Sattva Holding and Trading Private Limited

KNOW YOUR CUSTOMER (KYC) POLICY
&
PREVENTION OF MONEY LAUNDERING (PML) POLICY

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Policy Custodian:

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1. Background

The Reserve Bank of India ["RBI"] has, under the Reserve Bank of India Act, 1934 ["RBI Act"], issued the Reserve Bank of India (Core Investment Companies) Directions, 2025 ["the CIC Directions"]. The Directions have prescribed applicability of Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025 ["KYC Directions"], which are in line with the requirements of the Prevention of Money Laundering Act, 2002, as amended from time to time ["PMLA"].

The Company, being a Core Investment Company registered U/s 45-IA of the RBI Act as a Middle Layer CIC, is engaged in investment and financing activities to its entities in the Group, and therefore, is required to comply with the KYC Directions to the extent of its applicability to the Company while dealing with the group Companies.

In view of above, this policy document lays down the policy of the Company and the guidelines to be adhered to ensure identification of beneficial ownership and to establish best anti money laundering practices.

2. Objectives

The objectives of this policy are as under:

i. To prevent criminal elements from using Company for money laundering activities.

ii. To enable the Company to know and understand its customers and financial dealings in a better manner, which in turn, shall help manage the risks prudently.

iii. To establish appropriate, effective and efficient controls for detection and reporting of suspicious activities in accordance with the applicable laws / laid down procedures.

iv. To comply with the applicable regulations and operate within the regulatory framework prescribed by the regulator.

v. To ensure importance of KYC / AML / Combating the Financing of Terrorism ["CFT"] is established with the concerned employees / persons dealing on behalf of the Company.

vi. To ensure adequate training to the employees / persons dealing with customers on behalf of the Company in the KYC / AML / CFT procedures.

vii. To update and ensure continuing adherence to the Directions as issued by RBI from time to time after deliberations by the board.

3. Scope

This policy document covers all transactions of the Company, and is applicable organization-wide to all employees / representatives dealing on behalf of the Company.

This policy is to be read in conjunction with the operational guidelines issued by RBI and Financial Intelligence Unit – India ["FIU-Ind"] from time to time. The content of this policy shall always be read in tandem / auto-corrected with the changes / modifications as may be advised by RBI and / or by PMLA and amendments of the Directions, from time to time.

In case of any discrepancy between this policy and any directions issued by RBI, the applicable directions, as amended from time to time, shall supersede this policy.

4. Governance

The Board of Directors of the Company shall be responsible for the purposes of compliance with overview of the systems placed for such compliance with the Know Your Customer ["KYC"] / Anti-Money Laundering ["AML"] / Combating Financing of Terrorism ["CFT"] procedures of the Company.

The Principal Officer ["PO"] of the Company, so appointed, shall be responsible for effective and complete implementation of the procedures prescribed under this policy. The PO shall make his reporting to the Senior Management i.e. the board of directors including "Designated Director".

The Company shall devise the internal audit function/Specialized Internal control systems in a manner, which shall extensively include verification of KYC / AML / CFT procedures undertaken by the Company, and its compliance with this policy and regulatory requirements.

Designated Director: The Company has appointed Promoter Director of the Company, as the Designated Director to ensure overall compliance with the obligations imposed under Chapter IV of the PML Act and the Rules, as nominated by the Board of Directors.

The Designated Director of the Company shall not be the same as the Principal Officer of the Company at any point as guided in the Directions.

The Designated Director, along with other members of "Senior management" shall perform an overview function of the compliance with policies and shall evaluate the Quarterly Audit Notes prepared by the Principal Officer and other authorities to whom internal audit function is assigned.

Principal Officer: The Company shall designate a senior employee as a Principal Officer (PO), who shall be located at Head/Corporate Office and not be the same as the Designated Director, for ensuring compliance, monitoring transactions, and sharing and reporting information as required under the law/regulations. PO shall maintain close liaison with enforcement agencies, NBFCs, Credit Information Companies, FIU-Ind, and any other institutions involved in the fight against money laundering and CFT.

