

Arohan Financial Services Limited

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

Version 10.1



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Contents

1. Introduction	3
2. Definitions:.....	3
3. Objectives.....	6
4. Applicability.....	6
5. Preventive Measures	6
6. A. Standard KYC Procedure	8
6 B. Procedure for obtaining Identification Information	9
7. Reliance on Third party for Customer Due Diligence.....	11
8. Risk categorization of customers	12
9. Identification of Beneficial Owner	13
10. Monitoring of transactions	13
11. Maintenance of records.....	13
12. Preservation of Records.....	14
13. Combating Financing of Terrorism.....	15
14. Reporting to Financial Intelligence Unit - India	16
15. Internal Control System	17
16. Principal Officer and Designated Director	18
18. CDD Procedure and sharing KYC information with Central KYC Records Registry (CKYCR)	19
19. CST and STR Process through software	20
20. Other Requirements	21
21. Conclusion	21
Annexure 1: Officially Valid Documents for other business segments of Arohan.....	22

1. Introduction

Arohan Financial Services Limited hereinafter referred to as Company or Arohan, recognizes its role as a corporate entity and endeavors to adopt the best practices with the highest standards of governance through transparency in business ethics, accountability to its customers, government and others.

This Anti–Money Laundering (AML) and Know your customer (KYC) policy is thus being designed in lines with **“AML RBI JULY1, 2015 NBS Master Circular no DNBR (PD) CC no. 051-03.10.119-2015-16”**, **“Master Direction DBR.AML.BC.No.81/14.01.001/2015-16”** and the guidelines mentioned therein, as amended from time to time.

Arohan is committed to highest standards of AML, Counter Terrorism Financing (CFT), Anti –Fraud and other punishable criminal acts. The Board of Directors, Management and all employees shall adhere to these standards to protect the Company and its reputation from being misused for money laundering and/or terrorist financing or other illegal purposes.

2. Definitions:

“Aadhaar number”, as defined in the Aadhaar and Other Law (Amendment) Ordinance, 2019, means an identification number issued to an individual under sub-section (3) of section 3 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 (18 of 2016), and includes any alternative virtual identity generated under sub-section (4) of that section.”

“Authentication”, in the context of Aadhaar authentication, means the process as defined under sub-section (c) of section 2 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016.”

“Certified Copy of OVD” - Obtaining a certified copy by regulated entity shall mean comparing the copy of officially valid document so produced by the customer with the original and recording the same on the copy by the authorised officer of the regulated entity.

- Provided that in case of Non-Resident Indians (NRIs) and Persons of Indian Origin (PIOs), as defined in Foreign Exchange Management (Deposit) Regulations, 2016 {FEMA 5(R)}, alternatively, the original certified copy of OVD, certified by any one of the following, may be obtained: authorised officials of overseas branches of Scheduled Commercial Banks registered in India,
- branches of overseas banks with whom Indian banks have relationships,
- Notary Public abroad,
- Court Magistrate,
- Judge,
- Indian Embassy/Consulate General in the country where the non-resident customer resides.

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“Offline Verification”, as defined in the Aadhaar and Other Law (Amendment) Ordinance, 2019, means the process of verifying the identity of the Aadhaar number holder without authentication, through such offline modes as may be specified by the Aadhaar regulations.

“Know Your Customer (KYC)” is defined as the process by which Financial Institutions (FI) obtain information about the identity and address of the customers. This process helps to ensure that FI’s services are not misused, intentionally or unintentionally by criminal elements for money laundering.

“Money Laundering” is defined as direct or indirect attempts to indulge or knowingly assist or knowingly be a party or be actually involved in any process or activity connected with the proceeds of crime and projecting it as untainted property.

“Proceeds of crime” means any property derived or obtained, directly or indirectly, by any person as a result of criminal activity relating to scheduled offence or the value of any such property.”

“Customer” is defined for the purpose of KYC Norms, as a person who is engaged in a financial transaction or activity with a reporting entity and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting.

“Group” – The term “group” shall have the same meaning assigned to it in clause (e) of sub-section (9) of section 286 of the Income-tax Act, 1961 (43 of 1961).

“Transaction” is defined as a purchase, sale, loan, pledge, gift, transfer, delivery or the arrangement thereof and includes- opening of an account, 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, any payment made or received in whole or in part of any contractual or other legal obligation and establishing or creating a legal person or legal arrangement.

“Senior Management” shall mean any person holding the position of CXOs and Head of Credit in the Company and shall be acting either severally or jointly for the purpose of KYC compliance.

“Suspicious Transaction” means a “transaction” as defined below, including an attempted transaction, whether or not made in cash, which, to a person acting in good faith

- 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 not have economic rationale or bona-fide purpose; or
- d. gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

Politically Exposed Persons” (PEPs) are individuals who are or have been entrusted with prominent public functions by a foreign country, including the Heads of States/Governments, senior politicians, senior government or judicial or military officers, senior executives of state-owned corporations and important political party officials.

