

Know Your Customer and Anti-Money Laundering Policy

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1. Background

The Reserve Bank of India (RBI) has issued a number of circulars and guidelines to ensure that proper Know Your Customer (KYC) norms are followed by NBFCs and that adequate checks and measures are in place to prevent money laundering. This Know Your Customer and Anti-Money Laundering Policy (Policy) has been framed by **Hi Klass Trading and Investment Limited** (the “Company”) in line with the Master Direction - Know Your Customer (KYC) Direction, 2025 issued by the RBI, as amended from time to time (“KYC Master Directions”).

2. Preamble

Through the following 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 – India (FIU-Ind), or any other agency designated by the Reserve Bank of India, Securities and Exchange Board of India or any other regulatory body, the details of transactions of all or selected clients if and when requested or at regular frequency 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.

3. Objective

Money laundering is the process by which persons with criminal intent or persons involved in criminal activity attempt to hide and disguise the true origin and ownership of the proceeds of their criminal activities, by routing the amounts through legitimate channels such as banks and financial institutions, thereby avoiding prosecution, conviction for such criminal activities.

The objective of KYC guidelines 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 them manage the Company’s risks prudently. The KYC policy shall include following four key elements:

- Customer Acceptance Policy
- Risk Management
- Customer Identification Procedures and
- Monitoring of Transactions

4. Definitions

For the purpose of this Policy:

“Customers or Clients” means a Person who/which avails any loan funds from Hi Klass Trading and Investment Limited (“the Company”) and includes any corporate and other entities whom Hi Klass Trading and Investment Limited (“the Company”) assists in raising financing through capital market transactions and includes any person who acts on behalf of the Customers or Clients (‘Beneficial Owner’).

“Eligibility Criteria” means eligibility criteria of Hi Klass Trading and Investment Limited (“the Company”) as approved by the Board from time to time.

“Person” means has the same meaning assigned in the Prevention of Money Laundering Act, 2002 and includes:

- a. an individual;
- b. a Hindu Undivided Family;
- c. a company;
- d. a firm;
- e. an association of persons or a body of individuals, whether incorporated or not;
- f. every artificial juridical person, not falling within any one of the above persons (a to e); and
- g. any agency, office or branch owned or controlled by any of the above persons (a to f).

“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:

- a. gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
- b. appears to be made in circumstances of unusual or unjustified complexity; or
- c. appears to have no economic rationale or bonafide purpose.

5. Customer Acceptance Policy (CAP)

Hi Klass Trading and Investment Limited (“the Company”) has framed a customer acceptance policy. Without prejudice to the generality of the aspect the Customer Acceptance Policy may contain, the company ensures 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 customer due diligence (CDD) measures.
- c. No transaction or account-based relationship is undertaken without following the (CDD) procedure.
- d. The mandatory information to be sought for KYC purpose while opening an account and during periodic updation, is specified.
- e. Additional information is obtained with the consent of the customer after the account is opened.
- 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. Where PAN is obtained, the same shall be verified from the verification facility of the issuing authority.
- i. Where an equivalent e-document is obtained from the customer, RE shall verify the digital signature as per the relevant provisions.
- j. 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 RE forms a suspicion on money laundering or terrorist financing, and it reasonably believes that performing the CDD process will tip-off the customer, it shall not pursue the CDD process, and instead file an STR with FIU-IND.

8.Customer Identification Procedure (CIP)

For customers that are corporates or other entities, the Company shall:

- a. Verify the legal status of the corporate / other entity through proper and relevant documents as per Annexure 2.

- b. Verify that any person purporting to act on behalf of the corporate / other entity is so authorized and identify and verify the identity of that person.
- c. Obtain sufficient information in order to identify persons which beneficially own or have substantial control over such corporate / other entity. The Company shall also obtain all the KYC documents of the beneficial owner as per Annexure 2.
- d. the Company may verify the Customer's identity including the beneficial owner's identity, using reliable, independent source documents, data and information, if such information is available.
- e. the Company shall also document and implement procedures to resolve information discrepancies and to decline or cease to do business with a Customer when it cannot form a reasonable belief that it knows the true identity of such Customer or cannot adequately complete necessary due diligence. These procedures should include identification of responsible decision makers and escalation paths and detailed standards relating to what actions will be taken if a customer's identity cannot be adequately verified.