Change in Officers: The Company shall intimate the Regional Office of RBI, along with the office of FIU-Ind, of any change in the Principal Officer and / or Designated Director of the Company and / or their details within one month of the date of such change.

5. PMLA Framework and Training

The Company shall place adequate mechanism at each stage of the lending operation from sanction, disbursement to collection, for ensuring identification of transactions Money Laundering Transactions and flow of laundered money into the system.

A detailed Standard Operating Procedure and checklist of precautions to be taken has been formulated by the Operations Head and approved by the Board of Directors and shall be updated from time to time. The documents shall timely escalation and consistent checks across organization to the concerned personnel.

Appropriate and timely training sessions shall be held for all the employees of the company engaged in the lending operations, irrespective of dealing with the customer or not, to ensure updated knowledge of the subject matter and effective adherence with the internal policies and framework.

The company shall identify and assess the ML/TF risks that may arise in relation to the development of new products and new business practices, including new delivery mechanisms, and the use of new or developing technologies for both new and pre-existing products by undertaking the risk assessments prior to the launch or use of such products, practices, services and technologies; and take appropriate measures to manage and mitigate the risks.

Adequate screening mechanisms, including Know Your Employee / Staff policy, as an integral part of their personnel recruitment/hiring process shall be put in place. The company shall endeavour to ensure that the staff dealing with / being deployed for KYC/AML/CFT matters have: high integrity and ethical standards, good understanding of extant KYC/AML/CFT standards, effective communication skills and ability to keep up with the changing KYC/AML/CFT landscape, nationally and internationally. The company shall also strive to develop an environment which fosters open communication and high integrity amongst the staff.

On-going employee training programme shall be put in place so that the members of staff are adequately trained in KYC/AML/CFT policy. The focus of the training shall be different for frontline staff, compliance staff and staff dealing with new customers. The front desk staff shall be specially trained to handle issues arising from lack of customer education. Proper

staffing of the audit function with persons adequately trained and well-versed in KYC/AML/CFT policies of the RE, regulation and related issues shall be ensured.

6. Material Concepts

AADHAAR Number

Aadhaar number shall have the meaning assigned to it in clause (a) of section 2 ofthe Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 (18 of 2016);

Customer

For the purposes of this policy, "Customer" shall mean a person, engaged in a financial transaction / activity with the Company and includes a person on whose behalf the person who is engaged in the transaction / activity, is acting. "Person" for the purposes of this policy shall include the following category of entities forming part of the group:

i. A Company
ii. A Firm
iii. An Association of Persons / Body of Individuals, whether incorporated or not
iv. Every artificial juridical person, not falling within any one of the above persons
v. Any agency / Office / Branch owned / controlled by any of the persons above

Beneficial Owner

a. Where the customer is a **company**, the beneficial owner is the natural person(s), who, whether acting alone or together, or through one or more juridical persons, has/have a controlling ownership interest or who exercise control through other means.

"Controlling ownership interest" means ownership of entitlement to more than 10 per cent of the shares or capital or profits of the company.

"Control" shall include the right to appoint majority of the directors or to control the management or policy decisions including by virtue of their shareholding or management rights or shareholders agreements or voting agreements.

b. Where the customer is a **partnership firm**, the beneficial owner is the natural person(s), who, whether acting alone or together, or through one or more juridical person, has/have ownership of/entitlement to more than 15 per cent of capital or profits of the partnership.

c. Where the customer is an **unincorporated association or body of individuals**, the beneficial owner is the natural person(s), who, whether acting alone or together, or through one or more juridical person, has/have ownership of/entitlement to more than 15 per cent of the property or capital or profits of the unincorporated association or body of individuals.

Term 'body of individuals' includes societies. Where no natural person is identified under (a), (b) or (c) above, the beneficial owner is the relevant natural person who holds the position of senior managing official.

d. Where the customer is a **trust**, the identification of beneficial owner(s) shall include identification of the author of the trust, the trustee, the beneficiaries with 10% 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.