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Non-profit organisations” (NPO) means any entity or organisation, constituted for religious or charitable purposes referred to in clause (15) of section 2 of the Income-tax Act, 1961 (43 of 1961), that is registered as a trust or a society under the Societies Registration Act, 1860 or any similar State legislation or a company registered under Section 8 of the Companies Act, 2013 (18 of 2013).

Beneficial Owner (BO)

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.

Explanation- For the purpose of this sub-clause-

1. “Controlling ownership interest” means ownership of/entitlement to more than 10 percent of the shares or capital or profits of the company.
2. “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 10 percent of capital or profits of the partnership or who exercises control through other means.

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 percent of the property or capital or profits of the unincorporated association or body of individuals.

Explanation: 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 percent 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.

“Principal Officer” means an officer at the management level nominated by the RE, responsible for furnishing information as per rule 8 of the Rules.

“Customer Due Diligence (CDD)” means identifying and verifying the customer and the beneficial owner using reliable and independent sources of identification.

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- (a) Explanation – The CDD, at the time of commencement of an account-based relationship or while carrying out occasional transaction of an amount equal to or exceeding rupees fifty thousand, whether conducted as a single transaction or several transactions that appear to be connected, or any international money transfer operations shall include: Identification of the customer, verification of their identity using reliable and independent sources of identification, obtaining information on the purpose and intended nature of the business relationship, where applicable;

Taking reasonable steps to understand the nature of the customer's business, and its ownership and control;

- (b) Determining whether a customer is acting on behalf of a beneficial owner, and identifying the beneficial owner and taking all steps to verify the identity of the beneficial owner, using reliable and independent sources of identification.

3. Objectives

The objective of this KYC/AML/CFT policy is to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by complying with all applicable requirements under the applicable regulatory bodies and its regulations. Thus, Arohan aims to establish adequate procedures and internal controls to ensure compliance with all applicable regulations.

4. Applicability

All the monetary transactions between Arohan and other parties (including its customer) will be covered under this policy. The management of Arohan as well as a Board of Directors are responsible to ensure adherence of the provisions mentioned in this policy. All the employees of Arohan shall come under the purview of this policy.

This policy will be effective from the date of approval by the Board of Directors of the company.

5. Preventive Measures

The minimum standards shall be specific procedures for Customer identification, Know Your Customer, Household and/or Business verification, Referral check and Credit Bureau checks. All the employees shall be responsible to identify and report unusual and suspicious activity revealed during the following processes:

- Customer Acceptance Policy (CAP): Clear customer acceptance policies and procedures shall be defined in the operational policies/manual in lines to the guidelines specified in the Master Direction DBR. AML. BC. No. 81/14.01.001/2015-16; dated February 25, 2016, as amended from time to time.
- Customer Identification: The Customer identification procedure (CIP) shall be defined in the operational policies/manual in lines to the guidelines specified in the Master Direction DBR.

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AML. BC. No. 81/14.01.001/2015-16; dated February 25, 2016, as amended from time to time.

- In order to identify customers, recent photos of the customer will be collected and the same will be verified during household and/or Business verification.
- KYC documentation: The operation process shall be designed to ensure that the norms of RBI & MFIN, related to the KYC documentation are adhered. The KYC documents shall be preserved systematically as per guidelines of the RBI.
- Household and/or Business verification: Verification of customers for any form of financial services from Arohan, will be done at either their home (preferably) and/or their place of business.
- Reference Check: Before granting any credit facility to the proposed customers, reference check shall be done. The feedback of the reference shall be documented.
- Credit Bureau Check: Before granting any credit facility, credit worthiness of the proposed customers shall be checked through Credit Bureaus. The Credit bureau report shall be kept along with the loan documents for future reference & scrutiny.
- Recording in MIS: Relevant information related to the individual customers shall be recorded in the MIS system while account creation and before making any financial transaction.
- Hiring of employees: At the time of recruiting, the KYC norms/AML standards/ CFT measures shall be adhered to and adequate screening mechanism will be exercised. The KYC documents of employees will be collected by the Human Resource Department. In addition, in the case of recruitment of field staff, household verification will also be conducted within 30 days from the date of his/her joining. If any unusual and suspicious activity comes into notice the same will be reported immediately to the Principal/Compliance Officer.
- Training: Employee training programme shall be introduced to adequately train employees in AML/KYC/CFT policy. The training will be designed according to the different job roles & requirements for frontline staff, compliance staff and staff dealing with new customers.
- Properly staffing the audit function with persons adequately trained and well-versed in AML/KYC/CFT policies of Arohan, regulation and related issues shall be ensured.
- Technology requirements: The IT systems of Arohan shall be enabled with features to generate/ throw alerts when the transactions are inconsistent with the risk categorization and profile of the customers. The software shall be enabled to generate alerts for effective identification and reporting of suspicious transactions.
- Fund raising: While entering in to a deal for raising funds from anybody, other than a Bank or recognized Financial Institution the management of Arohan shall also do sufficient due diligence before signing the agreement. Any unusual and suspicious activity, if noticed, shall also be reported to the Compliance Officer.

