

Know Your Customer' (KYC) & Anti Money Laundering (AML) Policy

Company: ART Climate Finance (India) Private Ltd

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1. Introduction

In terms of the guidelines issued by the Reserve Bank of India (RBI) on 'Know Your Customer' (KYC) Guidelines-Anti Money Laundering Measures for Non-Banking Financial Companies (NBFCs) and master directions issued by it from time to time, the Board of Directors of ART Climate Finance (India) Private Ltd ("Company") has adopted and approved Policy on the "Know Your Customer [KYC] & Anti Money Laundering [AML]" to set a standard for prevention of money laundering activities and to follow certain customer identification procedure for opening of account while dealing with the customers. This policy is applicable across all branches of the Company and be read in coordination with guidelines/instruction issued in this regard from time to time. The Company is always committed for transparent and fair dealing with customers and other stakeholders ensuring adherence to applicable laws. Through this Policy, the Company stands committed to:

- a. Accepting only those clients whose identity is established by conducting due diligence appropriate to the risk profile of the customer.
- b. Recording and preserving audit trail for the transactions conducted by Customers to facilitate investigation.
- c. Reporting to the Financial Intelligence Unit any designated agency, the details of transactions of clients if and when requested or as may be suggested by such agencies.
- d. Cooperating with investigating agencies / law enforcement agencies in their efforts to trace money laundering transactions and persons involved in such transactions.

2. Confidentiality and Consent

Information collected from the customer for the purpose of opening of account shall be kept confidential and the Company shall not divulge any details thereof for cross selling or any other purposes. Information sought from the customer shall be relevant to the perceived risk, shall not be intrusive, and shall be in conformity with the guidelines issued by RBI from time to time. Any other information from the customer shall be sought separately with his/ her/ its consent and after opening the account.

3. Objective

The objective of the KYC policy is to prevent the Company from being used, intentionally or unintentionally, by criminal elements for money laundering activities. KYC procedures also enable the Company to know/ understand its customers and their financial dealings better, which in turn help the Company to manage its risks prudently. The Company has framed its KYC policy incorporating the following four key elements:

- (i) Customer Acceptance Policy;
- (ii) Customer Identification Procedures;
- (iii) Monitoring of Transactions/ On-going Due Diligence; and
- (iv) Risk Management.

4. Definitions

For the purpose of the KYC policy:

- a) "**Beneficial Owner**" refers to the natural person(s) who ultimately owns or controls a customer and/ or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

- b) **“Customer”** means a person that engages in a financial transaction or activity with the Company/ NBFCs and includes a person on whose behalf the person that engages in the transaction or activity is acting.
- c) **“Customer Due Diligence (CDD)”** means identifying and verifying the customer and the beneficial owner using ‘Officially Valid Documents’ as a ‘proof of identity’ and ‘proof of address’.
- d) **“Designated Director”** means a person designated by the NBFC to ensure overall compliance with the obligations imposed under Chapter IV of the PML Act and the Rules and shall include Managing Director or a whole time director, duly authorized by the Board of Directors of the Company.
- e) **“Officially valid document (OVD)”** means the passport, the driving license, the Permanent Account Number (PAN) Card, the Voter’s Identity Card issued by the Election Commission of India, job card issued by NREGA duly signed by an office of the State Government, letter issued by the Unique Identification Authority of India containing details of name, address and Aadhaar number.
- f) **“Politically Exposed Persons (PEPs)”** are:
 - (i) individuals who are or have been entrusted with prominent public functions domestically or by a foreign country, e.g., Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials;
 - (ii) international organization PEPs who are or have been entrusted with a prominent function by an international organization, refers to members of senior management or individuals who have been entrusted with equivalent functions, i.e., directors, deputy directors and members of the board or equivalent functions, and
 - (iii) family members related to PEP either directly (consanguinity) or through marriage or similar (civil) forms of partnership; and
 - (v) close associates are individuals who are closely connected to a PEP, either socially or professionally.
- g) **“Principal Officer”** means an officer designated by the Company
- h) **“Suspicious Transaction”** as determined by the Rules notified under the PMLA means a 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 the proceeds of crime; or
 - ii. appears to be made in circumstances of unusual or unjustified complexity; or
 - iii. appears to have no economic rationale or bonafide purpose

5. Customer Acceptance Policy (CAP)

The criteria for acceptance of customers are as follows:

- (i) No account shall be opened in anonymous or fictitious/ benami name(s);
- (ii) No transaction or account based relationship will be undertaken without following the Customer Due Diligence (CDD) procedure.
 - a. The mandatory information to be sought for KYC purpose while opening an account and during the periodic updates as specified, should be obtained.
 - b. ‘Optional’/additional information is obtained with the explicit consent of the customer after the account is opened.
 - c. CDD procedure is followed for all the joint account holders while opening a Joint Account.
- (iii) Circumstances, in which a customer is permitted to act on behalf of another person/entity, should be clearly spelt out in conformity with the established law 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 the fiduciary capacity;

- (iv) Parameters of risk assessment in terms of the customers' identity, social/ financial status, nature of business activity, information about the clients' business and their locations, etc. have been defined to enable categorization of customers into low, medium and high risk.