Officially Valid Document

Officially Valid Document ["OVD"] means the passport, the driving licence, proof of possession of Aadhaar number, the Voter's Identity Card issued by the Election Commission of India, job card issued by NREGA duly signed by an officer of the State Government and letter issued by the National Population Register containingdetails of name and address.

Provided that:

a. 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.

b. where the OVD furnished by the customer does not have updated address, the following documents or the equivalent e-documents thereof shall be deemed to be OVDs for the limited purpose of proof of address:
   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 Government or Central Government 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;

c. the customer shall submit OVD with current address within a period of three months of submitting the documents specified at 'b' above

d. where the OVD presented by a foreign national does not contain the details of address, in such case the documents issued by the Government departments of foreign jurisdictions and letter issued by the Foreign Embassy or Mission in India shall be accepted as proof of address.

Explanation: For the purpose of this clause, 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.

Unique Customer Identification Code

The Company shall assign a Unique Customer Identification Code ["UCIC"] to both existing as well as new customers, in order to link all account-based relationships / transactions to the customer.

Note: Terms used under this policy and not defined hereunder shall have the same meaning as assigned to them under the KYC Directions, PMLA Act 2002 or Rules thereunder, Aadhar Act, 2016 or rules made thereunder and any other applicable provisions.

7. Customer Acceptance Policy

The Company's Customer Acceptance Policy ["CAP"] lays down the basic criteria for acceptance of customers, with the framework constituted of the following. The Company shall ensure that:

a. No account is opened in anonymous or fictitious/benami name.

b. No account is opened where the RE is unable to apply appropriate CDD measures, either due to non-cooperation of the customer or non-reliability of the documents/information furnished by the customer.

c. No transaction or account-based relationship is undertaken without following the Customer Due Diligence ["CDD"] procedure.

d. 'Optional'/additional information, where such information requirement has not been specified in the policy is obtained with the explicit consent of the customer after the account is opened.

e. the CDD procedure is applied at the UCIC level. Thus, if an existing KYC compliant customer desires to open another account, there shall be no need for a fresh CDD exercise.

f. CDD Procedure is followed for all the joint account holders, while opening a joint account.

g. Circumstances in which, a customer is permitted to act on behalf of another person/entity, is clearly spelt out.

h. Optional'/additional information, where such information requirement has not been specified in the policy is obtained with the explicit consent of the customer after the account is opened.

i. Suitable system is put in place to ensure that the identity of the customer does not match with any person or entity, whose name / whose beneficial owners' name

prima facie seems to be belonging to criminal background and / or appears in the sanctions lists circulated by Reserve Bank of India / any other recognized organization.

j. Permanent Account Number ["PAN"] is obtained and is verified from the verification facility of the issuing authority.

k. Where an equivalent e-document is obtained from the customer, it has verified the digital signature as per the provisions of the Information Technology Act, 2000 (21 of 2000).

l. The company shall ensure customer acceptance is in compliance with Section 51A of the Unlawful Activities (Prevention) (UAPA) Act, 1967

m. The Company being a Core Investment Company, is not permitted to open accounts of entities outside of the ambit of its Companies in the Group.

n. Where Goods and Services Tax (GST) details are available, the GST number shall be verified from the search/verification facility of the issuing authority.

Where a suspicion of money laundering or terrorist financing, and Principal Officer/ Officer/ Employee of the company reasonably believes that performing the CDD process will tip-off the customer, they shall escalate the matter and not pursue the CDD process. Appropriate authority shall proceed to file an STR with the FIU India's Fingate Portal.

8. Customer Risk Management

The Company shall follow a risk-based approach which includes the following:

a. Broad principles have been laid down for effective risk-categorisation of customers, which are
   i. The categorization shall be made without prejudice to the Fair Practice Code of the company.
   ii. The categorization matrix shall be practical and updated.
   iii. The parameters for customer categorization shall be evaluated on periodic basis and prevailing industry circumstances
   iv. Risk Categorization shall be made/updated post obtaining all the documents/information from the customer as well as internal research.
   v. Risk Category may be upgraded/downgraded at any time considering the facts available and with appropriate reporting to the Risk Management Committee.
   vi. The risk categorization system shall consider other principles guiding the operations of the company

b. Customers shall be categorised as low, medium and high-risk category, based on the assessment and risk perception.