The Management of Arohan as well as Board of Directors are responsible to ensure that the above-mentioned conditions shall be considered while designing/revising any policy related to any financial products.

6. A. Standard KYC Procedure

The KYC procedure shall be completed while opening loan accounts and also has to be periodically updated. Arohan shall design and follow the KYC policy in line with the guidelines issues by the RBI and MFIN from time to time.

- At a minimum, two standard KYC documents need to be collected and captured in MIS. Staff or Representative of Arohan shall ensure that all photocopies are certified by the customer (by signing/thumb impression on them). The Staff or Representative of Arohan shall also verify photocopies against the original and put a stamp on the photocopies marking “Original Seen & Verified”, with his/her employee ID and sign it.
- KYC for the MFI segment: The KYC IDs shall be as per guidelines of RBI and MFIN. The Operational manual and policies shall also be in lines to these RBI and MFIN guidelines as updated from time to time. KYC for other lending segments: Refer Annexure 1

Updation of KYC: KYC exercise shall be done at the time of opening accounts of customers. Updation of KYC shall be done at least every two years for high risk customers, every eight years for medium risk customers and every ten years for low risk customers or every time facility is renewed/ replenished, whichever is earlier. KYC documents shall be preserved for at least 8 years after loan closure. Further, the identification records and transaction data shall be made available to the competent authorities upon request. Arohan 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 Arohan 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 Arohans' end.

- A Unique Customer Identification Code (UCIC) shall be issued to identify the customers, avoid multiple identities, track the facilities availed, monitor financial transactions in a holistic manner and enable a better approach to risk profiling of customers. Arohan shall allot UCIC while entering into new relationships with individual customers as also the existing customers.
- In case of KYC document changes / updation, the physical copies of these KYC documents shall also be obtained from the customers in lines of compliance to the RBI and MFIN guidelines.
- Arohan shall also additionally submit the KYC data to the Credit Information Companies at a frequency and format as stipulated by RBI and MFIN or any other regulatory authority, which comes into force post implementation of this policy.

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“Digital KYC” has been defined in Section 3 as capturing live photo of the customer and officially valid document or the proof of possession of Aadhaar, where offline verification cannot be carried out, along with the latitude and longitude of the location where such live photo is being taken by an authorised officer of the Reporting Entity (RE) as per the provisions contained in the Act. Steps to carry out the Digital KYC process have also been stipulated.

- “Equivalent e-document” has been defined in Section 3 as 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, 2016.

6 B. Procedure for obtaining Identification Information

For undertaking CDD, Arohan shall obtain the following information from an individual while establishing an account based relationship or while dealing with the individual who is a beneficial owner, authorised signatory or the power of attorney holder related to any legal entity:

- a) From an individual who is eligible for enrolment of Aadhaar, the Aadhaar number; the Permanent Account Number (PAN) or Form No. 60 as defined in Income-tax Rules, 1962, as amended from time to time;
Provided, where an Aadhaar number has not been assigned to an individual, proof of application of enrolment for Aadhaar shall be obtained wherein the enrolment is not older than 6 months and in case PAN is not submitted, certified copy of an OVD containing details of identity and address and one recent photograph shall be obtained.
Provided further, that from an individual, who is a resident in the State of Jammu and Kashmir or Assam or Meghalaya, and who does not submit Aadhaar or proof of application of enrolment for Aadhaar, the following shall be obtained:
 - i. certified copy of an OVD containing details of identity and address and
 - ii. one recent photograph
- b) From an individual who is not eligible to be enrolled for an Aadhaar number, or who is not a resident, the following shall be obtained
 - i. PAN or Form No. 60 as defined in Income-tax Rules, 1962, as amended from time to time.
 - ii. one recent photograph and
 - iii. A certified copy of an OVD containing details of identity and address.

Provided that in case the OVD submitted 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.

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Provided further that, while opening accounts of legal entities as specified in part III of this Master Direction, in case, PAN of the authorised signatory or the power of attorney holder is not submitted, the certified copy of OVD of the authorised signatory or the power of attorney holder shall be obtained, even if such OVD does not contain address.

- (c) In case the identity information relating to the Aadhaar number or Permanent Account Number submitted by the customer does not have current address, an OVD as defined in section 3(a) (xiv) shall be obtained from the customer for this purpose.

“Provided that 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, 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;

Provided further that the customer shall submit Aadhaar or OVD updated with current address within a period of three months of submitting the above documents.”

