

SIL INVESTMENTS LIMITED

“Know Your Customer” (KYC) Policy

(I) Preamble:

Reserve Bank of India (RBI) on February 25, 2016 has notified the Know Your Customer (KYC) Directions, 2016 (**KYC Directions, 2016**), inter alia, directing that every Regulated Entity shall have a KYC Policy duly approved by the Board of Directors. The RBI Master Direction - KYC, 2016 has since been amended from time to time, requiring adoption of a risk-based Anti-Money Laundering (AML), Combating Financing of Terrorism (CFT) and Proliferation Financing (PF) KYC framework under the Prevention of Money Laundering Act, 2002 (PMLA).

Accordingly, this KYC Policy has been adopted by the Board, superseding the existing KYC policy/norms adopted by the Company.

(II) Objectives:

To have a clearly laid out:

1. Customer Acceptance policy;
2. Risk Management policy;
3. Customer Identification process; and
4. Monitoring of transactions.

This Policy also aims to ensure compliance with AML, CFT and PF obligations, including reporting to the Financial Intelligence Unit- India (FIU-IND).

with a view to:

- (i) put in place an effective system and procedure for customer identification and verifying its / his / her identity and residential address and conduct Customer Due Diligence (**CDD**) based on the risk factors associated with each customer;
- (ii) have in place a system of assessing and monitoring the risk factors associated with each customer;
- (iii) put in place a system of checks and balances to ensure formulation and effective implementation of procedures to help control and mitigate the risk of occurrence of financial frauds, swiftly identify probable transactions of money laundering and related suspicious activities and safeguarding SIL Investments Limited (SIL/the Company) from being unwittingly used as a conduit for transfer or deposit of funds derived from criminal activity or for financing of terrorism, irrespective of whether such money can be traced to a specific act of terrorism or not;
- (iv) monitor transactions of a suspicious nature and report the same to the Financial Intelligence Unit- India FIU - IND; verification and maintenance of records of transactions of customers in accordance with PMLA and the Rules made thereunder.

(III) Definitions:

For the purpose of this Policy:

“Customer” means a person who is engaged in a financial transaction or activity with a Regulated Entity (RE) and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting.

Other terms not specifically defined here shall have the same meaning as assigned to them under the KYC Directions, 2016 or the PMLA.

(IV) Customer Acceptance Policy (CAP), Risk Management, Customer Identification Procedure (CIP), Monitoring of Transactions:

1. Customer Acceptance Policy

Customers who are acceptable to SIL as per the Risk categorization should fulfill all criteria related to submission of Officially Valid Documents (OVD) as defined by RBI from time to time and more specifically stated under the Customer Identification Procedure in the table set out separately.

‘Optional’/additional information, shall be obtained with the explicit consent of the customer.

2. Risk Management

Risk categorization of customers shall be undertaken on the basis of various factors, such as nature of business activity of the customer, location of customer and his/its clients, mode of payments, volume of turnover, social/financial status and credit history. Risk categorization shall also be undertaken on the basis of Risk-Based Approach (RBA) as mandated under KYC Directions, including identification of High-Risk customers such as Politically Exposed Persons (PEPs) and customers from Financial Action Task Force (FATF) high-risk jurisdictions. SIL may at its discretion identify additional factors that it may wish to utilize for customer acceptance based on risk profile determined by SIL.

SIL may categorize its customers into 'High Risk / Medium Risk / Low Risk' according to risk perceived based on its experience and review it from time to time. SIL may devise procedures for creating risk profiles of its existing and new customers and apply various Anti-Money Laundering measures keeping in view the risks involved in a financial transaction or a business relationship. SIL's internal audit and compliance functions shall play an important role in evaluating and ensuring adherence to KYC policies and procedure, including legal and regulatory requirement. The compliance in this regard is being and will continue to be put up before the Audit Committee on a periodical basis.

3. Customer Identification Procedure

SIL shall ensure that customer identification process is undertaken, whenever dealing with a new entity/company or while carrying out occasional transaction of an amount equal to or exceeding Rs. 50,000/-, whether conducted as a single transaction or several transactions that appear to be connected or any international money transfer operations.

While undertaking customer identification, SIL shall ensure that the decision-making functions of determining compliance with KYC shall not be outsourced.

SIL shall be adequately satisfied with the information furnished by each new customer with respect to identity of the customer and the purpose of the intended nature of relationship with SIL. The satisfaction of SIL with respect to the information/documents furnished by the customers should be such that if circumstances necessitate, SIL shall ensure that it is in a position to satisfy the competent authorities that CDD was duly observed by SIL, based on the risk profile/categorization of the customer.