While considering customer's identity, the ability to confirm identity documents through online or other services offered by issuing authorities or other entities may also be factored in documentation requirements and other information to be collected in respect of different categories of customers depending on perceived risk and keeping in mind the requirements of PML Act, 2002 and guidelines issued by the RBI from time to time;

- (v) The Company shall not open an account where it is unable to apply appropriate CDD measures, i.e., the Company is unable to verify the identity and /or obtain documents required as per the risk categorisation due to non-cooperation of the customer or non-reliability of the data/information furnished to the Company. It may, however, be necessary to have suitable built in safeguards to avoid harassment of the customer. For example, decision to close an account may be taken at a reasonably high level after giving due notice to the customer explaining the reasons for such a decision;

- (vi) Before opening a new account, necessary screening will be performed so as 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 appears in the lists circulated by RBI/ SEBI/ IRDA.

The Company shall prepare a profile for each new customer based on risk categorization, as provided subsequently in this policy. The customer profile will be a confidential document and details contained therein shall not be divulged for cross selling or any other purposes.

- (vii) For the purpose of risk categorization, individuals (other than High Net Worth Individuals) and entities whose identities and sources of wealth can be easily identified and transactions in whose accounts by and large conform to the known profile, may be categorized as low risk. In such cases, only the basic requirements of verifying the identity and location of the customer are to be met. Customers that are likely to pose a higher than average risk to the company shall be categorized as medium or high risk depending on customer's background, nature and location of activity, country of origin, sources of funds and client profile etc. The Company shall apply enhanced due diligence measures based on the risk assessment, thereby requiring intensive 'due diligence' for higher risk customers, especially those for whom the sources of funds are not clear. Examples of customers requiring enhanced due diligence shall include (a) high net worth individuals, (b) trusts, charities, NGOs and organizations receiving donations, (c) companies having close family shareholding or beneficial ownership, (d) firms with 'sleeping partners', (e) Politically Exposed Persons, (f) non-face to face customers, and (g) those with dubious reputation as per public information available, etc.

The adoption of customer acceptance policy and its implementation should not become too restrictive and must not result in denial of financial facility to members of the general public, especially those, who are financially or socially disadvantaged.

6. Customer Identification Procedure (CIP)

Customer Identification Procedure to be carried out at different stages as under:

- Commencement of an account-based relationship with the customer;
- When the Company has a doubt about the authenticity or adequacy of the customer identification data obtained by the Company. Customer identification means identifying

the customer and verifying his/ her/ its identity by using reliable, independent source documents, data or information; and

- Carrying out a financial transaction.
- a) The Company shall obtain sufficient information necessary to establish, to its satisfaction, the identity of each new customer, whether regular or occasional, and the purpose of the intended nature of business relationship. Being satisfied means that the Company should be able to satisfy the competent authorities that due diligence was observed based on the risk profile of the customer, in compliance with the extant guidelines in place. Besides risk perception, the nature of information/documents required would also depend on the type of customer (individual, corporate, etc.). For customers that are natural persons, the Company shall obtain sufficient identification data to verify the identity of the customer, his/ her address/ location, and also his/ her recent photograph. For customers that are legal persons or entities, the Company shall (i) verify the legal status of the legal person/ entity through proper and relevant documents; (ii) verify that any person purporting to act on behalf of the legal person/entity is so authorized and identify and verify the identity of that person; and (iii) understand the ownership and control structure of the customer and determine who are the natural persons who ultimately control the legal person.

Customer identification requirements in respect of a few typical cases, especially, legal persons requiring an extra element of caution, are given in **Annexure - I**. If the Company accepts such accounts in terms of the Customer Acceptance Policy, the Company shall take reasonable measures to identify the beneficial owner(s) and verify his/ her/ their identity in a manner so that it is satisfied that it knows who the beneficial owner(s) is/are.

An indicative list of the nature and type of documents/information that shall be relied upon for customer identification is given in the KYC Documentation Policy annexed as **Annexure-II**.

- b) The Company shall ensure that decision-making functions of determining compliance with KYC norms shall not be outsourced.
- c) Introduction shall not be sought while opening accounts.
- d) The Company shall not ask the customer to furnish an additional OVD, if the OVD submitted by the customer for KYC contains both proof of identity and proof of address. Further, the customer shall not be required to furnish separate proof of address for permanent and current addresses, if these are different. The Company shall obtain a declaration from the customer about her/ his local address on which all correspondence will be made by the Company, in the event the proof of address furnished by the customer is the address where the customer is currently residing.

The Company shall allot Unique Customer Identification Code (UCIC) to all their customers while entering into any new relationships.