- (d) In case the customer eligible to be enrolled for Aadhaar and obtain a Permanent Account Number, referred to in Section 15(a) above, does not submit the Aadhaar number or the Permanent Account Number/ form 60 at the time of commencement of an account based relationship with Arohan, the Customer shall submit the same within a period of six months from the date of the commencement of the account based relationship. In case the customer fails to submit the Aadhaar number or Permanent Account Number/form 60 within the aforesaid six months period, the said account shall cease to be operational till the time the Aadhaar number and Permanent Account Number/ form 60 is submitted by the customer.
- (e) Arohan shall duly inform the customer about this provision while opening the account.
- (f) The customer, eligible to be enrolled for Aadhaar and obtain the Permanent Account Number, except one who is a resident in the State of Jammu and Kashmir or Assam or Meghalaya, already having an account based relationship with REs, shall submit the Aadhaar number and Permanent Account Number/ form 60 by such date as may be notified by the Central Government. In case the customer fails to submit the Aadhaar number and Permanent Account Number/form 60 by such date, the said account shall cease to be operational till the

time the Aadhaar number and Permanent Account Number/form 60 is submitted by the customer.

Provided Arohan shall serve at least two notices for the compliance before such date.

- (g) Arohan shall ensure that introduction is not to be sought while opening accounts.

“Officially Valid Document” (OVD) means the passport, the driving licence, 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, letter issued by the National Population Register containing details of name and address. Explanation 1.-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.

- (h) Arohan 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, 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, etc.

7. Reliance on Third party for Customer Due Diligence

For the purpose of verifying the identity of customers at the time of commencement of an account-based relationship, Arohan, shall at their option, rely on customer due diligence done by a third party, subject to the following conditions:

- a. Records or the information of the customer due diligence carried out by the third party is obtained immediately from the third party or from the Central KYC Records Registry.
- b. Adequate steps are taken by Arohan to satisfy itself that copies of identification data and other relevant documentation relating to the customer due diligence requirements shall be made 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 PML Act.
- d. The third party shall not be based in a country or jurisdiction assessed as high risk.
- e. The ultimate responsibility for customer due diligence and undertaking enhanced due diligence measures, as applicable, will be with Arohan.

8. Risk categorization of customers

Customers in Arohan shall be categorized into various risk categories. This risk categorization shall apply to all the customers under the operational business segments under Arohan – MFI and other lending segments. The risk categorization shall be reviewed at Executive committee level on a half yearly basis in order to timely identify and meet the need of enhanced due diligence measures.

The customers of Arohan will be categorized into low, medium and high risk category based on their assessment and risk perception.

a. Low Risk Customers:

Individuals (other than High Net Worth) and entities, whose identity and source of income, can be easily identified and customers in whose accounts the transactions confirm to a known profile, would be categorized as low risk. This shall include customers or entities operating in industry segments not mentioned under the negative list / caution profiles as defined by the existing Credit Policies of Arohan and/or Operational manual and policies.

Illustrative examples include, people belonging to lower economic strata, such as those funded under the category of Microfinance customer segments & Micro Enterprise Loan customer segment as defined in Arohan's Operations Manual, salaried employees and pensioners, government departments and government owned companies, regulators and statutory bodies, etc. Further, Non-Profit Organizations (NPOs)/ Non-Government Organizations (NGOs) promoted by the United Nations or its agencies, and such international/ multilateral organizations of repute, shall be classified as low risk customers.

b. Medium Risk Customers:

Individuals and entities who are listed under the negative list / caution profiles as defined by the existing Credit Policies of Arohan and/or Operational manual and policies, shall be categorized as Medium risk customers.

Illustrative examples include Jewellers, Taxi Operators, etc.

Non-Profit Organizations (NPOs)/ Non-Government Organizations (NGOs) not promoted by the United Nations or its agencies shall be classified as medium risk customers.

c. High Risk Customers:

High Net worth individuals and entities, who are likely to pose a higher than average risk would be categorized as high risk depending on the background, nature and location of activity, country of origin, sources of funds, customer profile, etc.

Customers requiring very high level of monitoring, e.g., Politically Exposed Persons (PEPs) of foreign origin, shall also be categorized as high risk.

9. 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 his/her identity shall be undertaken keeping in view the following:

- a. Where the customer or the owner of the controlling interest is (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; it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such an entity. .
- 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.

10. Monitoring of transactions

Special monitoring shall be in place for the following:

- Large and complex transactions with unusual patterns, which have no apparent economic rationale or legitimate purpose.
- Transactions which exceed the thresholds prescribed for specific categories of accounts.
- Transactions in lines to the RBI guideline for the reporting purpose to RBI, FIU-IND etc.
- Transactions involving large amounts of cash inconsistent with the normal and expected activity of the customer.
- In case unusual operations in any accounts, the matter shall be immediately reported to Reserve Bank and other appropriate authorities such as FIU-IND.

