



**BERAR FINANCE LIMITED**  
**POLICY ON KNOW YOUR CUSTOMER (KYC) / ANTI**  
**MONEY LAUNDERING (AML) MEASURES**

**RECORD OF REVIEW:**

Document Number	01
Revision Number	07
Document Classification	External
Originally formulated	June 22, 2015
Created by	Secretarial Department
Reviewed by	Risk Management Committee
Approved by	Board of Directors of the Company

<b><u>Version No</u></b>	<b><u>Created/Modified Date</u></b>	<b><u>Created/modified by</u></b>	<b><u>Approved by</u></b>
1	June 22, 2015	Secretarial Department	Board of Directors
2	March 19 , 2016	Secretarial Department	Board of Directors
3	March 27, 2017	Secretarial Department	Board of Directors
4	May 18, 2018	Secretarial Department	Board of Directors
5	May 19, 2021	Secretarial Department	Board of Directors
6	June 29, 2021	Secretarial Department	Board of Directors
7	April 28, 2022	Secretarial Department	Board of Directors

## Policy on Know Your Customer and Anti-Money Laundering Measures

### Table of Contents

Sr. No	Contents	Pg. No.
1	Introduction	4
2	Objective	4
3	Applicability	4
4	Definitions	4
5	Compliance of KYC Policy	5
6	Key Elements	5
7	Customer Acceptance Policy (CAP)	5
8	Customer Identification Procedure (CIP)	6
9	Customer Education	7
10	Monitoring of Transaction	7
11	Risk Management	8
12	Risk Categorization	8
13	Money Laundering and Terrorist Financing Risk Management	8
14	Identification	9
15	Verification	9
16	Maintenance of Records of Transactions & Identity	9
17	Preservation of Records	10
18	Central KYC Registry ( CKYCR)	10
19	Enhanced due diligence	10
20	Appointment of Designated Director / Principal Officer	11
21	Reporting Requirements to Financial Intelligence Unit – India (FIU-IND)	11
22	Confidentiality of Information	11
23	Hiring of Employees and Employee Training	12
24	Investors / Lenders KYC	12
25	Amendment	12
Annexure I	Indicative list for Risk Categorisation	13
Annexure II	Customer Identification Procedure – KYC documents that may be obtained from Lenders/investors & depositors	14

## Policy On Know Your Customer (KYC) / Anti Money Laundering (AML) Measures

### 1. Introduction

The "Know Your Customer" ("KYC") guidelines issued by the Reserve Bank Of India ("RBI") (RBI /DBR/2015-16/18 Master Direction DBR.AML.BC.No.81/14.01.001/2015-16 dated February 25, 2016) as updated from time to time aims at preventing Non-Banking Finance Companies ("NBFCs") from being used intentionally or unintentionally by criminal elements for committing financial frauds, transferring or deposits of funds derived from criminal activity or for financing terrorism. Accordingly, in compliance with the guidelines issued by RBI regularly, the Policy on Know Your Customer (KYC)/ Anti-Money Laundering (AML) Measures ("Policy") of Berar Finance Limited ("Company") is hereby formulated and approved by its Board of Directors ("Board").

### 2. Objectives

The Policy has been framed with the following objectives;

- a. To put in place an effective system and procedure for customer identification and verifying its / his / her identity and residential address.
- b. To prevent the Company from being used, intentionally or unintentionally, for Money Laundering or Terrorist Financing activities.
- c. To enable the Company to know/understand its customers and their financial dealings better; this in turn is expected to help manage associated risks prudently.
- d. To put in place appropriate controls for detection and reporting of suspicious activities in accordance with applicable laws/laid down procedures.

### 3. Applicability

This Policy is applicable to all products offered by the Company and all its offices and branches. This Policy is also applicable to all persons who are acting as agents of the Company.