7. Appointment of Principal Officer

The company has designated the Company Secretary as the Principal Officer for due compliance of its AML measures. S/he will act as a central reference point in facilitating onward reporting of suspicious transactions and for playing an active role in the identification and assessment of potentially suspicious transactions. The duties of the Principal Officer will include monitoring the company's compliance with AML obligation and overseeing maintenance of AML records, communication and training for employees. The Principal Officer will ensure filing of necessary reports with the Financial Intelligence

Unit (FIU-IND). Principal Officer is authorized to issue additional circulars and advisories, to and seek information from the concerned officials for due compliance of AML measures from time to time.

8. Monitoring of Transactions/ On-going Due Diligence

- a) The Company shall pay special attention to all large and complex transactions including RTGS transactions, and those with unusual patterns, inconsistent with normal and expected activity of the customer, which have no apparent economic rationale or legitimate purpose.
- b) The Company shall prescribe threshold limits for specific categories of accounts and pay particular attention to the transactions which exceed prescribed thresholds, based on income and / or net worth of the customer.
- c) Currently, no cash transactions are done by the Company, since all disbursements and repayments are made through normal banking channels only. However, should it ever be necessary to operate cash, transactions that involve large amounts of cash inconsistent with the normal and expected activity of the customer should particularly attract the attention of the company. Very high account turnover inconsistent with the size of the balance maintained may indicate that funds are being 'washed' through the account.
- d) High-risk accounts shall be subjected to intensify monitoring and enhanced due diligence. The Company shall set key indicators for such accounts, taking note of the background of the customer, such as the country of origin, sources of funds, the type of transactions involved and other risk factors. The Company shall put in place a system of periodical review of risk categorization of accounts, with such periodicity being at least once in 6 (six) months and the need for applying enhanced due diligence measures.
- e) The records of transactions in the accounts shall be preserved and maintained as required in terms of section 12 of the PML Act, 2002. The Company shall report the transactions of suspicious nature and/ or any other type of transaction notified under section 12 of the PML Act, 2002, to the or appropriate law enforcement authority.
- f) While currently, no cash transactions are undertaken, in the unforeseen event of such transactions taking place, the Company will maintain a proper record of all cash transactions (deposits and withdrawals) of Rs.10 lakh and above. The internal monitoring system shall have an inbuilt procedure for reporting of such transactions and those of suspicious nature to controlling/ head office on a fortnightly basis.

9. Reporting to Financial Intelligence Unit –India

As per the PMLA rules, Principal Officer is required to report information relating to cash and suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND) at the following address:

Director, FIU-IND,
Financial Intelligence Unit-India, 6th Floor, Hotel Samrat, Chankyapuri,
New Delhi – 110 021.
Website: <http://fiuindia.gov.in>

The suspicious transactions shall be reported through electronic filing of Suspicious Transactions Report.

10. Risk Management

- a) Through this policy, the Board of Directors of the Company is ensuring the formal documentation of its KYC programme. The management will establish appropriate procedures to ensure its effective implementation.
- b) The Company's internal audit and compliance functions have an important role in evaluating and ensuring adherence to the KYC policies and procedures. As a general rule, the compliance function would provide an independent evaluation of the Company's own policies and

procedures, including legal and regulatory requirements. The audit machinery shall be staffed adequately with individuals who are well-versed in such policies and procedures. The Internal Auditors shall specifically check and verify the application of KYC procedures and comment on the lapses observed in this regard. The compliance in this regard shall be put up before the Audit Committee of the Board on quarterly intervals.

- c) The Company shall have an ongoing employee training programme so that the members of the staff are adequately trained in KYC and AML procedures. Training requirements shall have different focuses for frontline staff, compliance staff and staff dealing with new customers. It is crucial that all those concerned fully understand the rationale behind the KYC policy and implement the same consistently.

11. Customer Education

Implementation of KYC procedures requires the Company to demand certain information from customers, which may be of personal nature or which have hitherto never been called for. This can sometimes lead to a lot of questioning by the customer as to the motive and purpose of collecting such information. The Company shall prepare specific literature/ pamphlets etc. so as to educate the customer of the objectives of the KYC programme. The front desk staff shall be specially trained to handle such situations while dealing with customers.

12. Introduction of New Technologies

The Company shall pay special attention to any money laundering threats that may arise from new or developing technologies that might favour anonymity, and take measures, if needed, to prevent its use in money laundering schemes.