11. Maintenance of records

Arohan shall maintain proper record of transactions prescribed under Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005 (PML Rules, 2005), as mentioned below:

- All cash transactions of the value of more than Rupees Ten Lakh or its equivalent in foreign currency;
- All Series of all cash transactions individually valued below Rupees Ten Lakh, or its equivalent in foreign currency which are that have taken place within a month and the monthly aggregate which exceeds rupees ten lakhs or its equivalent in foreign currency. For determining 'integrally connected transactions' 'all accounts of the same customer' shall be taken into account.

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- All transactions involving receipts by non-profit organisations of value more than rupees ten lakh or its equivalent in foreign currency [Ref: Government of India Notification dated November 12, 2009- Rule 3, sub-rule (1) clause (BA) of PML Rules]
- Arohan to ensure that in case of customers who are non-profit organisations, the details of such customers are registered on the DARPAN Portal of NITI Aayog. If such customers are not registered, Arohan shall register the details on the DARPAN Portal. Arohan shall also maintain such registration records for a period of five years after the business relationship between the customer and the Arohan has ended or the account has been closed, whichever is later.
- 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 or a document has taken place facilitating the transaction and
- All suspicious transactions, whether or not in cash, made as mentioned in the Rules.

Arohan shall maintain all necessary information in respect of transactions prescribed under PML Rule 3, so as to permit reconstruction of individual transaction, including the following information:

- the nature of the transactions;
- the amount of the transaction and the currency in which it was denominated;
- the date on which the transaction was conducted; and
- the parties to the transaction.
- Explanation. – For the purpose of this Section, the expressions "records pertaining to the identification", "identification records", etc., shall include updated records of the identification data, account files, business correspondence and results of any analysis undertaken.

12. Preservation of Records

- In lines with the PML Amendment Act 2012, Arohan shall maintain transaction records for at least 8 years, from the date of transaction between Arohan and the client. All necessary records of transactions, both domestic or international, which will permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity.
- Arohan shall ensure that records pertaining to the identification of the customers and their address (e.g. copies of documents like passports, identity cards, driving licenses, PAN card, utility bills, etc.) obtained while opening the loan account and during the course of business relationship, are properly preserved for at least 8 years after the business relationship is ended as required under Rule 10 of the Rules *ibid*. The identification of records and transaction data will be made available to the competent authorities upon request.

- All documents/office records/memorandums pertaining to transactions, as far as possible, will be examined and any findings at branch as well as Principal Officer level shall be properly recorded. Such records and related documents shall be made available to help auditors to scrutinize the transactions and also to Reserve Bank/other relevant authorities.

13. Combating Financing of Terrorism

- I. In terms of Section 51A of the Unlawful Activities (Prevention) (UAPA) Act, 1967 and amendments thereto, Arohan shall ensure that it does not have any account in the name of individuals/entities appearing in the lists of individuals and entities, suspected of having terrorist links, which are approved by and periodically circulated by the United Nations Security Council (UNSC). The details of the two lists as available under the below links:
 - II. The “**ISIL (Da’esh) & Al-Qaida Sanctions List**”, established and maintained pursuant to Security Council resolutions 1267/1989/2253, which includes names of individuals and entities associated with the Al-Qaida is available at <https://scsanctions.un.org/ohz5jen-al-qaida.html>
 - III. The “**Taliban Sanctions List**”, established and maintained pursuant to Security Council resolution 1988 (2011), which includes names of individuals and entities associated with the Taliban is available at <https://scsanctions.un.org/3ppp1en-taliban.htm>

Arohan shall ensure refereeing the lists as available in the Schedules to the Prevention and Suppression of Terrorism (Implementation of Security Council Resolutions) Order, 2007, as amended from time to time. The said lists, i.e., UNSC Sanctions Lists and lists as available in the Schedules to the Prevention and Suppression of Terrorism (Implementation of Security Council Resolutions) Order, 2007, as amended from time to time, shall be verified on daily basis with the help of the automated tool known as “Trackwiz” and any modifications to the lists in terms of additions, deletions or other changes shall be taken into account by the Arohan for meticulous compliance.

Details of accounts resembling any of the individuals/entities in the list shall be reported to FIU-IND apart from advising Ministry of Home Affairs as required under UAPA notification dated February 02, 2021.

In addition to the above, other UNSCRs circulated by the Reserve Bank in respect of any other jurisdictions/ entities from time to time shall also be taken note of.

In term of Section 12A of the Weapons of Mass Destruction (WMD) and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005 (WMD Act, 2005) and amendments thereto. The Reserve Bank of India (RBI) vide its Circular DOR.AML.REC.111/14.01.001/2023-24 dated April 28, 2023 and subsequent modifications thereof, have prescribed guidelines for freezing/unfreezing of accounts, financial assets, etc., of individuals / entities designated under the list as specified under Section 12A of the WMD Act, 2005.