### 4. Definitions

- a. **"Aadhaar number"** shall have the meaning assigned to it in clause (a) of section 2 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 (18 of 2016).
- b. **"Account"** includes Deposits as well as borrowings by and from the Company.
- c. **"Act"** and **"Rules"** means the Prevention of Money-Laundering Act, 2002 and the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005, respectively and amendments thereto. Together the Act and the Rules are referred to as PMLA.
- d. **"Beneficial Owner"** is any natural person(s) who ultimately owns or controls a client and/or the person(s) on whose behalf the transaction is being conducted and includes a person who exercises ultimate effective control over a juridical person.
- e. **Customer:** For the purpose of this Policy, a "customer" will include the following:
  - A person or entity who is engaged in financial transaction or activity with the Company and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting (i.e., the beneficial owner);
  - Beneficiaries of transactions conducted by professional intermediaries such as stock-brokers, Company Secretaries, Chartered Accountants, Solicitors etc. as permitted under the law; or
  - Any person or entity connected with a financial transaction which can pose significant reputation or other risks to the Company. e.g., a wire transfer or issue of a high value demand draft as a single transaction.
- f. **"Customer Due Diligence" or "CDD"** means identifying and verifying the Customer and the Beneficial Owner.
- g. **"Customer identification"** means undertaking the process of CDD.
- h. **"Designated Director"** means a person designated by the Regulated Entity to ensure overall compliance with the obligations imposed under chapter IV of the Act and the Rules.
- i. **"Money Laundering"** is the process by which criminals attempt to hide and disguise the true origin and ownership of the proceeds of their criminal activities, thereby

avoiding prosecution, conviction and confiscation of the criminal funds. The term “Money Laundering” is also used when the funds are used for terrorist financing, though the origin of the funds may be legitimate.

- j. **“Officially Valid Document” (“OVD”)** means either of the following:
- i. Passport;
  - ii. Driving license;
  - iii. Proof of possession of Aadhaar number. Where the customer submits his proof of possession of Aadhaar number as an OVD, he may submit it in such form as are issued by the Unique Identification Authority of India (“UIDAI”);
  - iv. Voter's Identity Card issued by the Election Commission of India;
  - v. Job card issued by NREGA duly signed by an officer of the State Government; or
  - vi. Letter issued by the National Population Register containing details of name and address.
- k. **“Non-face-to-face customers”** means customers who open accounts without visiting the branch/offices of the Regulated Entity/Entities or meeting the officials of a Regulated Entity.
- l. **“Principal Officer”** means an officer nominated by the Regulated Entity responsible for furnishing information as per rule 8 of the Rules.
- m. **“Suspicious transaction”** means a transaction as defined below, including an attempted transaction, whether or not made in cash, which, to a person acting in good faith:
- i. gives rise to a reasonable ground of suspicion that it may involve proceeds of an offence specified in the Schedule to the Act, regardless of the value involved; or
  - ii. appears to be made in circumstances of unusual or unjustified complexity; or
  - iii. appears to not have economic rationale or bona-fide purpose; or
  - iv. gives rise to a reasonable ground of suspicion that it may involve Terrorist Financing.
- n. **“Terrorist financing”** is the financing of terrorist acts, terrorists and terrorist organisations.

## 5. Compliance of KYC Policy

The Company's senior management team comprising of respective vertical heads (oversee KYC compliance in line with the Policy. The Internal Audit team shall on a continuous basis conduct an independent evaluation of adherence to KYC compliance requirements and submit audit notes and report on compliance to Audit Committee on quarterly basis. The Company will ensure that decision-making functions of determining compliance with KYC norms are not outsourced.

## 6. Key Elements

KYC procedures also enable the Company to know/understand its Customers and their financial dealings better which in turn help to manage its risks prudently. We have framed the Policy incorporating the following four key elements:

- Customer Acceptance Policy (“CAP”);
- Customer Identification Procedures (“CIP”);
- Monitoring of Transactions; and
- Risk management.

## 7. Customer Acceptance Policy (“CAP”)

The Company's CAP lays down criteria for acceptance of customers. The Company will:

- Ensure no account is opened in anonymous or fictitious *benami* name(s);
- Ascertain the volume of turnover, social and financial status, etc. to enable categorization of customers into low, medium and high risk (these customers will require very high level of monitoring). Currently given the size of the loans and type of customers the Company deals with, all its customers are considered low risk;
- Ensure documentation requirements and other information collected in respect of different categories of customers (Risk Categorisation as per Annexure I) are commensurate with the perceived risk and keeping in mind the requirements of Act and guidelines issued from time to time by the RBI;
- Verify the identity and /or obtain documents required as per the risk categorization and the Company will refuse to process a loan account/accept a deposit where the

prospective Customer does not co-operate with the Company in providing these details or where the Company is not sure about the reliability of the data furnished by the prospective Customer;

