

Anti Money Laundering Policy (AML)

OF

JSEL Securities Limited.

Version December, 2017

Depository Participants- DP-ID-29200
CDSL
BSE Cash

Anti MoneyLaunderingPolicy

The Government of India has serious concerns over money laundering activities which are not only illegal but anti-national as well. As a market participant it is evident that strict and vigilant tracking of all transactions of suspicious nature required.

Accordingly the Company has laid down following policy guidelines:

Principal Officer: Miss Neha Goyal is appointed as the Principal Officer. She will be responsible for implementation of internal controls & procedures for identifying and reporting any suspicious transaction or activity to the concerned authorities.

Designated Director : Mr. Alok Nigam

Purpose & Scope: As a Financial Market Intermediary we need to maintain a record of all the transactions; the nature and value of which has been prescribed in the Rules under the PMLA. Accordingly all the back office, DP and trading staff are instructed to observe the following safeguards:

No Cash transactions for trading in securities shall be allowed from any client in the normal course of business.

Maintain a record of all the transactions; the nature and value of which has been prescribed in the Rules notified under the PMLA. Such transactions include:

Cash transactions of the value of more than Rs 10 lakhs or its equivalent in foreign currency.

All series of cash transactions integrally connected to each other which have been valued below Rs 10 lakhs or its equivalent in foreign currency where such series of transactions take place within one calendar month.

All suspicious transactions whether or not made in cash.

Frequent off Market transfers from one BO account to another shall be scrutinized and asked for. In absence of valid reason case or found suspicious, it shall be brought to the notice of Principal Officer.

Trading beyond ones declared income: The turnover of the clients should be according to their declared means of income. Any abnormal increase in client's turnover shall be reported to Principal Officer. The Back Office staff should take due care in updating the clients' financial details and shall periodically review the same.

Policies & Procedures:

Client Identification Procedure :

a) The 'Know your Client' (KYC) Policy:-

While establishing the intermediary – client relationship:

No account shall be opened unless all the KYC Norms as prescribed from time to time by the SEBI / Exchanges / **CDSL** are duly complied with, all the information as required to be filled in the KYC form (including financial information, occupation details and employment details) is actually filled in and the documentary evidence in support of the same is made available by the client. Moreover all the supporting documents should be verified with originals and client should sign the KYC & MCA in presence of our own staff and the client should be introduced by an existing clients or the known reference.

Obtaining sufficient information about the client in order to identify who is the actual beneficial owner of the securities or on whose behalf transaction is conducted .

Verify the customer's identity by using reliable , independent source , document , data or information such as SEBI banned entity list , www.watchoutinvestors.com , list of persons provided by CDSL , SEBI from time to time as suspicious person , list provided by the security council committee established pursuant to various united nations security council resolutions (UNSCRs) can be assessed at its website at <http://www.un.org/sc/comitees/1267/consolist.shtml>, <http://www.un.org/sc/committees/1988/list.shtml> .

Address must be verified by sending Welcome Letter / Statement of Account, and in case any document returned undelivered the client should be asked to provide his new address proof before doing any further transaction.

We must exercise additional due diligence in case of the Clients of Special Category which include but not limited to:-

- Non resident clients
- High networth clients (i. e the clients having networth exceeding 100 lakhs and doing the intra day trading volume of more than 5 Crore and daily delivery volume more than Rs 25Lakhs)
- Trust, Charities, NGOs and organizations receiving donations
- Companies having close family shareholdings or beneficial ownership
- Politically exposed persons (PEP) of foreign origin
- Current / Former Head of State, Current or Former Senior High profile politicians and connected persons (immediate family, Close advisors and companies in which such individuals have interest or significant influence)
- Companies offering foreign exchange offerings
- Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect, where there is unusual banking secrecy, Countries active in narcotics production, Countries where corruption (as per Transparency International Corruption Perception Index) is highly prevalent, Countries against which government sanctions are applied, Countries reputed to be any of the following – Havens / sponsors of international terrorism, offshore financial centers, tax havens, countries where fraud is highly prevalent.
- Non face to face clients
- Clients with dubious reputation as per public information available etc.
- Such Other persons who as per our independent judgment may be classified as CSC.

In case we have reasons to believe that any of our existing / potential customer is a politically exposed person (PEP) we must exercise due diligence, to ascertain whether the customer is a politically exposed person (PEP), which would include seeking additional information from clients and accessing publicly available information etc.