9. Existing Customer

The requirements of the earlier sections are not applicable to transactions conducted prior to, on or after the effective date of this Policy by existing Customers, provided that the Company has previously verified the identity of the Customer and the Company continues to have a reasonable belief that it knows the true identity of the Customer. Further, the existing transactions should be continuously monitored and any unusual pattern in the operation of the account should trigger a review of the due diligence measures.

10. Identification of Beneficial Owner

For opening an account of a Legal Person who is not a natural person, the beneficial owner(s) shall be identified and all reasonable steps in terms of Rule 9(3) of the Rules to verify their identity shall be undertaken keeping in view the following:

- a. Where the customer or the owner of the controlling interest is a company listed on a stock exchange, or is a subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.
- b. In cases of trust/nominee or fiduciary accounts whether the customer is acting on behalf of another person as trustee/nominee or any other intermediary is determined. In such cases, satisfactory evidence of the identity of the intermediaries and of the persons on whose behalf

they are acting, as also details of the nature of the trust or other arrangements in place shall be obtained.

11. Reporting

The Company does not accept deposits and the internal policies of the Company do not permit any cash transactions. Nevertheless, if there were to be any such transactions in future, the business processes shall have a system of internal reporting of suspicious transactions and cash transactions, whether such transactions comprise of a single transaction or a series of transactions integrally connected to each other, and where such series of transactions take place within a month.

Further, the Principal Officer shall furnish information of the above-mentioned transactions to FIU-IND by way of electronic filing of reports. Provided that where the Principal Officer, has reason to believe that a single transaction or series of transactions integrally connected to each other have been valued Rs.10 lakh so as to defeat the provisions of the PMLA regulations, such officer shall furnish information in respect of such transactions to FIU-IND Director within the prescribed time.

12. Record Retention

The Company shall document and implement appropriate procedures to retain records of KYC due diligence and anti-money laundering measures. The Company shall implement, at a minimum, the following procedures for retaining records.

“Transaction” shall have the same meaning assigned under Rule 2(h) of the Prevention of Money Laundering (Maintenance of Records) Rules, 2013 i.e., "Transaction" means a purchase, sale, loan, pledge, gift, transfer, delivery or the arrangement thereof and includes:

- a. opening of an account;
- b. deposits, withdrawal, exchange or transfer of funds in whatever currency, whether in cash or by cheque, payment order or other instruments or by electronic or other non-physical means;
- c. the use of a safety deposit box or any other form of safe deposit;
- d. entering into any fiduciary relationship;
- e. any payment made or received in whole or in part of any contractual or other legal obligation;
- f. any payment made in respect of playing games of chance for cash or kind including such activities associated with casino; and
- g. establishing or creating a legal person or legal arrangement.'

Transactions for which records need to be maintained:

- a. All series of cash transactions integrally connected to each other which have taken place within a month.
- b. 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.
- c. All suspicious transactions whether or not made in cash.

Information to be preserved

The information required to be preserved with respect to the above transactions are the nature of transactions, amount and the currency in which it was denominated, date of transaction and the parties to the transaction. A copy of this information should be signed by the person heading the transaction and this should be maintained in a separate file along with all the other transaction related documents.

Periodicity of retention

The following records shall be retained for a minimum period of 5 (five) years from the date of the relevant transaction:

- a. The Customer identification information and residence identification information including the documentary evidence thereof.
- b. All other necessary records pertaining to the transactions that could be produced as evidence for prosecution of persons involved in criminal activity.
- c. Further, a description of the methods used to verify Customer identity as well as a description of the resolution of any discrepancies in verification shall be maintained for a period of at least 5 (five) years after such record was created.

It may be noted that the records of identity of customers and records of transactions may be maintained in hard or soft format. The above records shall be made available to the competent authorities upon request.

13. 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 customer's and its business and risk profile and source of funds.

The following types of transactions shall be closely 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 followed by cash withdrawals for large amounts.

14. Enhanced Due Diligence

The Company does not deal with such category of Customers who could pose a potential high risk of money laundering, terrorist financing or political corruption and are determined to warrant enhanced scrutiny. The Company shall apply a Risk Based Approach (RBA) for mitigation and management of the identified risks. The Company shall commensurate to its nature, size, geographical presence, complexity of activities/structure, etc. carry out 'Money Laundering (ML) and Terrorist Financing (TF) Risk Assessment' exercise annually to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk for clients, countries or geographic areas, products, services, transactions or delivery channels, etc. and report the outcome of such exercise to the audit committee of its board of directors.