- Take adequate steps to ensure that the identity of the Customer does not match with any person with known criminal background or with banned entities such as individual terrorists or terrorist organizations, sanctioned persons;
- Prepare the profile for new and existing Customers which are based on risk categorization. The customer profile contains information relating to the Customer's identity, social/financial status, nature of business activity, information about his clients' business and their location, etc. The nature and extent of due diligence will depend on the risk perceived by the Company. However, the seeking of such information will not be intrusive, and the Company will not use such confidential information for cross selling or any other purposes.
- Ensure circumstances, in which a Customer is permitted to act on behalf of another person/entity, will be clearly spelt out in conformity with the established law and practices, as there could be occasions when an account is operated by a mandate holder or where an account may be opened by an intermediary in a fiduciary capacity.
- Conduct necessary checks (e.g. sanctions list issued by RBI), before opening a new account to ensure that the identity of the Customer does not match with any person with known criminal background or with banned entities such as individual terrorists or terrorist organizations or whose name appear in it .
- Assign a Unique Customer Identification Code ("**UCIC**") while entering relationships with new Customers as also for the existing Customers by the Company. The Company shall apply the customer due diligence ("**CDD**") procedure at the customer level.

If the Company is unable to apply appropriate KYC measures due to non-furnishing of information and /or non-cooperation by the Customer, it may consider terminating the business relationship after issuing due notice to the Customer explaining the reasons for taking such a decision. Such decisions being taken by vertical heads after consulting the Principal Officer.

The intent of the Policy is not to result in denial of financial services to public, who are financially or socially disadvantaged. While carrying out due diligence, the Company will ensure that the procedure adopted does not result in denial of services to any genuine Customer.

The Company shall carry out full scale CDD before opening an account. When the identity of the account holder is not known, the Company shall file Suspicious Transaction Reporting ("**STR**").

#### **8. Customer Identification Procedure ("**CIP**")**

Customer identification means identifying the Customer and verifying his/her/its identity by using reliable, independent source documents, data or information.

The Company obtains the necessary information to establish the identity of each new Customer, whether regular or occasional and the purpose of the intended nature of relationship. The identification procedure is carried out at different stages, i.e. while establishing a relationship, carrying out a financial transaction or when the Company has a doubt about the authenticity or the adequacy of the previously obtained customer identification data.

The CIP will be done through an introductory reference from an existing customer with a satisfactorily conducted loan account or a person known to the Company and based on documents provided by the Customer or through staff members knowing the potential Customer or any other authorized document for identification and proof of residence.

An effective CIP is an important part of the effort by the Company to know its Customers. The Company's CIP is integrated into the AML (Anti Money Laundering) program for the Company in terms of the **PMLA**, which contains provisions requiring the business processes to:

- Verify the identity of any Person transacting with the Company to the extent reasonable and practicable;
- Maintain records of the information used to verify a Customer's identity, including name, address and other identifying information and

- Consult Sanctions Lists/ Financial Actions Task Force (“**FATF**”) /Office of Foreign Control Assets (“**OFAC**”) databases for known or suspected terrorists or terrorist organizations / jurisdictions and countries that do not or insufficiently apply the FATF recommendations as provided to the Company by RBI or any other applicable government agency to determine whether a person opening an account or an existing customer appears on any such list.

The Company will perform appropriate, specific and where necessary, Enhanced Due Diligence on its Customers that is reasonably designed to know and verify their true identity and to detect and report instances of criminal activity, including Money Laundering or Terrorist Financing. The procedures, documentation, types of information obtained and levels of KYC due diligence to be performed will be based on the level of risk associated with the relationship (products, services, business processes, geographic locations) between the Company and the customer and the risk profile of the customer. The Company will carry out ‘Money Laundering (ML) and Terrorist Financing (TF) Risk Assessment’ exercise periodically to identify, assess and take effective measures to mitigate money laundering and terrorist financing risk for clients, geographic areas, products, services, transactions or delivery channels, etc. The internal risk assessment carried out by the Company should be commensurate to its size, geographical presence, complexity of activities/structure, etc. and shall apply a Risk Based Approach for mitigation and management of the identified risks. The risk assessment processes shall be reviewed periodically to ensure its robustness and effectiveness.

#### **Customer Profile**

For the purpose of exercising due diligence on individual transactions in accounts, a ‘Customer Profile’ of individual Customers is included in the loan application or deposit opening form. The customer profile will contain information relating to the Customer’s identity, social/ financial status, information about the Customer’s clients’ business and their location etc. The information will be of two types namely mandatory and optional as stated below:

##### **(a) Mandatory Information:**

(i) Identity (ii) Address (iii) Occupation (iv) Source of funds (v) Monthly Income (vi) Annual turnover (vii) Date of Birth (viii) Dealings with other banks (ix) Assets (approximate value).

