



# AML Policy

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**TRUSHNA EXIM**  
01/B Jariwala Compound, Sumul Diary Road, Surat

Policy No: TE/HO/HR/021

**Department:** Human Resource

### History of Revision:

Sr. No.	Date of Revision	Revision No.	Reason for Revision

The policies relating to this section are part of the Business Policies adopted by Trushna Exim and are presented below for reference:

- Trushna Exim recognizes the fact that entities in the Lab Grown Diamonds Manufacturing and Gems and Jewellery sector have to take on the onus of analysing their potential vulnerabilities to money laundering and implement specific steps that are required for protection against abuse by criminals.
- Strict compliance is required at all times, with all applicable national and, where appropriate, international laws / regulations with respect to money laundering, terrorism financing, bribery, corruption, smuggling, embezzlement, fraud, racketeering, transfer pricing and tax evasion.
- Trushna Exim shall act in accordance with national laws and national / international accounting standards with respect to maintaining financial accounts of all business transactions and auditing of its financial accounts.
- Trushna Exim ensures that concerned employees know and understand the relevant regulatory jurisdiction for national and international transactions, money laundering / financial offences related legal, regulatory and internal requirements as they apply to their jobs. Ignoring or not reporting suspicious activity that appears to be questionable may also be considered as a violation of the Business Policies, depending on the seriousness of the non-conformance.
- Trushna Exim implements a "Know your customer" and "Know your Supplier" procedure that establishes the identity of all organizations with which it deals, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious.

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HR Department	HR Department	COO/CEO	COO/CEO
			



- Trushna Exim apply high standards in the selection, screening and acceptance of suppliers and purchasers of rough and polished diamonds, ensuring anti-money laundering policies and procedures are adopted, mandating due diligence during the selection process, continued transaction monitoring and relevant and appropriate worker training.
- Financial auditors should be alerted to applicable national legislation imposing special anti-money laundering/combating the financing of terrorism compliance rules on dealers in precious stones or high value goods.
- Identification and verification of counterparties, by checking government-issued identification and government listings for money laundering, fraud, involvement in prohibited organisations and/or financing conflict.
- Monitoring transactions and report suspicious transactions to relevant authorities.
- Maintaining records for at least 5 years (or longer if required by national legislation).
- Maintain records of all single or apparently linked cash or cash-like transactions equal to the threshold defined by applicable law and, where required by law, implement a process to report such transactions to the relevant designated authority.

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