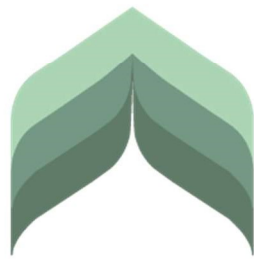


Dovetail Financial Service Private Limited
Know Your Customer Policy



Dovetail

'KNOW YOUR CUSTOMER' (KYC) POLICY AS PER ANTI MONEY LAUNDERING STANDARDS

Dovetail Financial Service Private Limited (hereinafter referred to as “**DFSPL**”/“**the Company**”), in compliance with RBI circular no. RBI/DBR/2015-16/18 DBR.AML.BC.NO.81/14.01.001/2015-16 dated December 08, 2016 in lieu of the repealed circular of RBI-2004-05/371 - DNBS(PD). CC 48 /10.42/2004- 05, dated February 21, 2005 and the various circulars issued from time to time, is adopting the following KYC policies:

The Company shall follow customer identification procedure for opening of accounts and monitoring transactions of a suspicious nature for the purpose of reporting it to appropriate authority. The policy is based on Anti Money Laundering (AML) standards.

1. Information collected from the customer for the purpose of opening of account shall be kept confidential and the company shall not divulge any details thereof for cross selling or any other purposes. Information sought from the customer shall be relevant to the perceived risk, shall not be intrusive, and shall be in conformity with the guidelines issued by RBI from time to time. Any other information from the customer shall be sought separately with his /her consent and after opening the account.
2. The objective of the KYC policy is to prevent the company from being used, intentionally or unintentionally, by criminal elements for money laundering activities. KYC procedures also enable the company to know/understand its customers and their financial dealings better, which in turn help the company to manage its risks prudently. The company has framed its KYC policy incorporating the following four key elements:
 - i. Customer Acceptance Policy
 - ii. Customer Identification Procedure
 - iii. Monitoring of Transactions / On-going due diligence; and
 - iv. Risk Management
3. For the purpose of the KYC policy,
 - i. a ‘Customer’ may be defined as: a person who is engaged in financial transaction or activity with NBFC(s) and includes a person on whose behalf the person who is engaged in the transaction or activity is acting.
 - ii. Customer Due Diligence (CDD) means identifying and verifying the customer and the beneficial owner using ‘Officially Valid Documents’ as a ‘proof of identity’ and ‘proof of address’.
 - iii. “Designated Director” means a person designated by the NBFC to ensure overall compliance with the obligations imposed under chapter IV of the PML Act and the Rules and shall include Managing Director or a whole time director, duly authorised by the Board of Directors of the Company.
 - iv. “Officially valid document (OVD)” means the passport, the driving licence, the Permanent Account Number (PAN) Card, the Voter’s Identity Card issued by the Election Commission of India, job card issued by NREGA duly signed by an office of the State Government, letter issued by the Unique Identification Authority of India containing details of name, address and Aadhaar number. Customers, at their option, shall submit one of the six OVDs for proof of identity and proof of address.

In addition to the same Customer may submit Utility Bills, Registered Rent Agreement, Certified copy of Bank Address, Banker Confirmation Letter stating the address of the Customer. Further, Customer may submit such other document as may be approved by the Finance Committee of the Board from time to time with respect to proof of identity and proof of address.

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

4. Customer Acceptance Policy (CAP):

The criteria for acceptance of customers are as follows:

- (i) No account shall be opened in anonymous or fictitious/ benami name(s);
- (ii) No transaction or account-based relationship will be undertaken without following the Customer Due Diligence (CDD) procedure.
 - a. The mandatory information to be sought for KYC purpose while opening an account and during the periodic updates as specified, should be obtained.
 - b. ‘Optional’/additional information is obtained with the explicit consent of the customer after the account is opened.
 - c. CDD Procedure is followed for all the Joint account holders while opening a Joint Account.
- (iii) Circumstances, in which a customer is permitted to act on behalf of another person/entity, should be clearly spelt out in conformity with the established law as there could be occasions when an account is operated by a mandate holder or where an account may be opened by an intermediary in the fiduciary capacity;
- (iv) Parameters of risk assessment in terms of the customers’ identity, social/ financial status, nature of business activity, information about the clients’ business and their locations, etc. have been defined to enable categorization of customers into low, medium and high risk. While considering customer’s identity, the ability to confirm identity documents through online or other services offered by issuing authorities or other entities may also be factored in Documentation requirements and other information to be collected in respect of different categories of customers depending on perceived risk and keeping in mind the requirements of PML Act, 2002 and guidelines issued by Reserve Bank from time to time;
- (v) The company shall not open an account where it is unable to apply appropriate customer due diligence measures i.e. the company is unable to verify the identity and /or obtain documents required as per the risk categorisation due to non-cooperation of the customer or non-reliability of the data/information furnished to the company. It may, however, be necessary to have suitable built in safeguards to avoid harassment of the customer. For example, decision to close an account may be taken at a reasonably high level after giving due notice to the customer explaining the reasons for such a decision;