##### **(b) Optional Information:**

(i) Marital Status; (ii) Educational Qualification; (iii) Details of spouse; (iv) Details regarding children; (v) Other Information which can include queries on a) Car/two-wheeler ownership, b) has a credit card c) has an insurance policy.

The Company shall, where its Customer submits a proof of possession of Aadhaar Card containing Aadhaar Number, ensure redacts or blacks out of his Aadhaar number is done through appropriate means.

#### **9. Customer Education**

The Company will take adequate measures to educate the Customers on the objectives of the KYC programme, especially at the time of obtaining sensitive or personal information from the Customers. When required to collect any information about the Customer for the purpose other than KYC requirement, it will not form part of the loan application or deposit opening. Such information will be collected separately, purely on a voluntary basis in a form prescribed by the Company after explaining the objective to the Customer and taking the Customer’s express approval for the specific uses to which such information could be used. The customer servicing staff is specially trained to handle such situations while dealing with Customers. The Company takes care to see that implementation of the KYC guidelines in respect of customer acceptance, identification etc. do not result in denial of opening of new loan or deposit accounts to public.

#### **10. Monitoring Transactions**

Ongoing monitoring is an essential element of effective KYC procedures. The Company effectively controls and reduces the risk through understanding of the normal and reasonable activity of the Customer and by it having the means of identifying transactions that fall outside the regular pattern of activity. However, the extent of monitoring will depend on the risk sensitivity of the account. The different departments should pay special attention to all complex, unusually large transactions and all unusual patterns which have no apparent

economic or visible lawful purpose. High-risk accounts will be subjected to intensify monitoring.

The Company has put in place an appropriate mechanism to throw alerts when the transactions are inconsistent with risk categorization and updated profile of Customers.

**Illustrative list of activities which is construed as suspicious transactions**

- Activities not consistent with the Customer's business, i.e. accounts with large volume of credits whereas the nature of business does not justify such credits.
- Any attempt to avoid reporting/record-keeping requirements/provide insufficient/suspicious information:
  - A Customer who is reluctant to provide information needed for a mandatory report, to have the report filed or to proceed with a transaction after being informed that the report must be filed.
  - Any individual or group that coerces/induces or attempts to coerce/induce the Company employee from not filing any report or any other forms.
- Certain employees of the Company arousing suspicion:
  - An employee whose lifestyle is beyond his/her economic means
  - Negligence of employees/willful blindness is reported repeatedly.
- Multiple accounts under the same name.
- Refusal to furnish details of source of funds by which initial contribution is made, sources of funds is doubtful etc.
- There are reasonable doubts over the real beneficiary of the loan.
- Frequent requests for change of address.

**11. Risk Management**

The Company's internal audit and compliance functions have an important role in evaluating and ensuring adherence to the KYC policies and procedures. The compliance function provides an independent evaluation of the Company's policies and procedures, including legal and regulatory requirements. The Company ensures that its audit machinery is staffed adequately with individuals who are well-versed in such policies and procedures.

Concurrent/ Internal Auditors will specifically check and verify the application of KYC procedures and comment on the lapses observed in this regard. The compliance in this regard is put up before the Audit Committee of the Board at quarterly intervals.

**12. Risk Categorisation**

The Company shall periodically update Customer Identification data after the transaction is entered. The periodicity of updation of Customer Identification data shall be at least once in ten years for low-risk category customers, at least once every eight years for medium risk customers and at least once in two years in case of high-risk category customers. One recent photograph of the individual customer is to be obtained. Fresh photographs shall be obtained in case of minor customer on becoming major. All the Customers under different product categories are categorized into low, medium and high risk based on their profile. The credit team while appraising the transaction and rendering its approval, prepares the profile of the Customer based on risk categorization. Based on the credit appraisal, Customer's background, nature and location of activity, country of origin, sources of funds, client profile, etc., where the Credit team believes that a particular Customer falling under a category mentioned below is in his judgment falling in a different category, he may categorise the customer so, so long as appropriate justification is provided in the customer file. The Credit executive while appraising the transaction and rendering his approval will prepare the profile of the customer based on risk categorization. An indicative categorization for guidance is provided in **Annexure I**.

**13. Money Laundering and Terrorist Financing Risk Assessment**

- a. The Company shall carry out 'Money Laundering (ML) and Terrorist Financing (TF) Risk Assessment' exercise periodically to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk.
- b. The assessment process 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. While preparing the internal risk assessment, the Company shall take cognizance of the



overall sector-specific vulnerabilities, if any, that the regulator/supervisor may share from time to time.