13. Review of KYC for the Existing Accounts

- a) The Company shall also apply this policy to the existing customers on the basis of materiality and risk. Moreover, transactions in existing accounts shall be continuously monitored and any unusual pattern in the operation of the account shall trigger a review of the CDD measures.
- b) The Company shall consider applying monetary limits to such accounts based on the nature and type of the account. All the existing accounts of companies, firms, trusts, charities, religious organizations and other institutions are subjected to minimum KYC standards which would establish the identity of the natural/legal person and those of the 'beneficial owners'.
- c) Where the Company is unable to apply appropriate KYC measures due to non-furnishing of information and/ or non-cooperation by the customer, the Company shall consider closing the account or terminating the business relationship after issuing due notice to the customer explaining the reasons for taking such a decision. Such decisions shall be taken at a reasonably senior level.
- d) The Company shall carry out periodic updations at least once in every 2 years for high risk customers, once in every 8 years for medium risk customers and once in every 10 years for low risk customers, subject to the following conditions:
 - Fresh proofs of identity and address shall not be sought at the time of periodic updation, from low risk customers, when there is no change in status of their identities and addresses and a self-certification to that effect is obtained;
 - certified copy of the proof of address forwarded by 'low risk' customers through mail/ post, etc. in case of change of address shall be acceptable;
 - physical presence of low risk customer at the time of periodic updations shall not be insisted upon; and

- time limits prescribed above would apply from the date of opening of the account/ last verification of KYC.

14. Applicability to branches and subsidiaries outside India

The policy shall also apply to the branches (if any) and majority owned subsidiaries located abroad (if any), especially, in countries which do not or insufficiently apply the FATF Recommendations, to the extent local laws permit. When local applicable laws and regulations prohibit implementation of these guidelines, the same would be brought to the notice of the RBI.

15. Record Management

In order to maintain, preserve and report the customer account information, with reference to provisions of PML Act and Rules, the Company shall:

- 1) maintain all necessary records of transactions between the Company and the customer for at least 5 (five) years from the date of transaction;
- 2) preserve the records pertaining to the identification of the customers and their addresses obtained while opening the account and during the course of business relationship for at least 5 (five) years after the business relationship is ended;
- 3) make available the identification records and transaction data to the competent authorities upon request;
- 4) introduce a system of maintaining proper record of transactions prescribed under Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005;
- 5) maintain all necessary information in respect of transactions prescribed under PML Rule 3 as to permit reconstruction of individual transaction, including the nature, amount and date of transaction and the parties to the transaction;
- 6) evolve a system for proper maintenance and preservation of account information in a manner that allows easy and quick retrieval of data whenever required or requested by the competent authorities; and
- 7) maintain records of identity and address of the customers and records in respect of transactions referred to in PML Rule 3 in hard or soft format.

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

The Company shall maintain confidentiality of information as provided in Section 45NB of RBI Act 1934.

Where the customer already has a Central KYC (CKYC) 14 digit acknowledgement number, his / her documents need not be obtained again. Documents relating to identification and address can simply be downloaded from the CKYC website <https://testbed.ckycindia.in/ckyc/index.html>. However, loan agreements and finance related documents will still need to be signed/ provided by the customer.

Details / documents collected by the Company also need to be uploaded into the CKYC website within 3 (three) days of the commencement of the relationship.

ANNEXURE – I: Customer Identification Requirements – Indicative Guidelines

Trust/Nominee or Fiduciary Accounts:

There exists the possibility that trust/nominee or fiduciary accounts can be used to circumvent the customer identification procedures. The Company should determine whether the customer is acting on behalf of another person as trustee/ nominee or any other intermediary. If so, the Company shall insist on receipt of satisfactory evidence of the identity of the intermediaries and of the persons on whose behalf they are acting, as also obtain details of the nature of the trust or other arrangements in place. While opening an account for a trust, the Company shall take reasonable precautions to verify the identity of the trustees and the settlers of trust (including any person settling assets into the trust), grantors, protectors, beneficiaries and signatories. Beneficiaries shall be identified when they are defined. In the case of a 'foundation', steps should be taken to verify the founder managers/ directors and the beneficiaries, if defined. The identification of beneficial owner(s) shall include identification of the author of the trust, the trustee, the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.

Accounts of companies and firms:

The Company shall be vigilant against business entities being used by individuals as a 'front' for maintaining accounts with the Company. The Company shall examine the ultimate beneficial ownership and control structure of the entity, determine the source of funds and identify the natural persons who have a controlling interest and who comprise the management. These requirements shall be moderated according to the risk perception e.g. in the case of a public company it will not be necessary to identify all the shareholders.

Client accounts opened by professional intermediaries:

- 1) When the Company has knowledge or reason to believe that the customer account opened by a professional intermediary is on behalf of a single customer, that the customer must be identified.
- 2) The Company may hold 'pooled' accounts managed by professional intermediaries on behalf of entities like mutual funds, pension funds or other types of funds. However, the Company shall not open accounts of such professional intermediaries, viz., lawyers/chartered accountants or stockbrokers, who are bound by any customer confidentiality that prohibits disclosure of the customer details to the Company.
- 3) Where funds held by the intermediaries are not co-mingled at the Company and there are 'subaccounts', each of them attributable to a beneficial owner, all the beneficial owners must be identified. Where such funds are co-mingled, the Company shall still look through to the beneficial owners.
- 4) Where the Company rely on the CDD done by an intermediary, they should satisfy themselves that the intermediary is regulated and supervised and has adequate systems in place to comply with the KYC requirements for the customers.

