

DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED

Reg. Off.-IIT-M Research park, Phase I, 10th Floor, Kanagam Village, Taramani, Chennai - 113

DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED	
POLICY	KNOW YOUR CUSTOMER & ANTI-MONEY LAUNDERING POLICY
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DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED

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KNOW YOUR CUSTOMER & ANTI-MONEY LAUNDERING POLICY

1. The Background:

- 1.1. RBI has issued guidelines on Know Your Customer (KYC) standards and Anti-Money Laundering Standards (AML) – 'Prevention of Money Laundering (PML) Act, 2002 vide a circular no. DNBS (PD). CC No 48/10.42/2004-05 dated February 21, 2005 and issued a Master Direction - Know Your Customer (KYC) Direction, 2016 dt. February 25, 2016 (Master Circular) and its subsequent amendments thereto, wherein the RBI has consolidated and updated all the instructions to the KYC standards and AML Standards and repealed all circulars, instructions issued earlier.
- 1.2. The Guidelines issued with the circular are in the context of the recommendations made by the Financial Action Task Force (FATF) on anti-money laundering standards. Compliance with these standards by all NBFCs registered with RBI has become imperative. These Guidelines lay down the minimum requirements/disclosures to be made in respect of clients.
- 1.3. Section 12 of PML Act 2002 places certain obligations on every banking company, financial institution and intermediary which include
 1. Every reporting entity shall
 - a. Maintain a record of all transactions, including information relating to transactions covered under clause (b) , in such manner as to enable it to reconstruct individual transactions
 - b. furnish to the Director within such time as may be prescribed, information relating to such transactions, whether attempted or executed, the nature and value of which may be prescribed
 - c. maintain record of documents evidencing identity of its clients and beneficial owners as well as account files and business correspondence relating to its clients
 2. Every information maintained, furnished or verified, save as otherwise provided under any law for the time being in force, shall be kept confidential
 3. The records referred to in clause 1 (a) shall be maintained for a period of five years from the date of transaction between a client and the reporting entity.
 4. The records referred to in clause 1 (c) shall be maintained for a period of five years after the business relationship between a client and the reporting entity has ended or the account has been closed, whichever is late.
- 1.4. This policy document is based on the RBI Guidelines and policy framework but amended at places to suit specific requirements of DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED ("**DVARA KGFS or Company**")

2. Preamble:

Through the following Policy Guidelines, Dvara Kshetriya Gramin Financial Services Private Limited stands committed to –

- 2.1. Accept only those clients whose identity is established by conducting due diligence appropriate to the risk profile of the Customer.
- 2.2. Record and preserve audit trail for the transactions conducted by Customers to facilitate investigation.

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2.3. Report to Financial Intelligence Unit – India, or any other agency designated by Government of India / Regulatory Authorities, the details of transactions of all or selected clients if and when requested or at regular frequency as may be suggested by such agencies, and

2.4. Cooperate with investigative agencies / law enforcement agencies in their efforts to trace the money laundering transactions and persons involved in such transactions.

3. The Objective:

3.1. To prevent 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, thereby avoiding prosecution, conviction and confiscation of the criminal funds.

3.2. To enable the Company to know/understand the customers and their financial dealings better, which in turn would help the Company to manage risks prudently.

3.3. To put in place appropriate controls for detection and reporting of suspicious activities in accordance with applicable laws/laid down procedures.

3.4. To comply with applicable laws and regulatory guidelines.

4. The Approach:

4.1. The approach towards KYC Standards is based on risk perception and money laundering threats that may be posed by different types of Customers. DVARA KGFS shall be largely guided by the KYC standards prescribed by RBI for NBFCs.

4.2. KYC Standards & AML measures involve a customer acceptance policy and customer identification programme (as stated in clause 6 and 7 given hereinafter) that involves enhanced due diligence for higher risk accounts, and includes account monitoring for suspicious activities. These standards constitute an essential part of risk management by providing the basis for identifying and controlling risk exposures, which DVARA KGFS takes to protect itself and its genuine Customers from the risks arising out of Suspicious Transactions/ risky Customers.

5. Definitions:

For the purpose of this policy,

5.1. **“Customers or Clients”** means any entity either in the form of a company, partnership firm, limited liability partnership, sole proprietorship or any individual.

5.2. **“Eligibility Criteria”** means Eligibility Criteria of DVARA KGFS as approved by the Board from time to time.