The existing credit policies of the Company in respect of its customers ensure that the Company is not transacting with such high-risk Customers. The Company shall conduct enhanced due diligence in connection with all Customers that are determined to pose a potential high risk and are determined to warrant enhanced scrutiny.

The Company, who may engage appropriate outside investigative services or consult appropriate vendor sold databases when necessary. The Company shall establish procedures to decline to do business with or discontinue relationships with any Customer when it cannot adequately complete necessary enhanced due diligence or when the information received is deemed to have a significant adverse impact on reputational risk.

15. Risk Management

For Risk Management, the company have risk-based approach which includes the following:

- a. Customers shall be categorised as low, medium and high-risk category, based on its assessment and risk perception.
- b. Risk categorisation shall be undertaken based on parameters such as customer's identity, social/financial status, nature of business activity, and information about the customer's business

and their location, geographical risk covering customers as well as transactions, type of products/services offered, delivery channel used for delivery of products/services, types of transaction undertaken – cash, cheque/monetary instruments, wire transfers, forex transactions, etc.

- c. The risk categorisation of a customer 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.

Provided that various other information collected from different categories of customers relating to the perceived risk, is non-intrusive and the same is specified in this policy.

16. Monitoring of Transactions

Ongoing monitoring is an essential element of effective KYC procedures.

The Company can effectively control and reduce the risk only if it has an understanding of the normal and reasonable activity of the Customer so that they have 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 Customer.

The Company shall pay special attention to all complex, unusually large transactions and all unusual patterns which have no apparent economic or visible lawful purpose. High-risk Customers have to be subjected to intense monitoring.

The Company shall periodically review and determine the need for applying enhanced due diligence measures based on the risk categorization of Customers. The Company in its loan agreements with Customers, specifies the end-usage of the funding provided. The Company also tracks the end usage of funds by its customers which are financial institutions through monitoring of the assets created by the Customer from the proceeds of the said funding.

On acceptance and identification, the Company would adopt a risk-based customer categorization based on assessment of the customers. Risk categorization shall be undertaken based on parameters such as customer's identity, social/financial status, nature of business activity, 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 shall be factored in.

The categorization criteria are indicative and a final view would be taken by the Company on a case-to-case basis. It would be ensured that customer acceptance, identification and risk categorization procedures do not result in inordinate delay or unreasonable denial of services to customers, especially to those who are financially or socially disadvantaged.

a. High Risk - (Category A): High risk customers typically includes:

- Non - resident Customers
- High net worth individuals without an occupation track record of more than 3 years
- Trust, charitable organizations, non govt. organization (NGO), organizations receiving donations
- Firms with sleeping partners
- Entities with unnecessarily complex ownership structure
- Politically exposed persons (PEPs) of Indian/ foreign origin
- Non-face-to-face customers, where the Company does not rely on the customer due diligence carried out by an intermediary or a third party as permitted under the KYC Master Directions
- Person/Entity with dubious reputation as per public information available
- Person/Entity in business/industry or trading activity where scope or history of unlawful trading/business activity is considered high

b. Medium Risk - (Category B): Medium risk customers shall include:

- Self-employed professionals (other than HNIs),
- High net worth individuals with occupation track record of more than 3 years
- Companies having close family shareholding or beneficial ownership, other than companies regulated by any financial sector regulator
- Non-face-to-face customers, where the Company relies on the customer due diligence carried out by an intermediary or a third party as permitted under the KYC Master Directions

c. Low Risk - (Category C):

Low risk individuals (other than high net worth) and entities whose identities and sources of wealth can be easily identified and all other persons / entities not covered under above two categories. Customer carrying low risk may include the following:

- Salaried employees with well-defined salary structures
- Self-employed customers with business track record for a reasonable period (at least 3 years)
- Government owned companies, public limited companies, private limited companies (other than closely family held), reputed multinational companies, regulators and statutory bodies
- Companies regulated by any financial sector regulator
- People belonging to lower economic strata of the society whose accounts show small balances and low turnover
- Customers not otherwise classified as High Risk or Moderate Risk

Complete KYC exercise will be done at a periodicity not less than once in 6 years in case of low-risk category customers, not less than once in 4 years in case of medium risk category customers and not less than once in 2 years in case of high-risk category customers.