   High Risk Customers typically include following customers / beneficial owner

   i. Non-Resident Customers
   ii. High net-worth individuals without occupation track record of two or more years

iii. Trust, charitable organizations, Non-Government Organization (NGO), organizations receiving donations
iv. Companies having close family shareholding or beneficial ownership;
v. Firms with sleeping partners
vi. Politically exposed persons (PEPs) of Indian/ foreign origin;
vii. Person with dubious reputation as per public information available

c. Risk categorisation shall be undertaken based on parameters such as customer's identity, social/financial status, nature of business activity, and information about the clients' business and their location etc. While considering customer's identity, the ability to confirm identity documents through online or other services offered by issuing authorities may also be factored in.

The risk categorisation and the specific reasons for such categorisation shall be kept confidential and shall not be revealed to the customer to avoid tipping off the customer.

Explanation: FATF Public Statement, the reports and guidance notes on KYC/AML issued by the Indian Banks Association ["IBA"], guidance note circulated to all cooperative banks by the RBI etc., may also be used in risk assessment.

All dealings with the High Risk Customers are to be approved by the Board of Directors vide a Board Resolution.

Note: The company shall not engage in any cross border wire transfer transactions to its customers outside India as the company's lending scope is currently limited only to Resident Indians.

9. Customer Identification Procedure ["CIP"]

The Company shall undertake CIP in the following cases:

a. Commencement of an account-based relationship with the customer.
b. When there is a doubt about the authenticity or adequacy of the customer identification data it has obtained.
c. When it has reason to believe that a customer is intentionally structuring a transaction into a series of transactions below the threshold of rupees fifty thousand.

Given the limited size of operations of the Company and its dealings restricted within the Group Companies, the Company shall not be offering any form of Video based Customer Identification Procedure or Digital KYC based procedures.

10. Outsourcing

For the purpose of verifying the identity of customers at the time of commencement of an account-based relationship, the Company may rely on Customer Due Diligence (CDD) done by a third party, subject to the following conditions, in addition to the Company's Outsourcing Policy:

a. Records or the information of the CDD carried out by the third party is obtained within two days from the third party or from the Central KYC Records Registry.

b. Adequate steps are taken to satisfy that copies of identification data and other relevant documentation relating to the CDD requirements are available from the third party upon request without delay.

c. The third party is regulated, supervised or monitored for, and has measures in place for, compliance with customer due diligence and record-keeping requirements in line with the requirements and obligations under the PMLA.

d. The third party is not be based in a country or jurisdiction assessed as high risk.

e. *The Regulated Entity (RE) that has last uploaded or updated a customer's KYC record in the Central KYC Records Registry (CKYCR) shall bear the responsibility for verification of the customer's identity and/or address, as applicable and shall not be required to undertake re-verification of the customer's identity and/or address, provided such records are current and compliant with the applicable provisions of the PML Act and Rules.*

f. *Notwithstanding such reliance, the NBFC shall continue to remain fully responsible for compliance with all other Customer Due Diligence (CDD) requirements under the extant KYC Directions.*

11. Customer Due Diligence ["CDD"]

The Company, being a Middle Layer NBFC (CIC), is not permitted to lend to entities not falling within the Companies in the Group. Accordingly, the Company cannot open accounts of individuals. Given the limited operations of the Company, and the

strategic nature of each transaction, the Company does not conduct e-KYC / Digital KYC / V-CIP / Simplified Due Diligence procedures. Further, the Company also does not open small accounts.

However, CDD procedures are to be followed for individuals, that are Beneficial Owners, Authorized Signatories or Power of Attorney holders of any account of a legal entity.