In view of the above amendment, the Company will comply the below clauses:

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- a) Arohan shall ensure not to carry out transactions in case the particulars of the individual / entity match with the particulars in the designated list.
- b) Arohan shall run a check, on the given parameters, at the time of establishing a relation with a customer and on a periodic basis to verify whether individuals and entities in the designated list are holding any funds, financial asset, etc., in the form of bank account, etc.
- c) In case of match in the above cases, Arohan shall immediately inform the transaction details with full particulars of the funds, financial assets or economic resources involved to the Central Nodal Officer (CNO), designated as the authority to exercise powers under Section 12A of the WMD Act, 2005. A copy of the communication shall be sent to State Nodal Officer, where the account / transaction is held and to the RBI. Arohan shall file an STR with FIU-IND covering all transactions in the accounts, covered above, carried through or attempted.
- d) Arohan may refer to the designated list, as amended from time to time, available on the portal of FIU-India.
- e) In case there are reasons to believe beyond doubt, that funds or assets held by a customer would fall under the purview of clause (a) or (b) of sub-section (2) of Section 12A of the WMD Act, 2005, Arohan shall prevent such individual/entity from conducting financial transactions, under intimation to the CNO by email, FAX and by post, without delay.
- f) In case an order to freeze assets under Section 12A is received by the Arohan from the CNO, Arohan shall, without delay, take necessary action to comply with the Order.
- g) The process of unfreezing of funds, etc., shall be carried out as per paragraph 7 of the Order. Accordingly, copy of application received from an individual/entity regarding unfreezing shall be forwarded by Arohan along with full details of the asset frozen, as given by the applicant, to the CNO by email, FAX and by post, within two working days.

As mandated, Arohan shall ensure verification every day w.r.t., the 'UNSCR 1718 Sanctions List of Designated Individuals and Entities', as available at <https://www.mea.gov.in/Implementation-of-UNSC-Sanctions-DPRK.htm>, to take into account any modifications to the list by way of additions, deletions or other changes and also ensure compliance with the 'Implementation of Security Council Resolution on Democratic People's Republic of Korea Order, 2017', as amended from time to time by the Central Government.

14. Reporting to Financial Intelligence Unit - India

In accordance to the PMLA rules, Arohan shall report following information relating to cash and suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND):

Cash Transaction Report

- Cash transaction report (CTR) for each month shall be submitted to FIU-IND by 15th of the succeeding month. As per the Rule 3(1)(c) of PMLA Rules,

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- Arohan will report 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 or a document has taken place facilitating the transactions
- While filing CTR, details of individual transactions below Rupees Fifty thousand need not be furnished
- All other instructions as mentioned in the guideline will be adhered to.

Suspicious Transaction Report

- Suspicious Transaction Report (STR) shall be furnished within 7 days of arriving at a conclusion that any transaction, whether cash or non-cash, or a series of transactions integrally connected are of suspicious nature.
- The Principal Officer will record his/her reasons for treating any transaction or a series of transactions as suspicious.
- It shall be the responsibility of the Branch Heads and the concerned Area Manager to update the same to the Principal Officer.
- In lines to the indicative list of suspicious activities 'IBA's Guidance Note for Banks, January 2012', KYC/AML awareness shall be build amongst concerned staff and alerts on suspicious transactions to be enabled.
- All other instructions as mentioned in the guideline will be adhered to.

Non –Profit organization

The report of all transactions involving receipts by non- profit organizations of value more than rupees ten lakh or its equivalent in foreign currency shall be submitted every month to the Director, FIU-IND by 15th of the succeeding month in the prescribed format.

Apart from the above report submissions, information collected from the Customer shall be treated as confidential and such information will not be divulged or used for cross selling or any other like purposes. Arohan shall ensure that information sought from the Customer is relevant to the perceived risk, is not intrusive and is in conformity with the guidelines issued by regulators from time to time.

15. Internal Control System

All the employees of Arohan shall conduct themselves in accordance with the highest ethical standards and conduct business in accordance with this policy and other relevant policies framed on the basis of this policy.

The following shall be ensured for effectively implementing the AML/CFT requirements:

- Using a risk-based approach to address management and mitigation of various AML/CFT risks.

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- Allocation of responsibility for effective implementation of policies and procedures.
- Independent evaluation by the compliance functions of policies and procedures, including legal and regulatory requirements.
- Concurrent/internal audit to verify the compliance with KYC/AML policies and procedures.
- Putting up consolidated note on such audits and compliance to the Audit Committee at quarterly intervals.

Failure to adhere to this policy may attract disciplinary action, including termination of employment against the concerned employee. The employees who suspect unethical behaviour shall refer the matter to appropriate personnel (Principle Officer) as directed by their businesses' policies and procedures.