- (vi) Necessary checks before opening a new account will be performed 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 or whose name appears in the sanction lists circulated by RBI, etc. These are done using the World check and Watch out databases or such other information sources/tools. The company shall prepare a profile for each new customer based on risk categorization, as provided subsequently in this policy. The customer profile will be a confidential document and details contained therein shall not be divulged for cross selling or any other purposes.
- (vii) For the purpose of risk categorisation, individuals (other than High Net Worth individuals) and entities whose identities and sources of wealth can be easily identified and transactions in whose accounts by and large conform to the known profile, may be categorised as low risk. Illustrative examples of low risk customers could be salaried employees whose salary structures are well defined, people belonging to lower economic strata of the society whose accounts show small balances and low turnover, Government departments & Government owned companies, regulators and statutory bodies etc. In such cases, only the basic requirements of verifying the identity and location of the customer are to be met.

Customers that are likely to pose a higher than average risk to the company shall be categorized as medium or high risk depending on customer's background, nature and location of activity, country of origin, sources of funds and client profile etc. The company shall apply enhanced due diligence measures based on the risk assessment, thereby requiring intensive 'due diligence' for higher risk customers, especially those for whom the sources of funds are not clear.

Examples of customers requiring enhanced due diligence shall include (a), (b) high net worth individuals, (c) trusts, charities, NGOs and organizations receiving donations, (d) companies having close family shareholding or beneficial ownership, (e) firms with 'sleeping partners', (f) Politically Exposed Persons, (g) non-face to face customers, and (h) those with dubious reputation as per public information available, etc.

While criteria for defining high net worth is not defined in the existing RBI Circulars applicable to NBFCs, this is being internally defined as net worth of more than INR 25 Crore.

The adoption of customer acceptance policy and its implementation should not become too restrictive and must not result in denial of financial facility to members of the general public, especially those, who are financially or socially disadvantaged.

5. Customer Identification Procedure (CIP):

- i. Customer Identification Procedure to be carried out at different stages as under:
- Commencement of an account-based relationship with the customer;
 - When the company has a doubt about the authenticity or adequacy of the customer identification data obtained by the Company. Customer identification means identifying the customer and verifying his/ her/ its identity by using reliable, independent source documents, data or information; and
 - Carrying out a financial transaction.

- ii. The Company shall obtain sufficient information necessary to establish, to its satisfaction, the identity of each new customer, whether regular or occasional, and the purpose of the intended nature of business relationship. Being satisfied means that the company should be able to satisfy the competent authorities that due diligence was observed based on the risk profile of the customer, in compliance with the extant guidelines in place. Besides risk perception, the nature of information/documents required would also depend on the type of customer (individual, corporate, etc.). For customers that are natural persons, the company shall obtain sufficient identification data to verify the identity of the customer, his/ her address/location, and also his/ her recent photograph. For customers that are legal persons or entities, the company shall (i) verify the legal status of the legal person/ entity through proper and relevant documents (ii) verify that any person purporting to act on behalf of the legal person/entity is so authorized and identify and verify the identity of that person, (iii) understand the ownership and control structure of the customer and determine who are the natural persons who ultimately control the legal person.

Customer identification requirements in respect of a few typical cases, especially, legal persons requiring an extra element of caution, are given in Annexure - I. If the company accepts such accounts in terms of the Customer Acceptance Policy, the company shall take reasonable measures to identify the beneficial owner(s) and verify his/her/their identity in a manner so that it is satisfied that it knows who the beneficial owner(s) is/are.

An indicative list of the nature and type of documents/information that shall be relied upon for customer identification is given in the KYC Documentation Policy annexed as Annexure- II.

