These clients will be subjected to **Enhanced Due Diligence (EDD)** and verified against United Nations Security Council (UNSCR) sanction lists.

6. Transaction Monitoring & Suspicious Reporting

I will regularly monitor incoming transactions for anomalies. I will file a **Suspicious Transaction Report (STR)** with FIU-IND within 7 days if a client:

Provides forged identity documents or alerts the KRA verification system.

- Demands to pay through cash or unexplained third-party accounts.
- Abruptly terminates a service subscription when asked to provide regular identity or financial background disclosures.

7. Preservation of Records

- I will securely maintain all client KYC files, transaction histories, receipts, and communication logs for a minimum period of **5 years** from the date the business relationship ends.

Date: 01-04-2026

Place: Jalgaon

SHOEB ABDUL RAHIM SHAIKH

PROPRIETOR OF WINVEST CAPITALS

Proprietor & Principal Officer