5.3 **“officially valid documents”** shall be the following documents;

- i. the passport,
- ii. the Driving license,
- iii. the Voter’s Identity Card issued by Election

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- iv. Commission of India, job card issued by NREGA duly signed by an officer of the State Government,
- v. Letter issued by the National Population Register containing details of name and address.

in case the OVD furnished by the customer does not contain updated address, the following documents 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, postpaid 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 or Central Government departments, statutory or regulatory bodies, public sector undertakings, scheduled commercial banks, financial institutions and listed companies. Similarly, leave and license agreements with such employers allotting official accommodation; and
- v. Documents issued by Government departments of foreign jurisdictions and letter issued by Foreign Embassy or Mission in India.

5.4. **“Suspicious Transaction”** as determined by the Prevention of Money Laundering Act, 2002 and the Rules notified thereunder under 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 proceeds of an offence specified in the Schedule to the Act, regardless of the value involved; or
- b) Appears to be made in circumstances of unusual or unjustified complexity; or
- c) Appears to have no economic rationale or bonafide purpose.
- d) gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism;

5.5 **“Money Laundering**

Section 3 of the Prevention of Money Laundering {PML} Act 2002 has defined the “offence of money laundering” as under:

“Whoever directly or indirectly attempts to indulge or knowingly assists or knowingly is party or is actually involved in any process or activity connected with the proceeds of crime and projecting it as untainted property shall be guilty of offence of money laundering”.

5.6 **Record Management**

Record Management includes updated records with respect to identification data, account files, business correspondence and results of any analysis undertaken.

6. **Customer Acceptance Policy (“CAP”):**

Before accepting a Customer, DVARA KGFS shall ensure the following:

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- 6.1. Any new Customer shall only be accepted after ascertaining the Eligibility Criteria through the due-diligence process.
- 6.2. All customers are classified as low, medium and high risk based on the nature of business activity, location of Customer and their clients, mode of payments, volume of turnover, social and financial status and other such categories as applicable.
- 6.3. The various documents and other information to be collected from different categories of Customers depending on perceived risk as per the classification above and the requirements of Prevention of Money Laundering Act, 2002 and guidelines issued by Reserve Bank from time to time is given in Annexure I;
- 6.4. DVARA KGFS shall conduct necessary checks with the watch list of the RBI and any other subsequent lists before accepting a new Customer (i.e.before checker 2 verification) 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 etc. Where the company is suspicious of money laundering or terrorist financing and it reasonably believes that performing CDD process will tip-off the customer, it will file the Suspicious Transaction report with FIU.
- 6.5. DVARA KGFS shall prepare a brief customer profile on all its Customers. The customer profile may contain information relating to Customer's identity, social/financial status, nature of business activity, information about the Customer's business and their location etc. The customer profile will be a confidential document and details contained therein shall not be divulged for cross selling or any other purposes except to carry out statutory obligations / orders of courts/ tribunals.
- 6.6 DVARA KGFS (either through itself or through its service provider), prior to registration of any individual and/or person (legal and natural) as its customer, is mandated to check/verify/validate every customer against the financial sanctions list of United Nations, European Union and France, which:
 - (i) **As regards the United Nations**, the lists may be consulted at the following address:
<http://www.un.org/french/sc/committees/1267/consolist.shtml>(Taliban/AlQaida);
<http://www.un.org/french/sc/committees/1737/index.shtml> (Iran); and
<http://www.un.org/Docs/sc/committees/INTRO.htm>;
 - (ii)**As regards the European Union**, the lists may be consulted at the following address:
http://eeas.europa.eu/cfsp/sanctions/consol-list_en.htm
 - (iii) **As regards France**, the lists may be consulted at the following address:
http://www.tresor.economie.gouv.fr/4248_liste-nationale
 - iv) Individuals listed under Procedure for Implementation of Section 12A of the Weapons of Mass Destruction (WMD) and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005. ("WMD Act, 2005").
 - v) UNSCR 1718 Sanctions List of Designated Individual and Entities

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<https://www.mea.gov.in/Implementation-of-UNSC-Sanctions-DPRK.htm>,

In the event that Company comes across a Person listed in the financial sanctions list as stated above, it shall follow the same reporting procedure as stated in Clause 9 below.

7. Customer Identification Procedure ("CIP"):

7.1. For Customers that are corporates or other entities, DVARA KGFS shall

- i. verify the legal status of the corporate / other entity through proper and relevant documents
- ii. 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,
- iii. Obtain sufficient information in order to identify persons which beneficially own or have substantial control over such corporate / other entity. DVARA KGFS will also obtain all the KYC documents as per Annexure II of the beneficial owner. (The list of acceptable KYC documents is available in Annexure II).