For Individuals:
Certified Copies of following documents are to be obtained (post verification with originals):

a. PAN Card issued by the Income Tax Department
b. Masked AADHAAR Card (If it is not masked, Company shall ensure the AADHAAR number is redacted / blacked out)
c. Additional one OVD

In person verification may also be conducted by the relevant officer and adequately documented.

Note: the KYC Identifier with an explicit consent to download records from CKYCR may also be obtained if the individual is already registered on CKYCR.

For Legal Entities:
Certified Copies of following documents are to be obtained (post verification with originals):

a. Certificate of incorporation / Registration Certificate
b. Memorandum and Articles of Association
c. PAN Card of the company
d. A resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf
e. Last two years' audited financial statements along with audit reports
f. Shareholding Pattern along with movements of last two years
g. Beneficial Owners' List
h. The names of the relevant persons holding senior management position; and
i. The registered office and principal place of its business, if different.

Note: The KYC identifier facility for the customers whether individual or legal entities shall be utilized for the purpose of CDD provided compliance with the following:

Where a customer, submits a KYC Identifier, with an explicit consent to download records from CKYCR, the company shall retrieve the KYC records online from the CKYCR using the KYC Identifier and the customer shall not be required to submit the same KYC records or information or any other additional identification documents or details, unless –

(i) there is a change in the information of the customer as existing in the records of CKYCR;
(ii) the current address of the customer is required to be verified;
(iii) the RE considers it necessary in order to verify the identity or address of the customer, or to perform enhanced due diligence or to build an appropriate risk profile of the client.

12. On-Going Due Diligence

The Company shall undertake on-going due diligence of customers to ensure that their transactions are consistent with their knowledge about the customers, customers' business and risk profile; and the source of funds.

Without prejudice to the generality of factors that call for close monitoring following types of transactions shall necessarily be monitored:

a. Large and complex transactions including RTGS transactions, and those with unusual patterns, inconsistent with the normal and expected activity of the customer, which have no apparent economic rationale or legitimate purpose.
b. Transactions which exceed the thresholds prescribed for specific categories of accounts.
c. High account turnover inconsistent with the size of the balance maintained.
d. Deposit of third-party cheques, drafts, etc. in the existing and newly opened accounts.
e. Compliance with Section 51A of the Unlawful Activities (Prevention) (UAPA)Act, 1967

The extent of monitoring shall be aligned with the risk category of the customer. High risk accounts have to be subjected to more intensified monitoring. A system of periodic review of risk categorisation of accounts, with such periodicity being at least once in six months, and the need for applying enhanced due diligence measures shall be put in place.

13. Periodic Updation

The company shall adopt a risk-based approach for periodic updation of KYC of customers, if any. Periodic updation shall be carried out at least once in every two years for high risk customers, once in every eight years for medium risk customers and once in every ten years for low risk customers.

Periodic updation refers to conducting CDD procedures afresh with latest documents. An acknowledgement of conducting CDD procedures is to be issued to the Customer.

Further, the following points shall be considered for performing periodic updation:

1. Individuals:

   a. No change in KYC information: In case of no change in the KYC information, a self-declaration from the customer in this regard shall be obtained from customer.
   b. Change in address: In case of a change only in the address details of the customer, a self-declaration of the new address shall be obtained from the customer

2. Customers other than individuals:

   a. No change in KYC information: In case of no change in the KYC information of the legal entity customer, a self-declaration in this regard shall be obtained from the legal entity. Further, ensure during this process that Beneficial Ownership (BO) information available with them is accurate and shall update the same, if required, to keep it as up-to-date as possible.
   b. Change in KYC information: In case of change in KYC information, the company shall undertake the KYC process equivalent to that applicable for on-boarding a new legal entity customer.