16. Principal Officer and Designated Director

The “**Designated Director**” shall be designated by Arohan and shall be responsible to ensure overall compliance with the obligations imposed under chapter IV of the PML Act and the Rules and shall be nominated by Board.

In Arohan, **Managing Director** shall be the **Designated Director** for the purpose.

The “**Principal Officer**” shall be designated by Arohan and shall be responsible for ensuring compliance, monitoring transactions and sharing and reporting information as required under the law/regulations.

In Arohan, the **designated Principle Officer** shall be the Company Secretary and Chief Compliance Officer.

The Principal Officer shall ensure that adequate measures are taken to update the provisions of other relevant policies framed in lines to the guidelines mentioned in this policy. The Principal officer shall be custodian of this policy. His/her other responsibility includes share periodical reports related to AML with the Executive Committee of the Management and /or Board, submission of unusual and suspicious activity, if noticed, to the regulatory/law enforcement authorities and also building adequate awareness among the organization about the requirement of the provision, stated in this policy.

17. Simplified procedure for opening accounts by Non-Banking Finance Companies (NBFCs):

In case a person who desires to open an account is not able to produce any of the OVDs, NBFCs may at their discretion open accounts subject to the following conditions:

- a. The NBFC shall obtain a self-attested photograph from the customer.
- b. The designated officer of the NBFC certifies under his signature that the person opening the account has affixed his signature or thumb impression in his presence.

- c. The account shall remain operational initially for a period of twelve months, within which CDD as per Section 16 shall be carried out.
- d. Balances in all their accounts taken together shall not exceed rupees fifty thousand at any point of time.
- e. The total credit in all the accounts taken together shall not exceed rupees one lakh in a year.
- f. The customer shall be made aware that no further transactions will be permitted until the full KYC procedure is completed in case Directions (d) and (e) above are breached by him.
- g. The customer shall be notified when the balance reaches rupees forty thousand or the total credit in a year reaches rupees eighty thousand that appropriate documents for conducting the KYC must be submitted otherwise the operations in the account shall be stopped when the total balance in all the accounts taken together exceeds the limits prescribed in direction (d) and (e) above.
- h. The account shall be monitored and when there is suspicion of ML/TF activities or other high-risk scenarios, the identity of the customer shall be established as per Section 16 or Section 18.

18. CDD Procedure and sharing KYC information with Central KYC Records Registry (CKYCR)

(a) Government of India has authorised the Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI), to act as, and to perform the functions of the CKYCR vide Gazette Notification No. S.O. 3183(E) dated November 26, 2015.

(b) In terms of provision of Rule 9(1A) of PML Rules, the REs shall capture customer's KYC records and upload onto CKYCR within 10 days of commencement of an account-based relationship with the customer as per the Operational Guidelines for uploading the KYC data issued CERSAI.

(d) REs shall capture the KYC information for sharing with the CKYCR in the manner mentioned in the Rules, as per the KYC templates prepared for 'Individuals' and 'Legal Entities' (LEs), as the case may be. The templates may be revised from time to time, as may be required and released by CERSAI.

(f) REs shall upload KYC records pertaining to accounts of LEs opened on or after April 1, 2021, with CKYCR in terms of the provisions of the Rules *ibid*. The KYC records have to be uploaded as per the LE Template released by CERSAI.

(g) Once KYC Identifier is generated by CKYCR, REs shall ensure that the same is communicated to the individual/LE as the case may be.

(h) In order to ensure that all KYC records are incrementally uploaded on to CKYCR, REs shall upload/update the KYC data pertaining to accounts of individual customers and LEs opened prior to the above mentioned dates as per (e) and (f) respectively at the time of periodic updation as specified in Section 38 of this Master Direction, or earlier, when the updated KYC information is obtained/received from the customer.

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(i) REs shall ensure that during periodic updation, the customers are migrated to the current CDD standard.

(j) Where a customer, for the purposes of establishing an account based relationship, submits a KYC Identifier to a RE, with an explicit consent to download records from CKYCR, then such RE 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.

19. CST and STR Process through software

A. Screening Process & Customer Monitoring:

A fast and seamless customer onboarding process is essential for Arohan in terms of customer experience. However, as an organization, we must protect ourselves from risks and meet the AML obligations in customer onboarding processes. For this reason, we perform customer risk screening in order to determine the risks of our customers during the customer account opening processes.

The purpose of customer screening and customer monitoring is to identify customer risks by making a risk assessment. The procedures implemented for this purpose are generally called "Know Your Customer" and "Customer Due Diligence" procedures. Know Your Customer (KYC) procedures are how customer information is collected, and customer information accuracy is checked. After the accuracy of the customer information is confirmed, customer due diligence check procedures is implemented. Some of the controls Arohan has implemented for risk assessment in customer screening and monitoring processes are sanctions, PEP, and adverse media screening. Our AML software, **Trackwizz**, makes customer risk screening and monitoring businesses faster and easier. Its database contains sanction, PEP, and adverse media data from various sources which helps Arohan to perform a global comprehensive risk control.