- c. The risk assessment by the Company shall be properly documented and be commensurate to the nature, size, geographical presence, complexity of activities/structure, etc. of the Company.
- d. The outcome of the exercise shall be put up to the Risk Management Committee on a quarterly basis and will be available to competent authorities and self-regulating bodies.

The Company shall apply a Risk Based Approach (“**RBA**”) for mitigation and management of the identified risk and should have Board approved policies, controls and procedures in this regard. Further, the Company shall monitor the implementation of the controls and enhance them if necessary.

#### **14. Identification**

All customers shall be identified by a unique identification code. This unique code will be employed to track the facilities availed, monitor financial transactions which assists in risk profiling of customers. The customer (borrower’s) identification requirement is detailed in the Lending Policy. The customer identification requirement applicable to Lenders / investors and depositors are detailed in Annexure II to this policy

#### **15. Verification**

As a part of the Lending Policy the Company documents and implemented appropriate risk-based procedures designed to verify that it can form a reasonable belief that it knows the identity of its Customers (Borrower’s). Verification of customer identity should occur before transacting with the Customer. The Company describes the acceptable methods of verification of customer identity, which includes verification through documents, non-documentary verification methods or *additional verification procedures* that are appropriate with the associated risks, which are explained below;

##### ***I. Verification through documents:***

These documents may include but are not limited to the list of documents that can be accepted as proof of identity and address from customers by the Company as provided in the Lending Policy. The customer identification requirement applicable to Lenders / investors and depositors are detailed in Annexure II to this policy

The Company also accepts physical Aadhaar card / letter issued by UIDAI containing details of name, address and Aadhaar number received through post is also accepted as an OVD.

##### ***II. Verification through non-documentary methods:***

The Company depends on other methods of verification as listed below:

1. Contacting or visiting a Customer;
2. Independently verifying the Customer’s identity through the comparison of information provided by the customer with information obtained from a consumer reporting agency, public database, or other source; or
3. Checking references with other financial institutions.

##### ***III. Additional verification procedures.***

The Business Head advises the credit team to make a personal visit to address under the following situations.

1. A person is unable to present an unexpired government-issued identification document that bears a photograph or similar safeguard;
2. The sales executive is not familiar with the documents presented;
3. Where the sales executive is otherwise presented with circumstances that increase the risk that it will be unable to verify the identity of a Customer through documents; and
4. If the sales executive cannot verify the identity of a Customer that is other than an individual, it may be necessary to obtain information about persons with authority or control over such account, including signatories, to verify the customer’s identity.

#### **16. Maintenance of Records of Transactions & Identity**

The Company has a system of maintaining proper record of transactions prescribed under Rule 3, of the Rules and value of transactions, the procedure and manner of maintaining and

verification and maintenance of records of the identity of the clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005, as mentioned below:

- All cash transactions of the value of more than Rupees Ten lakhs or its equivalent in foreign currency;
- All series of cash transactions integrally connected to each other which have been valued below Rupees Ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds Rupees Ten lakhs;
- All cash transactions, where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place
- All suspicious transactions whether or not made in cash and by way of as mentioned in the Rules.

As per the RBI guidelines, the Company maintains the following information in respect of transactions referred to in Rule 3 of the Rules:

- Nature of the transactions;
- Amount of the transaction and the currency in which it was denominated;
- Date on which the transaction was conducted; and
- Parties to the transaction.

#### **17. Preservation of Records**

The Company has a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

#### **18. Central KYC Registry (“CKYCR”)**

The Company will ensure that the Customer KYC information is shared with the CKYCR in the manner mentioned in the RBI Directions in RBI’s KYC templates prepared for ‘Individuals’ and ‘Legal Entities’ with Central Registry of Securitization Asset Reconstruction and Security Interest of India (“**CERSAI**”).

As per the directions NBFCs shall upload the KYC data pertaining to all new individual accounts opened on or after from April 1, 2017 with CERSAI in terms of the provisions of the Prevention of Money Laundering (Maintenance of Records) Rules, 2005.

#### **19. Enhanced Due Diligence**

Enhanced Due Diligence will involve closely monitoring the account, frequently updating KYC documents, field investigation or visiting the customer, etc., which forms part of the credit policies of the businesses.

The Company is primarily engaged in small ticket size loans. It does not deal with such category of Customers who could pose a potential high risk of Money Laundering, Terrorist Financing or political corruption and therefore warrant enhanced scrutiny. The Lending Policy of the Company in respect of its various businesses ensures that the Company is not transacting with such high-risk customers.