- iii. The Company shall ensure that decision-making functions of determining compliance with KYC norms shall not be outsourced.
 - iv. Introduction shall not be sought while opening accounts.
 - v. The Company shall not ask the customer to furnish an additional OVD, if the OVD submitted by the customer for KYC contains both proof of identity and proof of address. Further, the customer shall not be required to furnish separate proof of address for permanent and current addresses, if these are different. The Company shall obtain a declaration from the customer about her/ his local address on which all correspondence will be made by the company, in the event the proof of address furnished by the customer is the address where the customer is currently residing.
6. Monitoring of Transactions/ On-going Due Diligence:
- i. The company shall pay special attention to all large and complex transactions including RTGS transactions, and those with unusual patterns, inconsistent with normal and expected activity of the customer, which have no apparent economic rationale or legitimate purpose.
 - ii. The company shall prescribe threshold limits for specific categories of accounts and pay attention to the transactions which exceed prescribed thresholds, based on income and / or net worth of the client.

- iii. Currently, no cash transactions are done by the company, since all disbursements and repayments are made through banking channels only. However, should it ever be necessary to operate cash, transactions that involve large amounts of cash inconsistent with the normal and expected activity of the customer should particularly attract the attention of the company. Very high account turnover inconsistent with the size of the balance maintained may indicate that funds are being 'washed' through the account.
- iv. High-risk accounts shall be subjected to intensify monitoring. The company shall set key indicators for such accounts, taking note of the background of the customer, such as the country of origin, sources of funds, the type of transactions involved and other risk factors. The company shall put in place a system of periodical review of risk categorization of accounts, with such periodicity being at least once in six months and the need for applying enhanced due diligence measures.
- v. The records of transactions in the accounts shall be preserved and maintained as required in terms of section 12 of the PML Act, 2002. The company shall report the transactions of suspicious nature and/ or any other type of transaction notified under section 12 of the PML Act, 2002, to the appropriate law enforcement authority.
- vi. While currently, no cash transactions are undertaken, in the unforeseen event of such transactions taking place, the company will maintain a proper record of all cash transactions (deposits and withdrawals) of Rs.10 lakh and above. The internal monitoring system shall have an inbuilt procedure for reporting of such transactions and those of suspicious nature to controlling/ head office on a fortnightly basis.

7. Risk Management

- i. Through this policy, the Board of Directors of the company is ensuring the formal documentation of its KYC programme. The Management will establish appropriate procedures to ensure its effective implementation.
- ii. The Company shall have an ongoing employee training programme so that the members of the staff are adequately trained in KYC procedures. Training requirements shall have different focuses for frontline staff, compliance staff and staff dealing with new customers. It is crucial that all those concerned fully understand the rationale behind the KYC policy and implement the same consistently.

8. Customer Education

Implementation of KYC procedures requires the company to demand certain information from customers, which may be of personal nature or which have hitherto never been called for. This can sometimes lead to a lot of questioning by the customer as to the motive and purpose of collecting such information. The company shall prepare specific literature/ pamphlets etc. so as to educate the customer of the objectives of the KYC programme. The front desk staff shall be specially trained to handle such situations while dealing with customers.

9. Introduction of New technologies

The company shall pay special attention to any money laundering threats that may arise from new or developing technologies that might favour anonymity, and take measures, if needed, to prevent its use in money laundering schemes.

10. Review of KYC for the Existing Accounts

- i. The Company shall also apply this policy to the existing customers based on materiality and risk. Moreover, transactions in existing accounts shall be continuously monitored and any unusual pattern in the operation of the account shall trigger a review of the CDD measures.
- ii. The Company shall consider applying monetary limits to such accounts based on the nature and type of the account. All the existing accounts of companies, firms, trusts, charities, religious organizations and other institutions are subjected to minimum KYC standards which would establish the identity of the natural/legal person and those of the 'beneficial owners'.
- iii. Where the Company is unable to apply appropriate KYC measures due to non-furnishing of information and /or non-cooperation by the customer, the company shall consider closing the account or terminating the business relationship after issuing due notice to the customer explaining the reasons for taking such a decision. Such decisions shall be taken at a reasonably senior level.
- iv. The Company shall carry out periodic updations at least once in every 2 years for high risk customers, once in every 8 years for medium risk customers and once in every 10 years for low risk customers, subject to the following conditions:
 - a. Fresh proofs of identity and address shall not be sought at the time of periodic updation, from low risk customers, when there is no change in status of their identities and addresses and a self-certification to that effect is obtained;
 - b. certified copy of the proof of address forwarded by 'low risk' customers through mail/ post, etc. in case of change of address shall be acceptable;
 - c. physical presence of low risk customer at the time of periodic updations shall not be insisted upon; and
 - d. time limits prescribed above would apply from the date of opening of the account/ last verification of KYC.

