



ANTI MONEY LAUNDRING POLICY

Policy approved by	:	Board of Directors of Supriya Lifescience Limited
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Introduction

Supriya Lifescience Ltd (hereinafter referred to as "the Company") is committed to the highest standards of Anti-Money Laundering (AML) compliance and counter-terrorism financing (CTF). This policy outlines the Company's stance against money laundering activities and provides guidelines to ensure compliance with relevant laws and regulations.

Policy Objectives:

The objectives of this policy are to:

- Prevent the Company from being used as a conduit for money laundering and terrorist financing.
- Ensure compliance with all applicable AML laws and regulations.
- Establish procedures for detecting and reporting suspicious activities.
- Protect the integrity and reputation of the Company.

Scope of Policy:

This policy applies to all employees, directors, officers, and agents of the Company. It encompasses all Company activities, including interactions with customers, suppliers, and third parties.

Definitions:

- **Money Laundering:** The process of concealing or disguising the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.
- **Terrorist Financing:** The provision of funds for terrorist activities.
- **Suspicious Activity:** Any activity that deviates from the normal financial behaviour of a customer or business and may indicate money laundering or terrorist financing.

Regulatory Framework:

The Company will comply with all applicable AML/CTF laws and regulations, including but not limited to:

- The Prevention of Money Laundering Act (PMLA), 2002.
- Financial Action Task Force (FATF) Recommendations.
- Relevant guidelines issued by regulatory authorities.

Key Principles:

Risk-Based Approach:

The Company will adopt a risk-based approach to AML compliance, identifying and assessing the money laundering and terrorist financing risks associated with its business activities and taking appropriate measures to mitigate those risks.

Customer Due Diligence (CDD)

The Company will conduct thorough CDD on all customers, suppliers, and third parties. This includes:

- Identifying and verifying the identity of customers.
- Understanding the nature and purpose of the business relationship.
- Monitoring transactions for suspicious activities.

Record Keeping:

The Company will maintain detailed records of all transactions and CDD measures for a minimum period of five years, as required by law.

Reporting:

Employees must report any suspicious activities to the management at whistleblower@supriyalifescience.com in without delay. The management is then responsible for investigating and, if necessary, reporting the activity to the relevant authorities.

Training and Awareness:

The Company will provide regular AML training to all relevant employees to ensure they understand their obligations and can recognize and report suspicious activities.

Customer Due Diligence (CDD) Procedures:**Identification and Verification**

- Obtain and verify the identity of all customers using reliable, independent source documents, data, or information.
- For legal entities, understand the ownership and control structure.

Risk Assessment:

- Assess the risk profile of each customer based on factors such as the nature of the business, geographical location, and transaction patterns.
- Apply enhanced due diligence (EDD) measures for high-risk customers.

Ongoing Monitoring:

- Continuously monitor customer transactions to ensure they are consistent with the customer's risk profile and expected activities.
- Investigate and report any unusual or suspicious activities.

Reporting Suspicious Activities (Internal Reporting)

- Employees must report any suspicious activity to the management immediately.
- The AMLCO (Anty money Laundering committee) will review the report and, if necessary, escalate it to senior management and the relevant authorities.

External Reporting

- The AMLCO is responsible for filing Suspicious Transaction Reports (STRs) with the Financial Intelligence Unit (FIU) or other relevant authorities, as required by law.

Training and Awareness

- All employees will receive AML training at the time of hiring and periodically thereafter.
- Training will cover relevant laws and regulations, the Company's policies and procedures, and how to recognize and report suspicious activities.

Record Keeping

- Maintain records of all transactions, CDD information, and reports of suspicious activities for at least five years.
- Ensure records are easily retrievable and available to relevant authorities upon request.

Compliance and Monitoring:

- The AMLCO will oversee the implementation of this policy and ensure ongoing compliance with AML/CTF regulations.
- Regular audits and reviews will be conducted to assess the effectiveness of the AML program and identify areas for improvement.

Penalties for Non-Compliance:

- Non-compliance with this policy may result in disciplinary action, including termination of employment. The Company will cooperate fully with regulatory and law enforcement authorities in the investigation of any non-compliance.

Review of Policy:

This policy will be reviewed and updated annually or as required to ensure it remains effective and compliant with current laws and regulations.

	Reviewed by:	Approved by:
Name	Krishna Raghunathan	Dr. Saloni Wagh
Designation	Chief Financial Officer	Managing Director
Signature		
Date:		