The dealing staff must obtain senior management's prior approval for establishing business relationships with Politically Exposed Persons. In case an existing customer is subsequently found to be, or subsequently becomes a PEP, dealing staff must obtain senior management's approval to continue the business relationship.

We must take reasonable measures to verify source of funds of clients identified as PEP.

The client should be identified by using reliable sources including documents / information and we should obtain adequate information to satisfactorily establish the identity of each new client and the purpose of the intended nature of the relationship.

The information should be adequate enough to satisfy competent authorities (regulatory / enforcement authorities) in future that due diligence was observed by the intermediary in compliance with the Guidelines. Each original documents should be seen prior to acceptance of a copy.

Failure by prospective client to provide satisfactory evidence of identity should be noted and reported to the higher authority.

While accepting a client the underlying objective should be to follow the requirements enshrined in the PML Act, 2002 SEBI Act, 1992 and Regulations, directives and circulars issued there under so that we are aware of the clients on whose behalf we are dealing.

All the KYC information is captured in the manner mentioned in the Rules, as per the KYC template for ' individuals' finalized by CRESAI for sharing with the CENTRAL KYC Records Registry.

In this regards, it is clarified that the requirement of Permanent Account Number (PAN) is mandatory for completing the KYC process.

The ' live run' of CKYCR has started with effect from July 15,2016 in a phased manner beginning with new 'individual accounts'.

All the KYC data is uploaded with CKYCR, in respect of all the individual accounts opened on or after August 1,2016, wherever KYC is required to be carried out as per the circulars issued by SEBI from time to time.

Functions and Obligations Of Depository Participant (DP) for Central KYC Registry(CKYCR) :

1. JSEL Securities Ltd. is registered with Central KYC Registry in accordance with the processes & instructions issued.
2. While commencing an account based relationship, we verify the identity of the customer & perform the initial due diligence of the customer.
3. Where a customer submits a KYC Identifier , such KYC records are downloaded from the CKYCR by using the KYC Identifier and the customer is not required to submit the documents again unless :
 - There is a change in the information of the customer as existing in the records of CKYCR.
4. The KYC data of a customer obtained from the Central KYC Registry (CKYCR) shall not be used for purposes other than verifying the identity or address of the client & shall not transfer KYC records or any other information contained therein to any third party unless authorized to do so by the client or by the Regulator or by the Director.

Policy for acceptance of clients:

The following safeguards are to be followed while accepting the clients:

No account is opened in a fictitious / benami name or on an anonymous basis. To ensure this we must insist the client to fill up all the necessary details in the KYC form in our presence and obtain all the necessary documentary evidence in support of the information filled in KYC. We must verify all the documents submitted in support of information filled in the KYC form with the originals and in- person verification should be done by our own staff. Moreover new client should either be introduced by an existing customer or by the senior official of the company. In case we have any doubt that in-complete / fictitious information is submitted by the client, we must ask for such additional information so as to satisfy ourselves about the genuineness of the client and the information of the client before accepting his registration.

We shall check whether the client's identity matches with any person having known criminal background or is not banned in any other manner , whether in terms of criminal or civil proceeding by any enforcement /regulatory agency worldwide .The CDD process shall necessarily be revisited when there are suspicions of Money Laundering or financing of terrorism (ML/FT) on annual basis. DP shall periodically update atleast one in a year all documents, data or information of all beneficial owners collected under the CDD process.

Risk based Approach : 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 & high risk clients . By classifying the clients , we will be in a 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 transaction , manner of payment etc . In order to achieve this objective , all clients of the DP should be classified in following category :

Category - A : Low Risk Client - The clients are those who pose low or nil risk . They are clients who have respectable social and financial standing . These are the clients who make payment on time and take delivery of shares .

Category - B : Medium Risk Client : Clients are those who are intra-day trading clients or speculative clients .

Category – C : High Risk Clients : Other than above two category clients and included clients of special category .

Any change in the risk profile of the clients has to be ascertained by concerning officials .