3. Additional measures: In addition to the above, the company shall ensure that,

   a. The KYC documents of the customer as per the current CDD standards are available with them. This is applicable even if there is no change in customer information but the documents available with the company are not as per the current CDD standards.
   b. Customer's PAN details, is verified from the database of the issuing authority at the time of periodic updation of KYC.
   c. Acknowledgment is provided to the customer mentioning the date of receipt of the relevant document(s), including self-declaration from the customer, for carrying out periodic updation. Further, it shall be ensured that the information / documents obtained from the customers at the time of periodic updation of KYC are promptly updated in the records / database mentioning the date of updation of KYC details, is provided to the customer.

d. In order to ensure customer convenience, the company may consider making available the facility of periodic updation of KYC at any branch.
e. The company shall adopt a risk-based approach with respect to periodic updation of KYC.

4. The Company shall advise the customers that in order to comply with the PML Rules, in case of any update in the documents submitted by the customer at the time of establishment of business relationship / account-based relationship and thereafter, as necessary; customers shall submit to the company the update of such documents.

   This shall be done within 30 days of the update to the documents for the purpose of updating the records at REs' end.

Note; The company utilizes offline means to update the customer records and hence no form of update through OTP based e-KYC or any other mechanism for updation shall be done by the company.

14. Enhanced Due Diligence

Non-Face-to-Face Customers

The Company, being registered as a CIC, is permitted to extend loan facilities only to its group companies in accordance with the applicable regulatory framework. Accordingly, the Company does not have any non–face-to-face customers or retail customers requiring enhanced customer due diligence measures.

The customer due diligence procedures of the Company are therefore limited to its group entities, and enhanced due diligence requirements applicable to non–face-to-face or high-risk customers shall not be applicable and hence the relevant procedures are not incorporated in the policy

Politically Exposed Persons ["PEP"] as Customers / Beneficial Owner

Politically Exposed Persons are individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior government/judicial/military officers, senior executives of state-owned corporations, important political party officials, etc.
As a general practice, the Company shall not undertake transactions with customers that are PEP.

On change in Non-PEP to PEP status of the customer, the Company shall gather sufficient information on Person/Customer of this category and check all the information available on the Person in the public domain. The Company shall verify the identity of the Person and seek information about the sources of funds. The decision to provide financial services to an account for PEP / account where PEP is a beneficial owner shall be taken at the Board of Directors level and shall be subjected to monitoring on an ongoing basis. The above shall also be applied to the accounts of the family members or close relatives of PEPs.

Trust/Nominee or Fiduciary Accounts

The Company shall determine whether the Customer is acting on behalf of another person as trustee/nominee or any other intermediary. If so, they shall insist on receipt of satisfactory evidence of the identity of the intermediaries and of the Persons on whose behalf they are reacting, as also obtain details of the nature of the trust or other arrangements in place. 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, branches shall take steps to verify the founder managers/ directors and the beneficiaries, if defined. There exists the possibility that trust/nominee or fiduciary accounts can be used to circumvent the Customer Identification Procedures.

Accounts of Legal Entities

The Company shall be vigilant of business entities being used by individuals as a front for maintaining accounts with the Company. The Company mandatorily has to examine the 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 may be moderated according to the risk perception e.g. in the case of a public company it shall not be necessary to identify all the shareholders.

Note: The company shall not have any non-face to face customer hence enhanced due diligence for the same has not been addressed above

15. Monitoring of Transactions

Ongoing monitoring:

Ongoing monitoring is an essential element of effective KYC/AML procedures. The Company being CIC it should have dealings only with group companies and the Company shall exercise ongoing due diligence with respect to every customer and closely examine the transactions to ensure that they are consistent with the customer's profile and source of funds as per extant instructions.

16. Money Laundering and Terrorism Financing Risk Assessment

Given the Company's limited operations, the Company conducts a Money Laundering and Terrorism Financing Risk Assessment annually to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk.

As a policy, the Company (i) does not undertake any transactions in Cash, (ii) does not undertake any investment / lending activities without the explicit prior approval of the Board of Directors, and (iii) given that the Company is a CIC, the exposure is restricted to Companies in the Group. This virtually eliminates Money Laundering and Terrorism Financing Risk.

17. Record Management

The following steps shall be taken regarding maintenance, preservation andreporting of customer account information, with reference to provisions of PMLA.