SIL shall ensure that its customer is not a fictitious person by verifying the identity of the customer through documentation and shall also carry out necessary checks, so as to confirm that the identity of the customer on the basis of the documents obtained does not match with any banned entities.

One or more of the following valid self-attested documents may be called for from the customers as OVD, containing details of proof of their identity and address:

Type of Customer	Officially Valid Documents
In case of Individuals	Identity proof: (Copy of one of the following)
	<input type="checkbox"/> Passport
	<input type="checkbox"/> Driving Licence
	<input type="checkbox"/> Income Tax PAN Card
	<input type="checkbox"/> Voter's Identity Card
	<input type="checkbox"/> Aadhar Card
	Residence proof: (Copy of one of the following)
	<input type="checkbox"/> Utility Bill (Latest Telephone / Post-paid mobile / Electricity bill)
	<input type="checkbox"/> Property or Municipal Tax receipt
	<input type="checkbox"/> Bank Account or post office savings bank account statement
	<input type="checkbox"/> Passport
	<input type="checkbox"/> Driving Licence
	<input type="checkbox"/> Voter's Identity Card
	<input type="checkbox"/> Aadhar Card
	A copy of the marriage certificate or Gazette notification, in case of change in name

In case of Non-Individual (As applicable)	Identity & Residence proof (Copies of the following)	
	<input type="checkbox"/>	Income Tax PAN Card
	<input type="checkbox"/>	Incorporation Certificate & Memorandum & Articles of Association (Registration Certificate & Deed, in case of Partnership firm/Trust)
	<input type="checkbox"/>	CST/VAT/Service Tax/GST registration / Shops & Establishment Certificate, as applicable
	<input type="checkbox"/>	List of Directors/Partners/Trustees along with their OVDs as above
	<input type="checkbox"/>	Latest shareholding pattern, along with the list of major shareholders having more than 25% of holding, in case of company
<input type="checkbox"/>	Utility bill	

- The e-KYC service of Unique Identification Authority of India (UIDAI) shall be accepted as a valid process for KYC verification under the PML Rules.
- In addition to verification through one or more of the above said documents, SIL may also call for suitable introduction by a person known to the company/group companies, if required.
- CDD shall include identification and verification of customers and beneficial owners using Officially Valid Documents (OVDs), Aadhaar e-KYC / Offline Aadhaar verification and Video-based Customer Identification Process (V-CIP), where permitted.

Identification of Beneficial Owner

While dealing with a Legal Person who is not a natural person, the beneficial owner(s) shall be identified at the threshold prescribed by RBI and all reasonable steps 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 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 to be 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.

4. Monitoring of Transactions:

- i. SIL normally does not and would not have large cash transactions. However, if and when cash transactions of Rs.10 lakhs and above are undertaken, SIL will keep proper record of all such cash transactions in a separate register maintained at its office.
- ii. SIL shall monitor transactions on an ongoing basis and report Suspicious Transaction Reports (STRs), Cash Transaction Reports (CTRs) and other prescribed reports to FIU-IND in accordance with PMLA and RBI Directions.
- iii. SIL shall exercise caution with respect to the transactions with persons (including legal persons and other financial institutions) from the countries which have been identified by FATF as high risk and non-cooperative jurisdictions with respect to compliance with the FATF Recommendations, 2012.

On-going Due Diligence

SIL shall undertake on-going due diligence of customers to ensure that their transactions are consistent with their knowledge about the customers, customers' business and risk profile; and the source of funds. The extent of monitoring shall be aligned with the risk category of the customer.

Periodic Updation

Periodic updation shall be carried out at least once every two years, for High Risk customers, once every eight years, for Medium Risk customers and once every ten years, for Low Risk customers or earlier as required.

Enhanced Due Diligence

I) Information obtained from Customers

All the information collected from the customers by SIL shall be kept confidential and all such information shall be treated as per the agreement/terms and conditions signed by the customers. Additionally, the information sought from each customer should be relevant to the risk perceived in respect of that particular customer, should not be intrusive and should be in line with the guidelines issued by the RBI in that behalf.

II) Record Management

SIL shall take steps in the direction of maintenance and preservation of the records pertaining to KYC and transactions for the time duration of 5 years or such longer period as prescribed under law for KYC-related and transaction-related documents as prescribed by RBI.

III) Other Requirements

All other requirements under FATCA/CRS/PML/FIU-Ind relating to appointment of designated officer/director, principal officer and reporting requirements relating to filling of Suspicious Transaction Report (STR), Cash Transaction Report (CTR), counterfeit currency report (CCR) and other applicable reports filing under FATCA will be complied with in terms of the direction of RBI or the other authorities to the extent applicable to SIL.