Factors of risk perception of the client:-

Particulars	Factor of	Risk
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Client of Special Categories as defined under Para	Special Categories	<u>VeryHigh Risk</u>
Direct Clients of other than Indore Region / Other States	Client`s Location	High Risk
Non-resident Clients (NRI)	Client`s Location	High
Payment through Banker`s Cheque / Demand Draft / Cash / Chq of other bank (own) not mapped	Manner of Making Payme	High Risk
HNI Clients (average daily turnover > Rs 50 Lakhs or net settlement obligation > Rs	Nature of Business	High Risk
Client Introduced by other Existing Clients	Client`s Location	Medium
Direct Clients of Region	Client`s Location	Medium
Payment through A/c payee cheque from the	Manner of Making	Medium

A/c other than one already mapped with us	Payment	
Professional persons like Doctors, Lawyers, CA/CS/ICWAI/Engineers	Nature of Business	Medium Risk
Retail clients (average daily turnover < Rs 25 Lakhs or net settlement obligation < Rs 5	Nature of Business	Medium Risk
Face to Face persons of Jaipur Region	Client`s Location	Low
Face to Face clients of other than Jaipur Region / Govt. /Defense Sector Employees	Client`s Location	Low Risk
Client Introduced by existing known working Clients	Client`s Location	Low Risk
Regular payment through A/c payee cheque the Bank A/c already mapped with us	Manner of Making	Low Risk
Retail clients (average daily turnover < Rs 10 Lakhs	Nature of Business	Low Risk

Ensure that no account is opened where we unable to apply appropriate clients due diligence measures / KYC policies. This shall be applicable in cases where it is not possible to ascertain the identity of the client or information provided by the client is suspected to be non genuine or perceived non co-operation of the client in providing full and complete information. We should not continue to do business with such a person and file a suspicious activity report. We should also evaluate whether there is suspicious trading in the account and whether there is a need to freeze or close the account.

Risk Assessment

i. DP shall carry out risk assessment to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk with respect to its clients, countries or geographical areas, nature and volume of transactions, payment methods used by clients, etc. The risk assessment shall also take into account any country specific information that is circulated by the Government of India and SEBI from time to time, as well as, the updated list of individuals and entities who are subjected to sanction measures as required under the various United Nations' Security Council Resolutions (these can be accessed at http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml and <http://www.un.org/sc/committees/1988/list.shtml>).

ii. The risk assessment carried out shall consider all the relevant risk factors before determining the level of overall risk and the appropriate level and type of mitigation to be applied by JSEL SEC. LTD . The assessment shall be documented, updated regularly and made available to competent authorities and self regulating bodies, as and when required.

CLIENT IDENTIFICATION PROCEDURE :

- A) JSEL Securities Limited shall proactively put in place appropriate risk management systems to determine whether their client or potential client or the beneficial owner of such client is a politically exposed person. Such procedures shall include seeking relevant information from the client, referring to publicly available information or accessing the commercial electronic databases of PEPS . Further the enhanced CDD measures as outlined in client identification procedure shall also applicable where the beneficial owner of a client is a PEP.
- B) JSEL Securities Limited to obtain senior management approval for establishing business relationships with PEPs. 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.
- C) JSEL Securities Limited also take reasonable measures to verify the sources of funds as well as the wealth of clients and beneficial owners identified as PEP.
- D) The client shall be identified by the us by using reliable sources including documents/information. The intermediary shall obtain adequate information to satisfactorily establish the identity of each new client and the purpose of the intended nature of the relationship.
- E) The information must be adequate enough to satisfy competent authorities (regulatory /enforcement authorities) in future that due diligence was observed by the intermediary in compliance with the directives. Each original documents shall be see prior to acceptance of a copy.
- F) Failure by prospective client to provide satisfactory evidence of identity shall be noted and reported to the higher authority with the intermediary.

Records / Information to be maintained

Company will maintain and preserve the following information in respect of transactions referred to in Rule 3 of PMLA Rules for the period of 10 years. Revised time period for maintaining & preserving the information / documents will be 08 years .

Client Registration Forms

Contract Note

The nature of the transactions;

The amount of the transaction and the currency in which it denominated;

The date on which the transaction was conducted; and

The parties to the transaction.

Records Keeping requirements :

The following document retention terms shall be observed :

- a) All necessary records on transactions, both domestic and international, shall be maintained at least for minimum period prescribed under the relevant Act and Rules (PMLA and rules framed there under as well SEBI Act) and other legislations, Regulations or exchange bye-laws or circulars.
- b) Records on client identification (e.g. copies or records of official identification documents like passports , identity cards, driving licenses or similar documents), account files and business correspondence shall also be kept for the same period.