11. Applicability to branches and subsidiaries outside India

The policy shall also apply to the branches (if any) and majority owned subsidiaries located abroad (if any), especially, in countries which do not or insufficiently apply the FATF Recommendations, to the extent local laws permit. When local applicable laws and regulations prohibit implementation of these guidelines, the same would be brought to the notice of Reserve Bank.

12. Appointment of Principal Officer

The Company has appointed a senior management officer designated as Principal Officer. Principal Officer shall be located at the head office of the company and shall be responsible for monitoring and reporting of all transactions and sharing of information as required under the law. He will maintain close liaison with enforcement agencies, the company and

any other institution which are involved in the fight against money laundering and combating financing of terrorism.

13. The Company shall allot Unique Customer Identification Code (UCIC) to all their customers while entering into any new relationships.

14. Record Management

In order to maintain, preserve and report the customer account information, with reference to provisions of PML Act and Rules, the Company shall,

- 1) Maintain all necessary records of transactions between the company and the customer for at least 5 years from the date of transaction;
- 2) Preserve the records pertaining to the identification of the customers and their addresses obtained while opening the account and during business relationship for at least 5 years after the business relationship is ended;
- 3) Make available the identification records and transaction data to the competent authorities upon request;
- 4) Introduce a system of maintaining proper record of transactions prescribed under Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005;
- 5) Maintain all necessary information in respect of transactions prescribed under PML Rule 3 as to permit reconstruction of individual transaction, including the nature, amount and date of transaction and the parties to the transaction;
- 6) Evolve a system for proper maintenance and preservation of account information in a manner that allows easy and quick retrieval of data whenever required or requested by the competent authorities;
- 7) Maintain records of identity and address of the customers and records in respect of transactions referred to in PML Rule 3 in hard or soft format.

The Company shall upload the KYC data pertaining to all new individual accounts opened on or after April 1, 2017 with CERSAI in terms of the provisions of the Prevention of Money Laundering (Maintenance of Records) Rules, 2005.

The Company shall maintain confidentiality of information as provided in Section 45NB of RBI Act 1934.

15. Where the customer already has a Central KYC (CKYC) 14-digit acknowledgement number, his / her documents need not be obtained again. Documents relating to identification and address can simply be downloaded from the CKYC website <https://testbed.ckycindia.in/ckyc/index.html>. However, loan agreements and finance related documents will still need to be signed/ provided by the customer.

Details / documents collected by the Company also need to be uploaded into the CKYC website within 3 (three) days of the commencement of the relationship.

ANNEXURE – I
Customer Identification Requirements – Indicative Guidelines

Trust/Nominee or Fiduciary Accounts:

There exists the possibility that trust/nominee or fiduciary accounts can be used to circumvent the customer identification procedures. The company should determine whether the customer is acting on behalf of another person as trustee/nominee or any other intermediary. If so, the company shall 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. While opening an account for a trust, the company shall take reasonable precautions to verify the identity of the trustees and the settlers of trust (including any person settling assets into the trust), grantors, protectors, beneficiaries and signatories. Beneficiaries shall be identified when they are defined. In the case of a 'foundation', steps should be taken to verify the founder managers/ directors and the beneficiaries, if defined. The identification of beneficial owner(s) shall include identification of the author of the trust, the trustee, the beneficiaries with 15% 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.

Accounts of companies and firms

The company shall be vigilant against business entities being used by individuals as a 'front' for maintaining accounts with the company. The company shall examine the control structure of the entity, determine the source of funds and identify the natural persons who have a controlling interest and who comprise the management. These requirements shall 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.

Client accounts opened by professional intermediaries

- i. When the company has knowledge or reason to believe that the client account opened by a professional intermediary is on behalf of a single client, that client must be identified.
- ii. The company may hold 'pooled' accounts managed by professional intermediaries on behalf of entities like mutual funds, pension funds or other types of funds. However, the company shall not open accounts of such professional intermediaries, viz., lawyers/chartered accountants or stockbrokers, who are bound by any client confidentiality that prohibits disclosure of the client details to the company.
- iii. Where funds held by the intermediaries are not co-mingled at the company and there are 'sub-accounts', each of them attributable to a beneficial owner, all the beneficial owners must be identified. Where such funds are co-mingled, the company shall still look through to the beneficial owners.
- iv. Where the company rely on the CDD done by an intermediary, they should satisfy themselves that the intermediary is regulated and supervised and has adequate systems in place to comply with the KYC requirements of the customers.