Accounts of Politically Exposed Persons (PEPs) (includes a PEP is the beneficial owner):

- 1) The Company should gather sufficient information including information about the sources of funds accounts of family members and close relatives, on any person/customer of this category intending to establish a relationship and check all the information available on the person in the public domain.
- 2) The Company shall verify the identity of the person and seek information about the sources of funds before accepting the PEP as a customer.
- 3) The decision to open an account for PEP should be taken at a senior level in accordance with the Customer Acceptance Policy of the Company.

- 4) The Company shall also subject such accounts to enhanced monitoring/ due diligence on an ongoing basis.
- 5) The Company shall obtain the approval of senior management in the event of an existing customer or the beneficial owner of an existing account subsequently becoming a PEP, to continue the business relationship.
- 6) The Company shall ensure the applicability of CDD measures to PEPs including enhanced monitoring on an on-going basis.

Accounts of non-face-to-face customers:

- 1) In the case of non-face-to-face customers, apart from applying the usual customer identification procedures, there shall be specific and adequate procedures to mitigate the higher risk involved.
- 2) Certification of all the documents presented shall be insisted upon and, if necessary, additional documents shall be called for. In such cases, the company shall also require the first payment to be effected through the customer's account with any bank which, in turn, adheres to similar KYC standards.
- 3) In the case of cross-border customers, there is the additional difficulty of matching the customer with the documentation and the Company may have to rely on third party certification/introduction. In such cases, it shall be ensured that the third party is a regulated and supervised entity and has adequate KYC systems in place.

ANNEXURE – II: KNOW YOUR CUSTOMER (KYC) DOCUMENTATION POLICY

PURPOSE:

The purpose of this document is to establish Know Your Customer (KYC) documentation policy for the Company. All the loans originated by the Company would follow this KYC documentation policy.

BACKGROUND:

This KYC documentation policy will enable us to make changes in only one document which will be followed by all products/businesses and will standardize the KYC documentation policy throughout the organization.

Documentation requirements have been laid down for each client type. The basic documents are the minimum required by law for AML and KYC for identification and address. Additional documents are those that provide details of a customer's sources of income, beneficial ownership (in the case of entities) and bank account(s) for transacting with the Company:

INDIVIDUAL:

S/N.	KYC Document	Id Proof	Address Proof
1.	PAN Card **	Acceptable	Not Acceptable
2.	Driving license	Acceptable	Acceptable
3.	Valid Passport	Acceptable	Acceptable
4.	Voter's ID Card	Acceptable	Acceptable
5.	Job card issued by NREGA duly signed by an officer of the State Government	Acceptable (If carries Photograph)	Acceptable (If carries Photo & Address)
6.	The letter issued by the Unique Identification Authority of India containing details of name, address and Aadhaar number **	Acceptable	Acceptable
7.	Certificate of Marriage issued by State government or Gazette notification indicating change in name together with certified copy of Officially Valid document in existing name of individual.	Acceptable	Acceptable
8.	Relative's Official valid document *	Not Acceptable	Acceptable
9.	Utility Bill(s) like electricity, water and landline telephone Bills not older than last two months	Not Acceptable	Acceptable
10.	Bank Statement not older than last two months	Not Acceptable	Acceptable

Additional Documents (Individual):

S/N.	Document Name	Remarks
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1	RTGS Letter/Disbursement request	Format available in LAS booklet
2	Original Cancelled cheque	Of the bank account where the loan is to be disbursed
3	Last 2 FY Income Tax Return (ITR) copies alongwith Computation of Income or Latest Networth Certificate issued by a Chartered Accountant or Latest Audited Balance Sheet.	
4	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than 1 year old) where last FY ITR is showing as a loss or where ITR is not available	
5	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies alongwith latest net-worth certificate copy duly certified by Chartered Accountant or Latest Audited Balance Sheet ,

NOTE:

*1) Relative as defined under section 2 (77) of the Companies Act, 2013 read with Rule 4 of the Companies (Specification of definitions details) Rules, 2014. A declaration from the relative that the said person is a relative and staying with him/her shall be obtained.

2) The e-KYC service of Unique Identification Authority of India (UIDAI) shall be accepted as a valid process for KYC verification under the PML Rules.

3) Documents can be downloaded from the CKYC website where the customer provides a 14 digit CKYC number.

**4) Where the client is an individual, who is eligible to be enrolled for an Aadhaar number, he/ she shall have to mandatorily submit (a) the Aadhaar number issued by the Unique Identification Authority of India, and (ii) PAN or Form No. 60 as defined in the Income-tax Rules, 1962 pursuant to the PMLA (Maintenance of Records) Second Amendment Rules, 2017 dated June 1, 2017.