Records of information reported to the Director, Financial Intelligence Unit-India (FIU-IND) :

We shall maintain and preserve the record of information related to transactions, whether attempted or executed, which are reported to the Director, FIU-IND, as required under Rules 7&8 of PML Rules, for a period of five years from the date of the transaction between the client and the intermediary..

Information to be Maintain :

JSEL Securities Limited are maintaining and preserve the following information in respect of transactions referred to in Rule 3 of PML Rules :

- I. The nature of the transactions;
- II. The amount of the transaction and the currency in which it is denominated;
- III. The dated on which the transactions was conducted ; and
- IV. The parties to the transaction.

While carrying out transactions for the client

RMS department should monitor the trading activity of the client and exercise due diligence to ensure that the trading activity of the client is not disproportionate to the financial status and the track record of the client.

Payments department should ensure that payment received form the client is being received in time and through the bank account the details of which are given by the client in KYC form and the payment through cash / bearer demand drafts should not be entertained.

Reliance on third party for carrying out Client due Diligence (CDD)

DP may rely on a third party for the purpose of (a) identification and verification of the identity of a client and (b) determination of whether the client is acting on behalf of a beneficial owner, identification of the beneficial owner and verification

of the identity of the beneficial owner. Such third party shall be regulated, supervised or monitored for and have measures in place for compliance with CDD and record-keeping requirements in line with the obligations under the PML Act. Such reliance shall be subject to the conditions that are specified in Rule 9 (2) of the PML Rules and shall be in accordance with the regulations and circulars/guidelines issued by SEBI from time to time.

Monitoring of transactions :

Regular monitoring of transactions is vital for ensuring effectiveness of the AML procedures.

The intermediary shall pay special attention to all complex, unusually large transactions / patterns which appear to have no economic purpose. The intermediary may specify internal threshold limits for each class of client accounts and pay special attention to transactions which exceeds these limits. The background including all documents/office records memorandums/clarifications sought pertaining to such transactions and purpose thereof shall also be examined carefully .

Further, the compliance cell of the intermediary shall randomly examine a selection of transactions undertaken by clients to comment on their nature i.e. whether they are in the nature of suspicious transactions or not.

High value transactions , Transactions originating from dormant account & alerts provided by CDSL will be checked by Principal officer . JSEL securities will take care of all those transaction which do not commensurate with Income range provided by BO . In such case JSEL securities will obtain updated income details from BO .

Suspicious transactions monitoring & Reporting :

A list of circumstances which may be in the nature of suspicious transactions is given below. This list is only illustrative and whether a particular transaction is suspicious or not will depend upon the background, details of the transactions and other facts and circumstances:

- a) Clients whose identity verification seems difficult or clients that appear not to cooperate
- b) Asset management services for clients where the source of the funds is not clear or not in keeping with clients apparent standing /business activity;
- c) Clients based in high risk jurisdictions;
- d) Substantial increases in business without apparent cause;
- e) Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
- f) Attempted transfer of investment proceeds to apparently unrelated third parties .

g) Unusual transactions by CSCs and businesses undertaken by offshore banks/financial services, businesses reported to be in the nature of export- import of small items.

Any suspicious transaction shall be immediately notified to the PRINCIPAL OFFICER or any other designated officer within the intermediary. The notification may be done in the form of a detailed report with specific reference to the clients, transactions and the nature /reason of suspicion.

However, it shall be ensured that there is continuity in dealing with the client as normal until told otherwise and the client shall not be told of the report/suspicion. In exceptional circumstances, consent may not be given to continue to operate the account, and transactions may be suspended, in one or more jurisdictions concerned in the transaction, or other action taken. The Principal Officer/Money Laundering Control Officer and other appropriate compliance, risk management and related staff members shall have timely access to client identification data and CDD information, transaction records and other relevant information.

As per AML policy categorizes clients of high risk countries, including countries where existence and effectiveness of money laundering controls is suspect or which do not or insufficiently apply FATF standards, as 'CSC'. Intermediaries are directed that such clients shall also be subject

to appropriate counter measures. These measures may include a further enhanced scrutiny of transactions, enhanced relevant reporting mechanisms or systematic reporting of financial transactions, and applying enhanced due diligence while expanding business relationships with the identified country or persons in that country etc.