However, if the Company has Customers or accounts that are determined to pose a potential high risk and thereby warrant enhanced scrutiny then it shall conduct Enhanced Due Diligence in connection with such Customers. The Company has established appropriate standards, methodology and procedures for conducting Enhanced Due Diligence, which shall involve conducting appropriate additional due diligence or investigative actions beyond what is required by standard KYC due diligence. Enhanced Due Diligence shall be coordinated and performed by the Company.

The following are the indicative list where the risk perception of a Customer which is considered higher:

- Customers requesting for frequent change of address/contact details;
- Sudden change in the loan account activity of the customers; or
- Frequent closure and opening of loan accounts by the customers.

In case of sale of repossessed vehicles by company to purchasers/brokers, company shall ensure to collect the KYC (Identity & address proof) so as to ensure the real identity of the buyer of such repossessed vehicles. Company shall obtain a declaration from the buyer that vehicles are being sold by the Company on ‘As is Where Is’ basis and the buyer is responsible to ensure the name transfer in RTO Records and deletion of the Company’s hypothecation

thereon. This ensures Company / its original customers is not accountable for repossessed vehicles being used for terrorist or any other unlawful activities.

The Company obtains End Use Declaration letter from customers confirming the purpose of finance taken and a declaration that the Facility shall not be used for any illegal and / or anti-social and / or speculative purposes including but not limited to participation in stock markets / IPOs.

## **20. Appointment of Designated Director & Principal Officer**

The Board of the Company will appoint the Designated Director, to ensure overall compliance with the obligations under the Act and Rules from time to time. The name, designation and address of the Designated Director have been communicated to the FIU-IND. In no case, the Principal Officer shall be nominated as the 'Designated Director'.

Mr. Sandeep Jawanjil, Managing Director is the Designated Director who is responsible for ensuring overall compliance as required under PMLA Act.

Mr. Rahul Lonkar, Head Accounts & Liabilities, is designated as Principal Officer who shall be responsible for furnishing of information to FIU-IND. As per the RBI guidelines, the Principal Officer is based out of its corporate office and is responsible for monitoring and reporting of all transactions and sharing of information as required under the law. He maintains a close liaison with enforcement agencies, other NBFCs and any other institution which are involved in the fight against money laundering and combating financing of terrorism.

## **21. Reporting Requirements to Financial Intelligence Unit - India (FIU-IND)**

The Company shall furnish the following reports to the Financial Intelligence Unit-India (FIU-IND), with regard to information referred to in Rule 3 of the Rules and in terms of Rule 7 thereof in the manner so specified and within the timelines prescribed therein;

- a. Cash Transactions Report ("CTR")
- b. Suspicious Transactions Report ("STR")

The Company is registered with FIU-IND with registration number of FINBF00068. The Company submits CTR monthly and STR on identification of such transaction with FIU-IND.

The Company has implemented a system not to accept any cash of more than Rs. 2 lakhs from its borrowers. Hence, it normally does not and would not have large cash transactions. However, when cash transactions of Rs. 10 lakhs and above are undertaken, the Company will maintain record of all such cash transactions in a separate register at its corporate office.

The Company monitors transactions of a suspicious nature on an ongoing basis for the purpose of reporting it to the appropriate authorities. The extent of monitoring by the Company depends on the risk sensitivity of the account and special attention is given to all complex unusually large transactions, which have no apparent economic or lawful purpose. The Company shall promptly report such high value cash transactions or transactions of a suspicious nature to the appropriate regulatory and investigating authorities. The Company has a system which alerts inconsistent transactions and profile of the customers is updated for effective identification and reports of suspicious transactions.

## **22. Confidentiality Of Information**

Information collected from Customers for the purpose of opening of account shall be treated as confidential and in accordance with the agreement/terms and conditions signed by the Customers. The information collected from Customers shall not be divulged for the purpose of cross selling, or for any other purpose without the express permission of the Customer. While considering the requests for data/information from Government and other agencies, the Company shall satisfy that the information being sought is not of such a nature as will violate the provisions of the laws relating to secrecy in their transactions.

The exceptions to the said rule shall be as under:

- a. Where disclosure is required under law;
- b. Where there is a duty to the public to disclose such information ;
- c. Such disclosure is required in the interest of the Company; and
- d. Where the disclosure is made with the express or implied consent of the Customer.

### **23. Hiring of Employees and Employee Training**

The Company shall have adequate screening mechanism as an integral part of personnel recruitment / hiring process and should have an ongoing employee training programs so that members of the staff are adequately trained in KYC/AML/CFT procedures. Training requirements shall have different focuses for front line staff, compliance staff and officer/staff dealing with new customers so that all concerned fully understand the rationale behind the KYC policies and implement them consistently.