Provided that where an Aadhaar number has not been assigned to a client, the client shall furnish proof of application of enrolment for Aadhaar and in case the PAN is not submitted, one certified copy of an OVD shall be submitted.

(4A) Where the client is an individual, who is not eligible to be enrolled for an Aadhaar number, he shall for the purpose of sub-rule (1), submit to the reporting entity, the PAN or Form No. 60 as defined in the Income-tax Rules, 1962:

Provided that if the client does not submit the PAN, he shall submit one certified copy of an OVD containing details of his/ her identity and address, one recent photograph and such other documents including in respect of the nature or business and financial status of the client as may be required by the Company.

NON-INDIVIDUALS:**Proprietorship –**

Category	KYC Document
Proprietorship	A) Certified copy of the individual (proprietor) containing details of identity and address be obtained (as per 'Individual table' given above). These need to be attested by the Proprietor with the stamp of the business entity.

	<p>B) Any two of the following documents in the name of the proprietary concern need to be obtained as proof of business/activity.</p> <ol style="list-style-type: none"> 1. Proof of the name, address and activity of the concern, like registration certificate, certificate/license issued by the Municipal authorities under Shop & Establishment Act, Bank Statement (not older than last two months), sales and income tax returns, CST / VAT/ GSTIN certificate, certificate / registration document issued by Sales Tax / Service Tax / Professional Tax authorities, IEC (Importer Exporter Code) issued by the DGFT office/ License/certificate of practice issued in name of proprietary concern by any professional body incorporated under a statute. 2. Utility bills such as electricity, water, and landline telephone bills (not older than last two months) in the name of the proprietary concerns. 3. Complete Income Tax Return (Not just the acknowledgment) in the name of the sole proprietor where the firm's income is reflected, duly authenticated/ acknowledged by the Income Tax Authorities as proof of Business/activity in name of proprietary firm.
Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies alongwith latest net-worth certificate copy duly certified by Chartered Accountant or Latest Audited Balance Sheet ,

Additional Documents (Sole Proprietorship):

S/N.	Document Name	Remarks
1.	Cancelled cheque of the Firm	Of the bank account where the loan is to be disbursed
2.	Last 2 FY Income Tax Return (ITR) copies alongwith Computation of Income or Latest Network Certificate issued by a Chartered Accountant or Latest Audited Balance Sheet	
3.	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than 1 year old) where	
	last FY ITR is showing as a loss or where ITR is not available.	
4	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies alongwith latest net-worth certificate copy duly certified by Chartered Accountant or Latest Audited Balance Sheet

Hindu Undivided Family (HUF) -

Category	KYC Document
HUF	<ul style="list-style-type: none"> • Pan card copy of HUF attested by Karta. • Latest Address proof of HUF attested by Karta like Bank Statement (not older than last two months). • Certified copy of the Karta (Individual) containing details of identity and address be obtained (as per 'Individual table' given above).

Additional Documents (HUF):

S/N.	Document Name	Remarks
1.	RTGS Letter/Disbursement request	Format available in LAS booklet
2.	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies alongwith latest net-worth certificate copy duly certified by Chartered Accountant or Latest Audited Balance Sheet ,
3	Copy of cancelled cheque	Of the bank account where the loan is to be disbursed
4	Last 2 FYs ITR copies of HUF alongwith Computation of Income or Latest Networth Certificate issued by a Chartered Accountant or Latest Audited Balance Sheet	
5	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than 1 year old) where last FY ITR is showing as a loss or where ITR is not available	

Companies/ Corporates -

Category	KYC Document
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Companies/ Corporates	<p><u>Certified copy of:</u></p> <ul style="list-style-type: none"> • Certificate of incorporation; • Memorandum and Articles of Association; • A resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf on company letter head as per format circulated separately. • Identification and Address proof of beneficial owners, i.e. natural persons who have control or who own controlling stake (25% or more of the shares or capital). • Aadhaar numbers; and Permanent Account Numbers or Form 60 as defined in the Income-tax Rules, 1962, issued to managers, officers or employees holding an attorney to transact on the company's behalf or where an Aadhaar number has not been assigned, proof of application towards enrolment for Aadhaar and in case Permanent Account Number is not submitted an OVD shall be submitted: <i>Provided that for the purpose of this clause if the managers, officers or employees holding an attorney to transact on the company's behalf are not eligible to be enrolled for Aadhaar number and do not submit the PAN, certified copy of an OVD shall be submitted.</i>
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Additional documents (Companies/ Corporate):

Sr. No.	Document Name	Remarks
1.	RTGS Letter/Disbursement request	Format available in LAS booklet
2.	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies alongwith latest net-worth certificate copy duly certified by Chartered Accountant or Latest Audited Balance Sheet.
3	Pan card copy/Latest Address of Company, Authorised Signatories/Directors	To be signed by respective authority
4	List of Authorized Signatories, List of Directors and Shareholding Pattern (with percentage) as on date	On company letter head.
5	MOA/AOA & Certificate of Incorporation, MCA site print of Company and Signatory list	-

6	Cancelled cheque leaf	Of the bank account where the loan is to be disbursed
7	Last 2 FYs ITR copies alongwith Audit Report	Mandatory
8	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Networth Certificate (not more than one year old) - where ITR is not available or last FY ITR is showing a loss	
9	UBO declaration form	Format available in LAS booklet. Should be complete filled up. KYC documents and ITR for past two years required for UBO.