17. Adherence

The Company's operations function shall ensure adherence to the KYC policies and procedures. The Company's internal audit and compliance functions have an important role in auditing adherence to the KYC policies and procedures. The compliance in this regard shall be put up before the Audit Committee of the Board on quarterly intervals.

The Company shall have an ongoing employee training programme so that the employees conducting the KYC are adequately trained in KYC procedures. It is crucial that all concerned employees fully understand the rationale behind the KYC policies and implement them consistently.

The senior management for the purpose of KYC Compliance shall include Chief Executive Officer, Chief Financial Officer, Chief Risk Officer, Head - Finance & Operations and Chief Legal Counsel.

18. Customer Education

If required, the Company may prepare specific literature / pamphlets etc. to educate the Customer of the objectives of the KYC programme.

19. Applicability to branches and subsidiaries outside India

Presently, the Company does not have any branches and subsidiaries outside India. However, if the Company establishes such a branch or a majority owned subsidiary, which is located abroad, especially, in countries which do not or insufficiently apply the FATF Recommendations, the Company shall ensure that the above guidelines are also implemented in these locations, to the extent local laws permit. When local applicable laws and regulations prohibit implementation of these guidelines, the same shall be brought to the notice of Reserve Bank of India.

20. Principal Officer and Designated Director

Hi Klass Trading and Investment Limited shall appoint a Principal Officer for the purpose of compliance with the rules and regulations of this policy.

The Principal Officer shall be responsible for monitoring and reporting of all transactions and sharing of information as required under the law/regulations. The name, designation and address of the Principal Officer shall be communicated to the FIU-IND.

Any of the Director shall be nominated as Designated Director to ensure compliance with the obligations under the Prevention of Money Laundering (Amendment) Act, 2012.

21. Secrecy obligations and sharing of information

- Secrecy obligations
 - a. The company shall maintain secrecy regarding the customer information which arises out of the contractual relationship between the Company and its Customer.
 - b. While considering the requests for data/information from Government and other agencies, the Company shall satisfy itself that the information being sought is not of such a nature as will violate the provisions of the laws relating to secrecy in the banking transactions.
 - c. The exceptions to the said rule shall be as under:
 - i. Where disclosure is under compulsion of law,
 - ii. Where there is a duty to the public to disclose,
 - iii. The interest of Company requires disclosure and
 - iv. Where the disclosure is made with the express or implied consent of the customer.
 - d. The Company shall maintain confidentiality of information as provided in Section 45NB of RBI Act 1934.
- Sharing of information with Central KYC Registry (CKYCR)

The Company shall capture the KYC information for sharing with the CKYCR in the manner mentioned in the Rules, as required by the revised KYC templates prepared for 'individuals' and 'Legal Entities' as the case may be with the Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI) as notified by the Government of India.

22. Policy Review

A review of compliance under this policy would be undertaken by the Management regularly and a consolidated report of such reviews will be submitted to the Board of Directors every year or whenever there is a significant change in law governing the subject matter of the Policy.

23. Independent Assessment

An annual independent assessment of the functioning of this policy is undertaken by the internal auditors of the Company as part of their annual review process. Observations and comment on adherence to this policy and the RBI Guidelines and other applicable statutory requirements are placed before the Audit Committee.

24. REPORTING TO FINANCIAL INTELLIGENCE UNIT - INDIA (FIU-IND):

- i. Company shall prepare the reporting formats and comprehensive reporting format guide, prescribed/ released by FIU-IND and Report Generation Utility and Report Validation Utility developed by FIU. Company shall use the editable electronic utilities to file electronic Cash Transaction Reports (CTR)/ Suspicious Transaction Reports (STR) for extracting CTR/STR from their live transaction data.
- ii. Furnishing of STR to FIU-IND will be strictly kept confidential and that there is no tipping off to the customer at any level.
- iii. Robust software, throwing alerts when the transactions are inconsistent with risk categorization and updated profile of the customers will be put in to use as a part of effective identification and reporting of suspicious transactions.

Annexure 1

Customer Identification Requirements

A) Transactions with trust / nominee or fiduciaries

1. There exists the possibility that trust / nominee or fiduciary accounts can be used to circumvent the Customer Identification Procedure.
2. The Company shall determine whether the Customer is acting on behalf of another person as trustee/nominee or any other intermediary. If so, the Company may 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.
3. While conducting a transaction with a trust, the Company shall take reasonable precautions to verify the identity of the trustees and the settlors of trust (including any person settling assets into the trust), grantors, protectors, beneficiaries and signatories. Beneficiaries should 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.