### **24. Investor / Lenders KYC Policy**

The Company strives to provide excellent service to its Customers. It provides easy access to information regarding its services and ensure timely disclosures of financial as well as non-financial material information. Grievances are resolved in a timely, efficient, and fair manner, and processes are promptly initiated to prevent recurrence.

The Company's guidelines pertaining to four Key elements viz. customer acceptance policy, customer identification procedures, monitoring of transactions and risk management of this KYC framework, mentioned in this Policy will be equally applicable for its Investors / Lenders with suitable modifications depending upon the activity undertaken. The Company shall ensure that a proper framework on KYC and anti-money laundering standards are put in place in this regard. Basic KYC shall be completed through details like Certificate of Incorporation, PAN, TIN, GST etc. All funding proposals will be subject to proper checks on OFAC/ FATF / UN Sanctions List circulated by RBI / List of Willful defaulters / Other List of Terrorist Organizations.

The FATF periodically identifies jurisdictions with weak measures to combat money laundering and terrorist financing (AML/CFT) in its following publications:

- i) High-Risk Jurisdictions subject to a Call for Action, and
- ii) Jurisdictions under Increased Monitoring.

In compliance of RBI's Circular regarding Investment in NBFCs from FATF non-compliant jurisdictions dated February 12, 2021, the Company promotes investments from FATF compliant jurisdiction, i.e. from entities whose name does not appear in the aforementioned lists. Records of such checks shall be maintained.

### **25. Amendment**

The Board reserves the right to amend (either in whole or in part), suspend or rescind this Policy at any time. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to all in writing or placed on the Company's website. Whilst, the Company has made best efforts to define detailed procedures for implementation of this Policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such instances or ambiguities will be resolved in line with the broad intent of the Policy. The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance. The Board shall also review this policy on a periodic basis and at least once every year and shall notify the Customers, lenders, investors, Employees, Directors & other stakeholders in case of any changes to this Policy.

## Annexure I

### Indicative list for Risk Categorization

#### Low Risk Category:

Individuals (other than High Net Worth) and entities whose identities and sources of wealth can be easily identified. Transactions in accounts of a known profile, shall be categorised as low risk.

Illustrative examples are:

- Salaried employees whose salary structure is well-defined;
- People belonging to lower economic strata of the society whose accounts show small balances and low turnover;
- Government departments and Government-owned companies; or
- Statutory bodies & Regulators.

#### Medium & High Risk Category:

Customers that are likely to pose a higher-than-average risk may be categorized as medium or high risk depending on customer's background, nature and location of activity, country of origin, source(s) of funds and client profile etc.

Illustrative examples of medium risk category customers are:

- Non-Resident customers;
- High Net worth Individuals;
- Trust, charities, NGO's and Organization receiving donations;
- Companies having close family shareholding or beneficial ownership; or
- Firms with 'sleeping partners'.

Illustrative examples of high risk category customers are:

- Politically Exposed Persons (PEPs) of Indian/Foreign Origin;
- Non-face-to-face customers;
- Customers with suspicious/questionable reputation as per information available in the public domain; or
- Accounts of bullion dealers and jewelers.

## Annexure II

Customer Identification Procedure – KYC documents that may be obtained from Lenders/investors & depositors

Nature of customer	List of applicable documents
Individual	<p>The Company shall obtain the following from an individual while establishing an account based relationship or while dealing with the individual who is a beneficial owner, authorised signatory or the power of attorney holder related to any legal entity:</p> <p>a) a certified copy of any OVD containing details of his identity and address; and  b) the Permanent Account Number (PAN) or Form no.60; and  c) One recent photograph  d) Such other documents as specified by the Company from time to time.</p> <p>List of OVDs:</p> <p>i) Passport  ii) Driving license  iii) Proof of possession of Aadhaar number  iv) Voter’s identity card issued by the Election Commission of India  v) Job card issued by NREGA duly signed by an officer of the State Govt.  vi) Letter issued by the National Population Register containing details of name and address.</p> <p>Provided that:</p> <p>1) where the customer submits his proof of possession of Aadhaar number as an OVD, he may submit it in such form as are issued by the UIDAI  2) where the OVD furnished by the customer does not have updated address, the following documents shall be deemed to be OVDs for the limited purpose of proof of address:-</p> <p>i) utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill);  ii) property or Municipal tax receipt;  iii) pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings, if they contain the address;  iv) letter of allotment of accommodation from employer issued by State Govt. or Central Govt. Departments, statutory or regulatory bodies, public sector undertakings, scheduled commercial banks, financial institutions and listed companies and leave and licence agreements with such employers allotting official accommodation</p> <p>The Credit Head of The Company has the power to approve the following documents in lieu of ID and address proof.</p> <p><b>In lieu of Identity proof</b></p> <p>✓ Notarized copy of Marriage certificate with the applicant photograph.</p> <p>Explanation: A document shall be deemed to be an OVD even if there is a change in the name subsequent to its issuance provided it is supported by a marriage certificate issued by the State Government or Gazette notification, indicating such a change of name</p> <p><b>In lieu of address proof</b></p> <p>✓ Rental agreement along with rent receipt and utility bill of the Landlord.  ✓ In case the customer has a temporary address being a transit arrangement provided by real estate builder – Allotment letter issued by the builder + permanent address proof  ✓ In deserving cases where there is no address proof for one of the applicants or guarantors, an affidavit signed by a close relative</p>