The Company shall,

a. maintain all necessary records of transactions between the Company and the customer, both domestic and international, for at least five years from the date of transaction;

b. 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 five years after the business relationship is ended;

c. make available the identification records and transaction data to the competent authorities upon request;

d. introduce a system of maintaining proper record of transactions prescribed under PML Rules;

e. maintain all necessary information in respect of transactions prescribed under PML Rules so as to permit reconstruction of individual transaction, including the following:
   (i) the nature of the transactions;
   (ii) the amount of the transaction and the currency in which it was denominated;
   (iii) the date on which the transaction was conducted; and
   (iv) the parties to the transaction.

f. evolve 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;

g. maintain records of the identity and address of their customer, and records in respect of transactions referred to in Rule 3 in hard or soft format.

h. Comply with the necessary reporting requirements under the PMLA and rules framed thereunder

18. Confidentiality of Information

The Company shall maintain secrecy regarding the customer information which arises out of the contractual relationship between the banker and customer.

Information collected from customers for the purpose of opening of account shall be treated as confidential and details thereof shall not be divulged for the purpose of cross selling, or for any other purpose without the express permission of the customer.

The Company may divulge information to government departments / statutorily required entities:

i. Where disclosure is under compulsion of law
ii. Where there is a duty to the public to disclose,
iii. the interest of the Company requires disclosure and
iv. Where the disclosure is made with the express or implied consent of the customer.

Further, the Company shall ensure compliance with Section 45NB of the RBI Act.

19. Reporting Requirements

Reporting on FINGate 2.0 Portal

The company shall furnish to the director, the Financial Intelligence Unit – India(FIU- Ind) information referred to in Rule 3 of PML (Maintenance of Records) Rules, 2005 in terms of Rule 7 thereof.

The company shall take note of reporting formats and comprehensive reporting formatting guide prescribed/released by FIU-IND and Report Generation Utility and Report Validation Utility developed to assist reportingntities in preparation of prescribed reports.. The Company shall register on the FINGate 2.0 portal, alongwith undertaking registration of the Principal Officer and Designated Director. The reports shall be filed by the Company online only.

Reporting to Financial Intelligence Unit – India (FIU-Ind)

PO shall report information relating to cash and suspicious transactions, if detected, to the Director, Financial Intelligence Unit India (FIU-Ind) as advised in terms of the PML Rules, in the prescribed formats as designed and circulated by RBI at the following address along with necessary online filings:

The Director,
Financial Intelligence Unit – India,
6th Floor, Tower-2,
Jeevan Bharati Building,
Connaught Place,
New Delhi - 110001, India

The Company shall maintain strict confidentiality of the fact of furnishing / reporting details of suspicious transactions.

Central Know Your Customer Registry ["CKYCR"]

The Company shall register itself on the Central Know Your Customer Registry maintained by Central Registry of Securitisation and Asset Reconstruction and Security Interest of India ["CERSAI"] for the purposes of sharing KYC data. The Company shall ensure that the KYC data is regularly shared / verified from the CKYCR for both individuals as well as legal entities.

The company shall communicate the KYC Identifier to the relevant customer for whom the data has been uploaded on the portal.

CERSAI

The Company shall register itself on CERSAI, and shall share all relevant information required, relating to the equitable mortgages created in the favor of the Company.

Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standards (CRS)

The company shall adhere to the provisions of Income Tax Rules to determine the applicability of being a Reporting Financial Institution for FATCA and comply with the reporting requirements.

Additionally the company shall also ensure compliance with reporting to International Agencies as laid down in Chapter Chapter XI of the Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025

20. Customer Education

Company shall educate Customers on the objectives of the KYC policy so that Customer understands and appreciates the motive and purpose of collecting such information. The

Company shall prepare specific literature / pamphlets, terms and conditions etc. so as to educate the Customer about the objectives of this policy.

21. Effective Date

This policy version 8.0 has been adopted at the Company's Board of Directors meeting held on 25th February, 2026 and shall stand applicable organization wide with effect from 25th February, 2026.

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