List of Designated Individuals/Entities

An updated list of individuals and entities which are subject to various sanction measures such as freezing of assets/accounts, denial of financial services etc., as approved by the Security Council Committee established pursuant to various United Nations' Security Council Resolutions (UNSCRs) can be accessed at its website at <http://www.un.org/sc/committees/1267/consolist.shtml>. Registered intermediaries are directed to ensure that accounts are not opened in the name of anyone whose name appears in said list. Registered intermediaries shall 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. Full details of accounts bearing resemblance with any of the individuals/entities in the list shall immediately be intimated to SEBI and FIU-IND.

Procedure for 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 afor coping with terrorist activities was brought into effect through UAPA Amendment Act, 2008. JSEL Securities Limited will follow the directives of competent authorities for freezing of funds , financial assets or economic resources or related services.

New PMLA amendments - Aadhaar Details Submission :

MFIs/MFDs/RIAs are hereby informed that with reference to notification issued by Ministry of Finance (Dept. of Revenue) in consultation with RBI dated June 01, 2017 (Circular attached), amendments have been carried out to Prevention of Money Laundering (Maintenance of Records) Rules, 2005.

In pursuance to the amendment to the Rules, the following has been made mandatory.

- Where client is an individual who is eligible to be enrolled for Aadhaar, he / she shall submit the Aadhaar number issued by the UIDAI & PAN to the Reporting entity, i.e. AMC
- Where Aadhaar number has not been assigned to a client, the client shall furnish proof of application for enrolment of Aadhaar and in case the PAN is not submitted, one certified copy of an officially valid document shall be submitted
- If such individual client is not eligible to be enrolled for Aadhaar number, he / she shall for the purpose of the revised rule, submit to the Reporting entity, PAN or Form no. 60
- If the Client does not submit the PAN, he/she shall submit one certified copy of officially valid document containing details of identity, address and a Photograph
- Where the client is a non-individual, apart from the Constitution documents, Aadhaar numbers and PANs or Form 60 of Managers, Officers or Employees holding an attorney to transact on its behalf shall be submitted. If a person holding an authority to transact on behalf of such entity is not eligible to be enrolled for Aadhaar and does not submit the PAN, certified copy of an officially valid document shall be submitted

Policy for Recruitment of personal

The HR Department is instructed to cross check all the references and should take adequate safeguards to establish the authenticity and genuineness of the persons before recruiting. The department should obtain the following documents:

Photographs

Proof of address

Identity Proof

Proof of Educational Qualification

References

Retention of records

Records pertaining to staff details collected for recruitment shall be kept safely.

Employees' Training

Company adopted an ongoing employee training program so that the members of the staff are adequately trained in AML and CFT procedures. Training requirements have specific focuses for frontline staff, back office staff, compliance staff, risk management staff and staff dealing with new customers. It is crucial that all those concerned fully understand the rationale behind these guidelines, obligations and requirements, implement them consistently and are sensitive to the risks of their systems being misused by unscrupulous elements.

Investors Education

Implementation of AML/CFT measures requires back office and trading staff to demand certain information from investors which may be of personal nature or which have hitherto never been called for. Such information can include documents evidencing source of funds/income tax returns/bank records etc. This can sometimes lead to raising of questions by the customer with regard to the motive and purpose of collecting such information. There is, therefore, a need for the back office and trading staff to sensitize their customers about these requirements as the ones emanating from AML and CFT framework. The back office and trading staff should prepare specific literature/ pamphlets etc. so as to educate the customer of the objectives of the AML/CFT program.

Reporting to FIU

As per our observations if any transaction of suspicious nature is identified it must be brought to the notice of the Principal Officer who will submit report to the FIU if required

Above said policies are reviewed by us on annual basis to keep it updated as per the various amendments in the PMLA rules.