	<p>(only in case of spouse, parents or children) confirming that the co applicant / guarantor is staying together in the same address.</p> <p>3. The Credit Head of The Company jointly with the concerned Sales Head has further delegated the approval powers to accept the above documents to credit managers, as they may deem fit and necessary, in this regard.</p> <p>4. In the event of any genuine reason for non-availability of any of the prescribed documents or to approve any deviations for change in the documents prescribed under this policy, the Credit Head jointly with the Sales Head considers approving any other document not stated above based on the product, market requirements and also on the merits of the case.</p> <p><b>Identification number:</b></p> <p>1. A taxpayer identification number; passport number and country of issuance; letter issued by Unique Identification Authority of India containing AADHAAR number; or number and country of issuance of any other government issued document evidencing nationality or residence and bearing a photograph or similar safeguard. When opening an account for a person (other than an individual) that does not have an identification number, the business process must request alternative government issued documentation certifying the existence of the business or enterprise;</p> <p>2. For a customer who has applied for, but has not received an identification number, loan may be sanctioned, but business process has implemented procedures to confirm that the application was filed before the loan is sanctioned to customer and to obtain the identification number within a reasonable period before disbursement of loan.</p> <p><i>The Company also ensures that all the customers namely applicant, co applicants and guarantor has valid ID proof as prescribed above</i></p> <p>The Credit Head of The Company has the power to approve the following document in lieu of ID and address proof</p> <p>✓ <i>A Certificate from the public authority (i.e) Gazette Officer of State or Central Govt./Magistrate/MRO/VRO/Gram Panchayat Sarpanch/notary public.</i></p>
Companies	<ol style="list-style-type: none"> <li>1. Certificate of Incorporation, Memorandum of Association and Articles of Association</li> <li>2. Resolution of the Board of Directors to open an account and identification of those who have the authority to operate the account.</li> <li>3. Power of Attorney granted to its managers, officers or employees to transact business on its behalf</li> <li>4. PAN Allotment Letter</li> <li>5. Telephone Bill</li> </ol>
Partnership Firms/ LLPs	<ol style="list-style-type: none"> <li>1. Registration Certificate if the partnership deed is registered</li> <li>2. Power of Attorney granted to a partner or an employee of the firm to transact business on its behalf</li> <li>3. Any official valid documents identifying the partners and the persons holding the power of attorney and their addresses</li> <li>4. Telephone bill in the name of firm/partners Accounts</li> </ol>
Proprietary Concerns	<ol style="list-style-type: none"> <li>1. Proof of the name, address and activity of the concern like registration certificate (in case of a registered concern)</li> <li>2. Certificate issued by the Municipal authorities under the Shops and Establishment Act, GST returns, Income Tax returns, GST Certificate, Registration documents issued by GST, Professional Tax Authorities, Certificate of Practice issued by Food and Drug Control Authorities etc.</li> <li>3. Any registration documents issued in the name of the proprietary</li> </ol>

	<p>concern by the central government, state government. We also accept IEC (import-export code issued to the proprietary concern by the office of DGFT as an identity document for opening of account.</p> <ol style="list-style-type: none"><li>4. Income Tax return copy in the name of the sole proprietor where the firm's income is reflected duly authenticated by the Income Tax Authorities</li><li>5. Utility bills such as electricity, water, and landline telephone bills in the name of the proprietary concern</li></ol> <p>Any two of the above documents would suffice. These documents should be in the name of the proprietary concern</p>
--	--