B) Transactions with companies and firms

1. The Company shall be vigilant against business entities being used by individuals as a 'front' for conducting transactions with the Company.
2. The Company shall 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 will not be necessary to identify all the shareholders.

C) Transactions with Politically Exposed Persons (PEPs) resident outside India

1. PEPs 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.
2. The Company shall gather sufficient information 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.
3. The Company shall verify the identity of the person and seek information about the sources of funds before accepting the PEP as a Customer.

4. The Company shall also subject such transactions enhanced monitoring on an ongoing basis. The above norms may also be applied to transactions with the family members or close relatives of PEPs.
5. The decision to accept a PEP as a Customer shall be taken by the Credit Committee, or the relevant credit decision-making authority.

2List of acceptable KYC documents

Constitution	Documentary Requirements
Company	<ul style="list-style-type: none"> i. Certificate of incorporation ii. Memorandum of Association or the equivalent e-document thereof iii. Articles of Association or the equivalent e-document thereof iv. PAN card of applicant or the equivalent e-document thereof v. Proof of address of applicant vi. Equity share capital table vii. Share capital table on an as if converted/ fully diluted basis viii. Details of existing credit facilities and charges ix. Audited financial statements of the applicant for the last three years x. Resolution passed by the Board of Directors of the applicant and power of attorney granted by the applicant to its managers, officers, employees or such other persons, as the case may be, to transact on its behalf ("Authorized Persons") xi. PAN card of Authorized Persons or the equivalent e-document thereof xii. Certified copy of officially valid documents as proof of identity and address of Authorized Persons or the equivalent e-document thereof xiii. Recent photograph of Authorized Persons holding an attorney to transact on behalf of the applicant xiv. PAN card of beneficial owners of the applicant or the equivalent e-document thereof xv. Recent photograph of beneficial owners of applicant xvi. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of beneficial owners of applicant
Partnership Firms and Limited Liability Partnership	<ul style="list-style-type: none"> i. Registration certificate ii. Partnership deed iii. PAN card of applicant or the equivalent e-document thereof iv. Proof of address of applicant v. Details of existing credit facilities and charges.

	<ul style="list-style-type: none"> vi. Books of accounts of the applicant for the last three years vii. Resolution passed by the managing body of the applicant and power of attorney granted by the applicant to its managers, officers, employees or such other persons, as the case may be, to transact on its behalf ("Authorized Persons") viii. PAN card of Authorized Persons or the equivalent e-document thereof
	<ul style="list-style-type: none"> ix. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of Authorized Persons x. Recent photograph of Authorized Persons holding an attorney to transact on behalf of the applicant xi. PAN card of beneficial owners of the applicant or the equivalent edocument thereof xii. Recent photograph of beneficial owners of applicant xiii. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of beneficial owners of the applicant
Trust	<ul style="list-style-type: none"> i. Registration certificate ii. Trust deed iii. PAN card of applicant or the equivalent e-document thereof iv. Proof of address of applicant v. Details of existing credit facilities and charges. vi. Books of accounts of the applicant for the last three years vii. Resolution passed by the managing body of the applicant and power of attorney granted by the applicant to its managers, officers, employees or such other persons, as the case may be, to transact on its behalf ("Authorized Persons") viii. PAN card of Authorized Persons or the equivalent e-document thereof ix. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of Authorized Persons x. Recent photograph of Authorized Persons holding an attorney to transact on behalf of the Applicant