Accounts of Politically Exposed Persons (PEPs) (includes a PEP is the beneficial owner)

- i. The Company should gather sufficient information including information about the sources of funds accounts of family members and close relatives, 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.
- ii. The Company shall verify the identity of the person and seek information about the sources of funds before accepting the PEP as a customer.
 - iii. The decision to open an account for PEP should be taken at a senior level in accordance with the Customer Acceptance policy of the Company.
 - iv. The Company shall also subject such accounts to enhanced monitoring on an ongoing basis.
 - v. The Company shall obtain the approval of senior management in the event of an existing customer or the beneficial owner of an existing account subsequently becoming a PEP, to continue the business relationship.
 - vi. The Company shall ensure the applicability of CDD measures to PEPs including enhanced monitoring on an on-going basis.

Accounts of non-face-to-face customers

- i. In the case of non-face-to-face customers, apart from applying the usual customer identification procedures, there shall be specific and adequate procedures to mitigate the higher risk involved.
- ii. Certification of all the documents presented shall be insisted upon and, if necessary, additional documents shall be called for. In such cases, the company shall also require the first payment to be affected through the customer's account with any bank which, in turn, adheres to similar KYC standards.
- iii. In the case of cross-border customers, there is the additional difficulty of matching the customer with the documentation and the company may have to rely on third party certification/introduction. In such cases, it shall be ensured that the third party is a regulated and supervised entity and has adequate KYC systems in place.

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ANNEXURE – II

KNOW YOUR CUSTOMER (KYC) DOCUMENTATION POLICY

Purpose -

The purpose of this document is to establish Know Your Customer (KYC) documentation policy for DOVETAIL FINANCIAL SERVICE PRIVATE LIMITED (“DFSPL”). All the loans originated by DFSPL would follow this KYC documentation policy.

Background

All products of DFSPL have same KYC documentation policy defined in their respective manuals. In case of any change floated by regulator, the required changes were required to be done separately in each manual.

This policy will enable us to make changes in only one document which will be followed by all products/businesses and will standardize the KYC documentation policy throughout the organization.

Documentation requirements have been laid down for each client type. The basic documents are the minimum required by law for AML / KYC for identification and address. Additional documents are those that provide details of a customer’s sources of income, beneficial ownership (in the case of entities) and bank A/Cs for transacting with the company:

Individual:

S. No.	KYC Document	Id Proof	Address Proof
1.	PAN Card	Acceptable	Not Acceptable
2.	Driving license	Acceptable	Acceptable
3.	Valid Passport	Acceptable	Acceptable
4.	Voter’s ID Card	Acceptable	Acceptable
5.	Job card issued by NREGA duly signed by an officer of the State Government	Acceptable (If carries Photograph)	Acceptable (If carries Photo & Address)
6.	The letter issued by the Unique Identification Authority of India containing details of name, address and Aadhaar number	Acceptable	Acceptable
7.	Certificate of Marriage issued by State government or Gazette notification indicating change in name together with certified copy of Officially Valid document in existing name of individual.	Acceptable	Acceptable
8.	Relative’s Official valid document *	Not Acceptable	Acceptable
9.	Utility Bill, Registered Rent Agreement, Bank Statement., Banker Confirmation Letter	Not Acceptable	Acceptable

Additional Documents (Individual):

Sr. No.	Document Name	Remarks
1	RTGS Letter/Disbursement request	To be part of the LAS booklet
2	Original Cancelled cheque	Of the bank account where the loan is to be disbursed
3	Last 2 FY Income Tax Return (ITR) copies	
4	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than 1 year old) where last FY ITR is showing as a loss or where ITR is not available	

Notes:

- *1) Relative as defined under section 2 (77) of the Companies Act, 2013 read with Rule 4 of the Companies (Specification of definitions details) Rules, 2014. A declaration from the relative that the said person is a relative and staying with him/her shall be obtained.
- 2) 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.
- 3) Documents can be downloaded from the CKYC website where the customer provides a 14 digit CKYC number.

