

SECUMAX Anti-Money Laundering (AML) Policy

1. Purpose SECUMAX is committed to preventing the use of its operations and resources for money laundering or terrorist financing. This policy outlines the framework for compliance with applicable anti-money laundering laws and regulations, ensuring ethical and transparent business practices.

2. Scope This policy applies to all employees, directors, contractors, agents, suppliers, and business partners associated with SECUMAX.

3. Policy Statement SECUMAX has a zero-tolerance approach to money laundering and terrorist financing. We are committed to:

- Complying with all relevant AML laws and regulations.
- Identifying and mitigating risks associated with money laundering.
- Promoting a culture of compliance and transparency.

4. Definitions

- **Money Laundering:** The process of concealing the origins of illegally obtained money by passing it through legitimate channels.
- **Terrorist Financing:** Providing funds or financial support to individuals or groups involved in terrorism.

5. Responsibilities

5.1. Management Management is responsible for:

- Establishing and maintaining the AML framework.
- Ensuring adequate resources for implementing AML measures.
- Providing oversight and support for compliance activities.

5.2. Employees Employees are required to:

- Familiarize themselves with this policy and relevant laws.
- Follow Whistle Blower Policy

5.3. Suppliers and Business Partners

Suppliers and business partners must:

- Comply with this policy and applicable AML laws.
- Provide information and cooperate during due diligence or audits.

6. Risk Assessment SECUMAX conducts regular risk assessments to identify and address potential money laundering risks, including:

- Evaluating business relationships and transactions.
- Screening customers, suppliers, and business partners for compliance risks.

7. Due Diligence SECUMAX implements due diligence measures, including:

- Verifying the identity of customers and business partners.
- Monitoring transactions for unusual or suspicious activities.
- Maintaining accurate and up-to-date records.

8. Reporting Suspicious Activities All employees are required to report suspicious activities or transactions promptly. Email ID: helpdesk@SECUMAX.in or Phone:

Contact: Venkatesh Bhaskar, Ashok HB or Shruthi Bhaskar KK

Reports will be treated with confidentiality and investigated thoroughly.

9. Training and Awareness SECUMAX provides training to employees and stakeholders to:

- Enhance understanding of AML regulations and company policies.
- Equip them to identify and report suspicious activities.

10. Monitoring and Review This policy will be reviewed annually or as necessary to ensure its effectiveness and compliance with evolving AML regulations.

11. Non-Compliance Violations of this policy will result in disciplinary action, up to and including termination of employment or contracts. SECUMAX may also report violations to relevant authorities.

12. Approval This policy has been approved by the SECUMAX Board of Directors and is effective as of [Insert Date].