Partnership Firm -

Category	KYC Document
Partnership Firms	<u>Certified copy of:</u> <ul style="list-style-type: none"> • Registration certificate; • Partnership deed; • List of all partners and their Profit / Loss sharing ratios on the firm's letterhead, signed by authorized signatory ☐ An officially valid document (Authority Letter, on the firm's letterhead, signed by all partners) in respect of the authorized signatories / person(s) holding an attorney to transact or execute documents on behalf of the firm. • Identification (Pan card copy) and Address proof of Firm and Authorised Signatories/Partners and other beneficial owners, i.e. natural persons who have control or who own controlling stake (15% or more of the shares or capital). • Aadhaar number; and PAN or Form 60 as defined in the Income-tax Rules, 1962, issued to the person holding an attorney to transact on its behalf or where an Aadhaar number has not been assigned, proof of application towards enrolment for Aadhaar and in case PAN is not submitted an OVD shall be submitted: <i>Provided that for the purpose of this clause, if the person holding an attorney to transact on the company's behalf is not eligible to be enrolled for Aadhaar number and does not submit the PAN, certified copy of an OVD shall be submitted.</i>

Additional Documents (Partnership Firms):

Sr. No.	Document Name	Remarks
1	RTGS Letter/Disbursement request	Format available in LAS booklet

2	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies alongwith latest net-worth certificate copy duly certified by Chartered Accountant or Latest Audited Balance Sheet.
3	Last 2 FYs ITR copies alongwith Computation of Income or Latest Networth Certificate issued by a Chartered Accountant or Latest Audited Balance Sheet	
4	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than one year old) - where ITR is not available or last FY ITR is showing a loss	
5	Cancelled cheque leaf	Of the bank account where the loan is to be disbursed
6	UBO declaration form	Format available in LAS booklet. Duly filled up. KYC documents and ITR for past two years required for UBO.

Trust /Association of Persons (AOP) -

Category	KYC Document
Trust/ Association of Persons (AOP)	<p><u>Certified copy of:</u></p> <ul style="list-style-type: none"> Registration certificate of the Trust, if it is registered; Trust deed; and Board of Trustees OR Managing Committee resolution duly signed (with stamp) by Managing Trustee OR Chairman Or full time Company Secretary or at least two Trustees (other than those being authorised). List of beneficial owners / beneficiaries, Author of the trust and Trustees on the letter head. <p>The identification of beneficial owner(s) shall include identification of beneficiaries with 15% or more interest in the trust or its income / property and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.</p> <ul style="list-style-type: none"> Identification and address proof of the author of the trust, significant (15% or more) beneficiaries, trustees and authorized PoA holder(s) of the trust. Aadhaar number; and PAN or Form 60 as defined in the Income-tax Rules, 1962 issued to the person holding an

	<p>attorney to transact on its behalf or where Aadhaar number has not been assigned, proof of application towards enrolment for Aadhaar and in case PAN is not submitted an OVD shall be submitted: <i>Provided that for the purpose of this clause if the person holding an attorney to transact on the behalf of the Trust/ AOP is not eligible to be enrolled for Aadhaar number and does not submit the PAN, certified copy of an OVD shall be submitted.</i></p>
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Additional Documents (Trust /Association of Persons (AOP):

Sr. No.	Checklist of documents	Remarks
1	RTGS Letter/Disbursement request	Format available in LAS booklet
2	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies alongwith latest net-worth certificate copy duly certified by Chartered Accountant or Latest Audited Balance Sheet
3	Board / Trustee Resolution authorising borrowing and persons authorised to transact	On Letter head as per format. To be signed (with stamp) by Managing Trustee Or Chairman Or full time Company Secretary or at least two Non Authorised Trustees of the BR.
4	Last 2 FYs ITR copies alongwith Computation of Income or Latest Networth Certificate issued by a Chartered Accountant or Latest Audited Balance Sheet	
5	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than one year old) - where ITR is not available or last FY ITR is showing a loss	
6	Copy of cancelled cheque	Of the bank account where the loan is to be disbursed
7	UBO declaration form	Format available in LAS booklet. Duly filled up. KYC documents and ITR for past two years required for UBO.