Entities:

Sr. No.	KYC Document
Proprietorship	<p>A) Certified copy of the individual (proprietor) containing details of identity and address be obtained (as per 'Individual table' given above). These need to be attested by the Proprietor with the stamp of the business entity</p> <p>B) Any two of the following documents in the name of the proprietary concern need to be obtained as proof of business/activity</p> <ol style="list-style-type: none"> 1. Proof of the name, address and activity of the concern, like registration certificate, certificate/license issued by the Municipal authorities under Shop & Establishment Act, sales and income tax returns, CST / VAT certificate, certificate / registration document issued by Sales Tax / Service Tax / Professional Tax authorities, IEC (Importer Exporter Code) issued by the DGFT office/ License/certificate of practice issued in name of proprietary concern by any professional body incorporated under a statute. 2. Utility bills such as electricity, water, and landline telephone bills in the name of the proprietary concerns. 3. Complete Income Tax Return (Not just the acknowledgment) in the name of the sole proprietor where the firm's income is reflected, duly authenticated/ acknowledged by the Income Tax Authorities as proof of Business/activity in name of proprietary firm.

Additional Documents (Sole Proprietorship):

Sr. No.	Document Name	Remarks
1.	Cancelled cheque of the Firm	Of the bank account where the loan is to be disbursed
2.	Last 2 FY Income Tax Return (ITR) copies	

3.	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than 1 year old) where last FY ITR is showing as a loss or where ITR is not available.	
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Hindu Undivided Family (HUF):

HUF	Pan card copy of HUF and Karta attested by Karta. ✓ Latest Address proof of HUF and Karta attested by Karta.
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Additional Documents (HUF):

Sr. No.	Document Name	Remarks
1	RTGS Letter/Disbursement request	Format available in LAS booklet
2	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies or latest net-worth certificate copy duly certified by CA, if ITR Copy not available or is showing loss in the last FY.
3	Copy of cancelled cheque	Of the bank account where the loan is to be disbursed
4	Last 2 FYs ITR copies of HUF	
5	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than 1 year old) where last FY ITR is showing as a loss or where ITR is not available.	

Corporate:

Companies	Certified copy of: <ul style="list-style-type: none"> • Certificate of incorporation; • Memorandum and Articles of Association; • A resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf on company letter head as per format circulated separately. To be signed (with stamp) by Managing Director or Chairman or full time Company Secretary or at least two Directors (who are not the persons getting authorised); • Identification and Address proof of beneficial owners, i.e. natural persons who have control or who own controlling stake (25% or more of the shares or capital).
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Additional documents (Corporate):

Sr. No	Document Name	Remarks
1.	RTGS Letter/Disbursement request	Format available in LAS booklet
2.	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies or latest net-worth certificate copy duly certified by CA (not more than one year old) where ITR not available or last FY ITR is showing as a loss.
3.	Pan card copy/Latest Address of Company, Authorised Signatories/Directors	To be signed by respective authority
4.	List of Authorized Signatories, List of Directors and Shareholding Pattern (with percentage) as on date	On company letter head.
5	MOA/AOA & Certificate of Incorporation, MCA site print of Company and Signatory list	-
6.	Cancelled cheque leaf	Of the bank account where the loan is to be disbursed
7.	Last 2 FYs ITR copies	Mandatory
8.	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Networth Certificate (not more than one year old) - where ITR is not available or last FY ITR is showing a loss	
	UBO declaration form	Format available in LAS booklet. Should be complete filled up. KYC documents and ITR for past two years required for UBO.

Sr. No.	Document Name	Remarks
1	RTGS Letter/Disbursement request	Format available in LAS booklet
2	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	KYC documents of Guarantor along with last 2 FYs ITR copies or latest net-worth certificate copy duly certified by CA (not more than one year old) where ITR not available or last FY ITR is showing as a loss.
3	Last 2 FYs ITR copies	
4	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than one year old) - where ITR is not available or last FY ITR is showing a loss	
5	Cancelled cheque leaf	Of the bank account where the loan is to be disbursed
6	UBO declaration form	Format available in LAS booklet. Duly filled up. KYC documents and ITR for past two years required for UBO.