7.2. DVARA KGFS shall verify the Customer's identity (including the beneficial owner's identity) using reliable, independent source documents, data and information, as made available. The following entities are exempted from identification shareholder or Beneficial Owner:

- (i) an entity listed on a stock exchange in India, or
- (ii) is an entity resident in jurisdictions notified by the Central Government and listed on stock exchanges in such jurisdictions, or,
- (iii) is a subsidiary of such listed entities.

7.3. DVARA KGFS 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.

7.4. DVARA KGFS shall provide Customers with adequate notice to provide DVARA KGFS with necessary information to verify the identity of the Customer.

7.5 Video Based Customer Identification Process (V-CIP)

Video based customer identification process (V-CIP) is a method of customer identification by an official of the Company by undertaking secure, real-time, consent based audio-visual interaction with the customer to obtain identification information including the documents required for Customer Due Diligence (CDD) purpose, and to ascertain the veracity of the information furnished by the customer.

The Company may undertake live V-CIP for establishment of an account based relationship with an individual customer after obtaining his informed consent and adhering to the procedures prescribed

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in RBI regulations. This process shall be treated as face to face process for the purpose of customer identification.

7.6 Collection and Storing of Biometric

Biometric based KYC authentication can be done by Company official/business correspondents/business facilitators. Customer consent shall be taken to providing his/her Aadhaar number, Biometric and/or One Time Pin (OTP) data (and/or any similar authentication mechanism) for the purposes of KYC for enrolment, disbursement of loan and for availing other services offered by the Company. The Biometrics and/or OTP and/or any other authentication mechanism that customer provides for authentication shall be used only for authenticating his/her identity for that specific business purposes or for other related purposes designated by the Company or for a lawful purpose to comply with the applicable laws and regulations.

7.7 Periodic Updation

Periodic updation of KYC of customers 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 from the date of opening of the account / last KYC updation.

Risk based approach for periodic updation of KYC to be adopted. The Board approved Risk Categorisation framework is attached as Annexure III.

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 through customer's mobile number/ e-mail ID registered with the Company.

Change in KYC Information: In case of change in KYC information, company shall undertake the KYC process equivalent to that applicable during on-boarding of new customers. In case of any update in the documents submitted, the information shall be submitted by the Customer within 30 days of the update to the documents for the purpose of updating the records by the Company.

7.8 The Customers shall be allotted Unique Customer Identification Code (UCIC)

8. Existing Customers:

8.1. The requirements of the earlier sections are not applicable to transactions conducted prior to, on or after the effective date of this Manual by existing Customers, provided that DVARA KGFS has previously verified the identity of the Customer and DVARA KGFS 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.

9. Reporting:

9.1. DVARA KGFS does not accept deposits and the internal policies of DVARA KGFS do not permit cash transactions with a value of Rs. 10 lakhs and more. Nevertheless, if there were to be any

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such transactions in future, the business processes shall have a system of internal reporting of Suspicious Transactions and cash transactions of Rs. 10 lakhs and above, 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;

9.2. Further, the Principal Official shall furnish information of the above mentioned transactions to the Director, Financial Intelligence Unit – India (FIU-IND) at the prescribed address in the formats prescribed in this regard including the electronic filing of reports.

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

9.4. Counterfeit Currency Report shall be filed for all such cash transactions where forged or counterfeit Indian currency notes have been used as genuine, for each month by 7th of the succeeding month.

10. Records Retention:

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

10.1. Transactions for which records need to be maintained:

- i. All cash transactions of the value of more than Rs.10 lakh or its equivalent in foreign currency.
- ii. All series of cash transactions integrally connected to each other which have taken place in a single month and where the aggregate value of these transactions exceeds Rs.10 lakhs or its equivalent foreign currency.
- iii. 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.
- iv. All Suspicious Transactions whether or not made in cash.

10.2. Information to be preserved:

The information required to be preserved with respect to the above transactions is 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 transactions related documents.

10.3. Periodicity of retention:

The following records shall be retained for a minimum period of Five years from the date of the relevant transaction:

- i) The Customer identification information and residence identification information including

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the documentary evidence thereof.

- ii) All other necessary records pertaining to the transactions that could be produced as evidence for prosecution of persons involved in criminal activity.
- iii) 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 Ten (10) years after such record was created.
- iv) The above records shall be made available to the competent authorities upon request.