(Neha Goyal)
PMLA Officer

**JSEL Securities Limited
Stock Exchange Building,
JLN Marg, Malviya Nagar,
Jaipur-302017**

**REPLY TO SEBI LETTER DATED MAY 26, 2014. INFORMATION SUBMITTED FOR
THE PERIOD-April 01, 2011 till March 31, 2014**

1. Details of Compliance Officer

Mr. Vimal Gupta
Compliance Officer
Phone No. : 09314024282
e-mail : vimalg_jpr@yahoo.co.in
fax no. : 0141-2729008

2. AML policies and procedures followed by JSEL Securities Ltd. have not been placed before the Board till date and same will be put up in the next Board meeting. A copy of AML policy is enclosed as Annexure – 1.
3. The DP has communicated the AML policies and procedures to its sub-brokers. However, the communication will be provided shortly with AML policies to staff members. Enclosed at Annexure - 4
4. AML policies have not been reviewed by board till date and same will be review in the next Board meeting.
5. With respect to policy for acceptance of clients, the following is provided:
As per AML policy enclosed at Annexure – 1
6. With respect to client identification policy, the following is provided :
 - a. As per AML policy enclosed at Annexure – 1
 - b. No. of PEP accounts: NIL
 - c. As per AML policy enclosed at Annexure - 1
7. With respect to monitoring of transactions :
 - a. **Continuous monitoring of transactions:** JSEL Securities Ltd receives daily reports from CDSL for (i) high value transactions (above Rs. 5 Lakh) and (ii) suspicious transactions. Sample reports are enclosed at Annexure – 2. There are no other reports generated/monitored by JSEL Securities Ltd.
 - b. There were no suspicious transactions generated and observed during FY 2011-12, FY 2012-13 and FY 2013-14.
 - c. There were no suspicious transactions found and reported to FIU during FY 2011-12, FY 2012-13 and FY 2013-14.
8. Employees' Training: JSEL Securities Ltd has provided various training program related to DP operations and in these programs they give the awareness of AML from time to time. DP has not give a separate AML training to staff members and very soon DP will provide the same to the staff members.
9. Compliance department at JSEL Securities Ltd

S.No.	Name	Designation	Working in compliance
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			department since
1	Mr. Alok Nigam	Dy. General Manager	2007
2	Mr. Vimal Gupta	Compliance officer cum Manager (DP)	2009

10. Copy of reports of Internal Audit and Inspections conducted by stock exchanges or depositories during FY 2011-12, FY 2012-13 and FY 2013-14 are enclosed as Annexure - 3.

11. **Details of Principal Officer**

Mr. Vimal Gupta
Principal Officer

Mr. Alok Nigam, D.G.M. is his reporting officer.

Place: Jaipur

Date:

JSELS/2014/ 175

Dated 13th August, 2014

Director, FIU-IND,
Financial Intelligence Unit-India,
6th Floor, Hotel Samrat,
Chanakyapuri,
NEW DELHI – 110021

Dear Sir/Madam,

As per the requirement of PMLA Act, Mr. Alok Nigam, DGM is appointed as Designated Director of JSEL Securities Ltd. and authorized to comply with all the requirements of FIU-IND, as per the SEBI Circular ref. no. CIR/MIRSD/1/2014 dated 12.3.2014 on Anti Money Laundering, By Resolution passed by Circulation by the Board of Directors, dated 12/08/2014.

This is for your kind information.

Thanking you,

Yours faithfully,
for JSEL SECURITIES LTD.

(VIMAL GUPTA)
COMPLIANCE OFFICER

JSELS/2014/175

Dated 13th August, 2014

Mr. Krishnamurthy Iyer,
Principal Officer,
Central Depository Services (India) Ltd.,
Phiroze Jeejeebhoy Towers,
17th Floor, Dalal Street, Fort,

Mumbai – 400 001

Dear Sir,

Sub : Appointment of Designated Director Under PMLA

As per your communiqué No. 4309 dated 13.3.2014 with SEBI circular CIR/MIRSD/1/2014 dated 12.03.2014 advised to appoint a Designated Director Under PMLA Act , by Resolution passed by Circulation, by the Board of Directors dated 12/08/2014.

In this connection , we have appointed a Designated Director , the details are given below :

1. DP name &ID : JSEL Securities Ltd –DP ID-29200
2. Name of Designated Director : Mr. Alok Nigam
intimated to FIU
3. Email ID and contact details : nigam_alok12@hotmail.com
Of Designated Director Ph : 2729009,2729061
M : 9351355955
4. Date of Communication to FIU-IND : 13th August, 2014

Thanking you,

Yours faithfully,
for JSEL SECURITIES LTD.

(VIMAL GUPTA)
COMPLIANCE OFFICER

Enclosed : A coy of letter sent to FIU-IND