Where the Company is suspicious of 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.

B. Transaction Monitoring:

Transaction monitoring refers to the monitoring of customer transactions, including assessing historical/current customer information and interactions to provide a complete picture of customer activity. The Trackwizz software will typically use information from know your customer (KYC)

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processes to account for the customer risk. The risk measures are then used as part of rules/scenarios to identify certain account-based activities for investigation and possible disclosure.

The tailor made rules/ scenarios we have mapped in our system to trigger alerts includes:

1. **Rule 1 for EMI Receipts:** Maximum EMI acceptance without alerts should be OD EMI (if any) Plus Amount Equal to 2 EMIs (i.e. OD EMI + 2 EMIs).
2. **Rule 2 for Receipt of Loan Pre-Closure Amount:** Total Loan Pre-Closure Amount Plus 10% of the Pre-Closure Amount.
3. **Rule 3 for CTR & STR System Alerts:** Cash received in Excess of INR 10 lacs in any Customer Account (Relationship) in a month will Generate a System Alert immediately to the Compliance & CFO's team.

C. Filing of Suspicious Transaction Reporting (STR) and Cash Transaction Reporting (CTR):

In terms of the PMLA rules, NBFCs are required to report information relating to cash and suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND). The cash transaction report (CTR) for each month should be submitted to FIU-IND by 15th of the succeeding month. The Suspicious Transaction Report (STR) should be furnished within 7 days of arriving at a conclusion that any transaction, whether cash or non-cash, or a series of transactions integrally connected are of suspicious nature. We may file our STRs or CTRs through Trackwizz to FIU-IND.

20. Other Requirements

Arohan 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. Accordingly, Arohan shall undertake 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.

21. Conclusion

This policy is framed to take adequate measures for Anti Money Laundering activities. This policy specifies the preventive measures, required to identify unusual and suspicious activity before providing or taking financial assistance to/from the customers/other parties. It also specifies about the requirement of adequate internal control system for ensuring the adherence of the preventive measures, required for AML activities.

In addition of that this policy also summarized the role of AML Compliance Officer in relation to the measures as well as reporting requirement as per different regulatory bodies.

Annexure 1: Officially Valid Documents for other business segments of Arohan

Accounts of individuals	(a) Passport
	(b) PAN card
	(c) Voter's Identity Card
	(d) Driving License
	(e) Job Card issued by NREGA duly signed by an officer of the State Govt
	(f) Aadhaar Card or the letter issued by the Unique Identification Authority (UIDAI) containing details of name, address and Aadhaar number of India
Accounts of 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; and
	(d) officially valid document 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; and
	(f) the registered office and the principal place of its business, if it is different.
Accounts of Partnership firms	(a) registration certificate;
	(b) partnership deed; and
	(c) officially valid document in respect of the person holding an attorney to transact on its behalf.
	(d) the names of all the partners; and
	(e) address of the registered office, and the principal place of its business, if it is different.
Accounts of Trusts	(a) registration certificate;
	(b) trust deed; and
	(c) officially valid document in respect of the person holding a power of attorney to transact on its behalf
	(d) the names of the beneficiaries, trustees, settlor and authors of the trust
	(e) the address of the registered office of the trust; and
	(f) list of trustees and documents, as specified in Section 16, for those discharging role as trustee and authorised to transact on behalf of the trust.
Accounts of unincorporated association or a body of individuals	(a) resolution of the managing body of such association or body of individuals;
	(b) power of attorney granted to him to transact on its behalf;
	(c) an officially valid document in respect of the person holding an attorney to transact on its behalf; and
	(d) such information as may be required by the bank to collectively establish the legal existence of such an association or body of individuals.
Accounts of Proprietorship Concerns	Apart from Customer identification procedure as applicable to the proprietor any two of the following documents in the name of the proprietary concern would suffice
	(i) Registration certificate (in the case of a registered concern) (including Udyam Registration Certificate issued by the Governments)
	(ii) Certificate/licence issued by the Municipal authorities under Shop & Establishment Act,
	(iii) Sales and income tax returns
	(iv) CST/VAT certificate
	(v) Certificate/registration document issued by Sales Tax/Service Tax/Professional Tax authorities
	(vi) Licence/certificate of practice issued in the name of the proprietary concern by any professional body incorporated under a statute. The complete Income Tax return (not just the acknowledgement) in the name of the sole proprietor where the firm's income is reflected, duly authenticated/ acknowledged by the Income Tax Authorities.
	In cases where Arohan where it is not possible to furnish two such documents, Arohan shall accept only one documents as activity proof. In such cases, Arohan, however, would undertake verification & collect information to establish the existence of such firm, confirm, clarify and satisfy that the business activity has been verified from the address of the proprietary concern.

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