11. Enhanced Due Diligence:

- 11.1. DVARA KGFS 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.
- 11.2. The extant guidelines of DVARA KGFS in respect of its Customers ensure that the Company is not transacting with such high risk Customers.
- 11.3. 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.
- 11.4. DVARA KGFS may engage appropriate outside investigative services or consult appropriate vendor sold databases, wherever needed/necessary.
- 11.5. DVARA KGFS 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.
- 11.6. DVARA KGFS shall verify the current address through positive confirmation before allowing operations in the account, PAN shall be obtained from the customer and shall be verified and validated. Customers shall be categorized as high-risk customers and accounts opened in non-face to face mode shall be subjected to enhanced monitoring until the identity of the customer is verified in face-to-face manner or through V-CIP.

12. Monitoring of Transactions:

On-going monitoring is an essential element of effective KYC procedures.

- 12.1. DVARA KGFS should effectively control and reduce the risk 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.
- 12.2. The Company should pay special attention to all complex, unusually large transactions and all unusual patterns, which have no apparent economic or visible lawful purpose. High-risk customers have to be subjected to intensified monitoring.
- 12.3. DVARA KGFS shall periodically review and determine the need for applying enhanced due diligence measures based on the risk categorization of customers.

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13. Risk Management:

- 13.1. DVARA KGFS internal audit and compliance functions have an important role in evaluating and ensuring adherence to the KYC policies and procedures.
- 13.2. The compliance in this regard may be put up before the Board on regular intervals.
- 13.3. DVARA KGFS shall have an on-going employee training programme so that the members of the staff conducting the KYC are adequately trained in KYC procedures. It is crucial that all concerned staff fully understand the rationale behind the KYC policies and implement them consistently.
- 13.4. DVARA KGFS will undertake ML/TF Risk assessments prior to the launch of new products, processes, services and technologies.
- 13.5. The Head of Operations and the Chief Audit Officer will be the Senior Management responsible for overseeing KYC Compliance processes and ensuring effective implementation of policies and procedures.

14. Customer Education:

DVARA KGFS, if need be, may prepare specific literature/ pamphlets etc. so as to educate the customer of the objectives of the KYC programme.

15. Applicability to branches and subsidiaries outside India:

- 15.1. Presently, DVARA KGFS does not have any branch and subsidiaries outside India. However, if DVARA KGFS 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, DVARA KGFS 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.

16. Appointment of Designated Director & Principal Officer:

- 16.1. The Managing Director or a Whole-time Director or any other official duly authorised by the Board of Directors of the Company shall be designated as “Designated Director” for the purpose of compliance with the PML Act and Rules.
- 16.2. The Company Secretary / Chief Compliance Officer shall be designated as Principal Officer for the purpose of compliance with the rules and regulations of this policy. The Principal Officer can be contacted at the following address:

Dvara Kshetriya Gramin Financial Services Private Limited.
IIT-M Research Park; Phase 1; 10th Floor;
Taramani, Chennai – 600 113
PH: 044 6668 7000

- 16.3. The details of the Designated Director and Principal Officer will be communicated to FIU-IND and the RBI.

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16.4. The Principal Officer shall be responsible for monitoring and reporting of all transactions and sharing of information as required under the law.

17. Review

17.1. A review of this policy would be done on an annual Basis by the Board of Directors.

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ANNEXURE I

Customer Identification Requirements (CIR)

A) Transactions with trust/nominee or fiduciaries

1. There exists the possibility that trust/nominee or fiduciary accounts can be used to circumvent the CIR.
2. Dvara Kshetriya Gramin Financial Services Private Limited would determine whether the customer is acting on behalf of another person as trustee/nominee or any other intermediary. If so, Dvara Kshetriya Gramin Financial Services Private Limited 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, Dvara Kshetriya Gramin Financial Services Private Limited should 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. Dvara Kshetriya Gramin Financial Services Private Limited needs to be vigilant against business entities being used by individuals as a 'front' for conducting transactions with the Company.
2. Dvara Kshetriya Gramin Financial Services Private Limited would 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. Dvara Kshetriya Gramin Financial Services Private Limited should 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. Dvara Kshetriya Gramin Financial Services Private Limited would verify the identity of the person and seek information about the sources of funds before accepting the PEP as a Customer.
4. Dvara Kshetriya Gramin Financial Services Private Limited should also subject such transactions enhanced monitoring on an on-going basis. The above norms may also be applied to transactions with the family members or close relatives of PEPs.