	<ul style="list-style-type: none"> xi. PAN card of beneficial owners of the applicant or the equivalent e-document thereof xii. Recent photograph of beneficial owners of applicant xiii. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of beneficial owners of the applicant
Society	<ul style="list-style-type: none"> i. Registration certificate ii. Memorandum of Association and bye-laws iii. PAN card of applicant or the equivalent e-document thereof iv. Proof of address of applicant v. Details of existing credit facilities and charges. vi. Books of accounts of the applicant for the last three years
	<ul style="list-style-type: none"> vii. Resolution passed by the managing body of the Applicant and power of attorney granted by the applicant to its managers, officers, employees or such other persons, as the case may be, to transact on its behalf ("Authorized Persons") viii. PAN card of Authorized Persons or the equivalent e-document thereof ix. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of Authorized Persons x. Recent photograph of Authorized Persons holding an attorney to transact on behalf of the applicant xi. PAN card of beneficial owners of applicant or the equivalent e-document thereof xii. Recent photograph of beneficial owners of applicant xiii. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of beneficial owners of the applicant
Unincorporated Associations or Body of Individuals	<ul style="list-style-type: none"> i. Agreement of Association of Persons or Body of Individuals ii. PAN card of applicant or the equivalent e-document thereof iii. Proof of address of applicant iv. Details of existing credit facilities and charges v. Books of accounts of the applicant for the last three years

	<ul style="list-style-type: none"> vi. Resolution passed by the managing body of the applicant and power of attorney granted by the applicant to its managers, officers, employees or such other persons, as the case may be, to transact on its behalf (“Authorized Persons”) vii. PAN card of Authorized Persons or the equivalent e-document thereof viii. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of Authorized Persons ix. Recent photograph of Authorized Persons holding an attorney to transact on behalf of the applicant x. PAN card of beneficial owners of applicant or the equivalent e-document thereof xi. Recent photograph of beneficial owners of applicant xii. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of beneficial owners of the applicant
Proprietorship	<ul style="list-style-type: none"> i. PAN card of proprietor or the equivalent e-document thereof ii. Proof of address of proprietary firm iii. Details of existing credit facilities and charges iv. Books of accounts of the applicant for the last three years v. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of proprietor vi. Recent photograph of proprietor vii. Any two of the following documents or the equivalent e-document thereof as proof of business in the name of proprietary firm; (a) Registration certificate, (b) certificate/license issued by municipal authorities under Shops and Establishments Acts, (c) sales and income tax returns, (d) GST certificate, (e) certificate/ registration document issued by sales tax/service tax/professional tax authorities, (f) IEC code or license/certificate of practice issued by any professional body incorporated under a statute, (g) complete income tax return (not just acknowledgment) in the name of proprietor reflecting firm’s income, duly authenticated/acknowledged by income tax department, (h) utility bills such as electricity, water, landline telephone bills, etc.
Individuals	<ul style="list-style-type: none"> i. one recent photograph of the applicant

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| | ii. PAN card of applicant or the equivalent e-document thereof

iii. Certified copy of officially valid documents or the equivalent e-document thereof as proof of identity and address of the applicant. |
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Notes:

The term ‘officially valid documents’ shall mean passport, the driving license, 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 containing details of name and address.

In case an ‘officially valid document’ does not contain the updated address, the following documents shall be collected which are deemed to be officially valid documents for the limited purpose of proof of address: (a) utility bill not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill); (b) property or municipal tax receipt; (c) pension or family pension payment orders issued to retired employees by government departments or public sector undertakings, if they contain the address; (d) 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 license agreements with such employers allotting official accommodation. Provided that the applicant shall submit an ‘officially valid document’ containing the current address within three months of submitting the aforementioned documents.

‘Certified copy of officially valid document’ shall have the meaning assigned to it under the ‘Master Direction – Know Your Customer (KYC) Direction, 2025’, as issued by RBI.

“Proof of possession of Aadhaar number” shall be submitted in such form as permitted under the Aadhaar (Targeted Delivery of Financial and Other Subsidies Benefits and Services) Act (including the rules, regulations and notifications issued thereunder) and in compliance with ‘Master Direction – Know Your Customer (KYC) Direction, 2025’ issued by RBI.

“Beneficial Owners” shall mean such persons identified by the applicant in the application form in terms of Rule 9 (3) of the Prevention of Money-laundering (Maintenance of Records) Rules, 2005.

“Equivalent e-document” shall have the meaning assigned to it under the ‘Master Direction – Know Your Customer (KYC) Direction, 2025’ as issued by RBI – i.e., an electronic equivalent of a document issued by the issuing authority of such document with its valid digital signature including documents issued to the

digital locker account of the customer as per rule 9 of the Information Technology (Preservation and Retention of Information by Intermediaries Providing Digital Locker Facilities) Rules, 2025.

Review of Policy: - The Policy is reviewed and recommended by the Audit Committee at its meeting held on 13th February 2026, approved by Board of Directors at its meeting held on 13.02.2026