Un-incorporated Association or a Body of Individuals -

Category	KYC Document
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<p>Unincorporated Association or Body of Individual (includes societies)</p>	<p><u>Certified copy of:</u></p> <ul style="list-style-type: none"> • Resolution of managing body of such association or body of individuals; • Power of Attorney granted to transact on its behalf. • Such information as the company requires to collectively establish the legal existence of such an association or body of individual. • Identification and Address proof of beneficial owners, i.e. natural persons who have control or who own controlling stake (15% or more of the shares or capital). • Aadhaar number; and PAN or Form 60 as defined in the Income-tax Rules, 1962 issued to the person holding an attorney to transact on its behalf or where Aadhaar number has not been assigned, proof of application towards enrolment for Aadhaar and in case PAN is not submitted an OVD shall be submitted: <i>Provided that for the purpose of this clause if the person holding an attorney to transact on the behalf of an unincorporated association/ body of individuals is not eligible to be enrolled for Aadhaar number and does not submit the PAN, certified copy of an OVD shall be submitted.</i>
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Juridical Persons -

Category	KYC Document
<p>Juridical persons (Government or its Departments, societies, universities and local bodies like village panchayats)</p>	<p><u>Certified copy of:</u></p> <ul style="list-style-type: none"> • Document showing name of person authorised to act on behalf of the entity; • Officially Valid Documents for proof of identity and address in respect of the person holding a power of attorney to transact in its behalf; and • Such documents as may be required by the company to establish the legal existence of such an entity. • Identification and Address proof of beneficial owners, i.e. natural persons who have control or who own controlling stake (15% or more of the shares or capital).

Documentation for addition for 3rd party pledgor/guarantor:

1. 3rd party pledgor agreement.
2. 3rd party pledgor PoA.
3. All KYC documents of the 3rd party pledgor.
4. All KYC documents of the Guarantor as prescribed above

NOTE:

1. For customers who have been categorized as “Low Risk” as per Risk Categorization Policy, below mentioned documents can be collected as Id/address Proof only in case customer is unable to produce above mentioned documents:

- a. Identity card with applicant's Photograph issued by Central/State Government Departments, Statutory/Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, and Public Financial Institutions;
 - b. letter issued by a Gazetted officer, with a duly attested photograph of the person. List of Gazetted officers are defined in **Exhibit 1**, whose letters would be accepted;
 - c. utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, Water bill);
 - d. property or Municipal tax receipt;
 - e. bank account or Post Office savings bank account statement;
 - f. pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings, if they contain the address;
 - g. Letter of allotment of accommodation from employer issued by State or Central Government departments, statutory or regulatory bodies, and public sector undertakings, scheduled commercial banks, financial institutions and listed companies. Similarly, leave and license agreements with such employers allotting official accommodation; and
 - h. documents issued by Government departments of foreign jurisdiction and letter issued by Foreign Embassy or Mission in India.
2. For customers who have been categorized as “Low Risk” and are re categorized as “Medium” or “High” risk category than the Company shall obtain documents as proof of identity and proof of address immediately. In the event the customer fails to submit such documents than the Company shall initiate action of partial freezing/ closure of accounts as envisaged in Section 39 of RBI KYC Circular.
 3. The Company may provide an option for One Time Pin (OTP) based e-KYC process for on-boarding of customers, subject to following conditions:
 - a. Consent from customers for authentication;
 - b. Only term loans shall be sanctioned, aggregating amount not exceeding Rs. 60,000 in a year;
 - c. Accounts opened using OTP based e-KYC shall not be allowed for more than 1 year. CCD procedure to be completed within the said one year, else no further debits be allowed.
 - d. Declaration to be obtained from customers to that effect that no other account has been opened nor will be opened using OTP based KYC either with same NBFC or with any other NBFC.
 4. Documents and details required under section 285BA of the Income Tax Act, for the purpose of compliance with reporting obligations under Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standards (CRS) also may need to be obtained from customers. These are contained in Rules 114F-114H of the Income Tax Rules. This would be required where the customer has a relationship beyond just taking loans with the Company.
 5. In case the client, eligible to be enrolled for Aadhaar and obtain a PAN, does not submit the Aadhaar number or the PAN at the time of commencement of an account based relationship with the Company, the client shall submit the same within a period of 6 months from the date of the commencement of the account based relationship; and in case the client fails to submit the Aadhaar number and PAN within the said 6 months period, the said account shall cease to be operational till the time the Aadhaar number and PAN is submitted by the client.

EXHIBIT – 1: List of Gazetted Officers

1. Commissioned officers of the Indian Armed Forces.
 2. Officers from the All-India Civil Services (IAS, IPS, IFS, etc.).
 3. Engineering Services officers.
 4. State Civil Service officers (executive) in the State Governments (PCS/SCS/PPS/upper subordinate officers).
 5. Senior Physician (C.M.O.) in State/Central Hospital.
 6. Senior Surgeons of Government health service.
 7. Chief Pharmacist and beyond All Officers in Pharmacy Cadres State/Central Hospital.
 8. Chief Engineers of Central Public Works Department.
 9. Magistrates and above in the judicial services.
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