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ANNEXURE II

Customer Identification Procedure

Features to be verified and documents that may be obtained from Customers

Features	Documents
For Individuals* (for proof of identity and address)	<u>Individuals eligible for enrolment of Aadhaar</u> 1. Aadhaar number/ Proof of application of enrolment for Aadhaar wherein the enrolment is not older than 6 months, and 2. Permanent Account Number/Form No. 60 3. Certified copy of an OVD containing details of identity and address and one recent photograph 4. Officially Valid Documents are 5. Proof of possession of Aadhaar 6. Passport 7. Driving License 8. Voters Identity Card issued by Election Commission of India 9. NREGA Card duly signed by State Government Officer 10. Letter issued by National Population Register with name and address. (Aadhaar Number to masked) <u>Individuals Not eligible for enrolment of Aadhaar</u> 1. PAN / Form No. 60 2. One recent photograph and 3. A certified copy of an OVD containing details of identity and address
For Individuals* (if OVD furnished by the customer does not contain updated address) (for proof of address)	In case the identity information relating to the Aadhaar number/Permanent Account Number/ OVD furnished by the customer does not contain updated address, the following documents shall be deemed to be OVDs for 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

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Features	Documents regulatory bodies, public sector undertakings, scheduled commercial banks, financial institutions and listed companies and leave and licence agreements with such employers allotting official accommodation. Provided the customer shall submit Aadhaar or OVD updated with current address within a period of three months of submitting the above documents *Explicit customer consent to be obtained to download KYC records from CKYCR.
For Proprietorship Concerns	(a) Registration certificate. (b) Identification information as mentioned under Section 15 in respect of the person holding an attorney to transact on its behalf. (e) the names of all the partners (f) address of the Registered Office and the principal place of business, if it is different. Certificate/ license issued by the Municipal authorities under Shops & Establishment Act Sales & Income Tax Returns GST Certificate (To be validated by RE) Income Tax Return Utility bills (electricity, water, landline telephone bills, mobile bills) – less than 6 months old.
For Companies	(a) Certificate of incorporation. (b) Memorandum and Articles of Association. (c) A resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf. (d) Identification information as mentioned under Section 15 in respect of managers, officers or employees holding an attorney to transact on its behalf. (e) The names of the relevant persons holding senior management position. (f) address of the Registered Office and the principal place of business, if it is different. PAN of the Company OVD of Managers, Officers and employees/ authorised officials.
For Trusts & Foundations <u>Information required:</u> - Names of trustees, settlers, beneficiaries and signatories - Names and addresses of the founder, the managers/directors	i. Certificate of registration, if registered ii. Power of Attorney granted to transact business on its behalf iii. Any officially valid document to identify the trustees, settlors, beneficiaries and those holding Power of Attorney, founders/managers/ directors and their addresses iv. Trust Deed v. Resolution of the managing body of the foundation/association

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Features and the beneficiaries	Documents two OVD documents which provides customer information to (any the satisfaction of Dvara Kshetriya Gramin Financial Services Private Limited will suffice) vi. The names of the beneficiaries, trustees, settlor and authors of the trust. vii. The address of the registered office of the trust viii. List of the trustees and documents, as specified in CDD measures for individuals, for those discharging role as trustee and authorised to transact on behalf of the trust. ix. In case of Non-Profit organisations, the details of registration on the DARPAN Portal of NITI Aayog shall be obtained.
For Societies <u>Information required:</u> - Names of Society, - Names and addresses of the founder, the governing members/directors	i. Certificate of registration under the society Act ii. Society bye-laws as modified by the organisation iii. FCRA Certificate iv. Power of Attorney granted to transact business on its behalf v. Any officially valid document to identify the holding Power of Attorney, founders/managers/ directors and their addresses vii. Resolution of the governing body of the society (any two documents which provides customer information to the satisfaction of Dvara Kshetriya Gramin Financial Services Private Limited will suffice) vi. Document showing name of the person authorised to act on behalf of the entity vii. List of the documents, as specified in CDD measures for individuals, for the person holding an attorney to transact on its behalf viii. Such documents as may be required by the Company to establish the legal existence of such entity/ judicial person.
Partnership Firm	(a) Registration certificate. (b) Partnership deed. (c) Identification information as mentioned under Section 15 in respect of the person holding an attorney to transact on its behalf. (e) the names of all the partners (f) address of the Registered Office and the principal place of business, if it is different. PAN of the partners OVD of all the partners

Any information requirement obtained apart from the above, will be obtained with the explicit consent of the customer.

GST Numbers, shall be verified through search/ verification facility provided by the issuing authority.

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ANNEXURE II

Product Specific KYC Requirements



Know Your Customer
Process.docx



Final Risk
Categorisation Model

ANNEXURE III – Risk Categorisation Framework