Trust /Association of Persons (AOP):

Trusts and Foundations	<p>Certified copy of:</p> <ul style="list-style-type: none"> • Registration certificate of the Trust, if it is registered; • Trust deed; and • An officially valid document in respect of the person holding a power of attorney to transact on its behalf – this could be a Board or Managing Committee resolution on the letter head as per format. This should be signed (with stamp) by Managing Trustee OR Chairman Or full time Company Secretary or at least two Trustees (other than those being authorised). • List of beneficial owners / beneficiaries, Author of the trust and Trustees on the letter head. <p>The identification of beneficial owner(s) shall include identification of beneficiaries with 15% or more interest in the trust or its income / property and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.</p> <ul style="list-style-type: none"> • Identification and address proof of the author of the trust, significant (15% or more) beneficiaries, trustees and authorized PoA holder(s) of the trust.
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Additional Documents (Partnership Firms):

Sr. No.	Checklist of documents	Remarks
1	RTGS Letter/Disbursement request	Format available in LAS booklet
2	Requirements relating to Deed of Guarantee - on a case to case basis, where Guarantee is accepted	Format available in LAS booklet. KYC documents of Guarantor along with last 2 FYs ITR copies or latest net-worth certificate copy duly certified by CA (not more than one year old) where ITR not available or last FY ITR is showing as a loss.
3	Board / Trustee Resolution authorising borrowing and persons authorised to transact	On Letter head as per format. To be signed (with stamp) by Managing Trustee Or Chairman Or full time Company Secretary or at least two Non Authorised Trustees of the BR.
4	Last 2 FYs ITR copies	
5	CA attested Balance Sheet and P&L for the last 2 FYs OR CA attested Net worth Certificate (not more than one year old) - where ITR is not available or last FY ITR is showing a loss	
6	Copy of cancelled cheque	Of the bank account where the loan is to be disbursed
7	UBO declaration form	Format available in LAS booklet. Duly filled up. KYC documents and ITR for past two years required for UBO.

For Un-incorporated Association or a Body of Individuals:

Unincorporated Association or Body of Individual (included societies)	Certified copy of: <ul style="list-style-type: none"> • Resolution of managing body; • Power of Attorney granted to transact on its behalf. • An officially valid document in respect of the person holding a power of attorney to transact on its behalf. • Such information as the company requires to collectively establish the legal existence of such association or body of individual. • Identification and Address proof of beneficial owners, i.e. natural persons who have control or who own controlling stake (15% or more of the shares or capital).
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Juridical Persons:

<p>Juridical persons (Government or its Departments, societies, universities and local bodies like village panchayats)</p>	<p>Certified copy of:</p> <ul style="list-style-type: none"> • Document showing name of person authorised to act on behalf of the entity; • Officially Valid Documents for proof of of identity and address in respect of the person holding a power of attorney to transact in its behalf; and • Such documents as may be required by the company to establish the legal existence of such an entity. • Identification and Address proof of beneficial owners, i.e. natural persons who have control or who own controlling stake (15% or more of the shares or capital).
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Documentation for addition for 3rd party pledgor/guarantor:

1. 3rd party pledgor agreement.
2. 3rd party pledgor PoA.
3. All KYC documents of the 3rd party pledgor.
4. Deed of Guarantee.
5. All KYC documents of the Guarantor.

Note:

1. For customers who have been categorized as “Low Risk” as per Risk Categorization Policy, below mentioned documents can be collected as Id/address Proof only in case customer is unable to produce above mentioned documents:

- a. Identity card with applicant's Photograph issued by Central/State Government Departments, Statutory/Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, and Public Financial Institutions.
- b. Letter issued by a Gazetted officer, with a duly attested photograph of the person. List of Gazetted officers are defined in Exhibit 1, whose letters would be accepted.
- c. Utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, Water bill);
- d. property or Municipal tax receipt;
- e. bank account or Post Office savings bank account statement;
- f. pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings, if they contain the address;
- g. Letter of allotment of accommodation from employer issued by State or Central Government departments, statutory or regulatory bodies, and public sector undertakings, scheduled commercial banks, financial institutions and listed companies. Similarly, leave and license agreements with such employers allotting official accommodation; and
- h. Documents issued by Government departments of foreign jurisdiction and letter issued by Foreign Embassy or Mission in India.

2. For customers who have been categorized as “Low Risk” and are re categorized as “Medium” or

“High” risk category than the Company shall obtain documents as proof of identity and proof of address immediately. In the event the customer fails to submit such documents than the Company shall initiate action as envisaged in Section 39 of Master Direction – Know your customer (KYC).

3. Documents and details required under section 285BA of the Income Tax Act, for the purpose of compliance with reporting obligations under Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standards (CRS) also may need to be obtained from customers. These are contained in Rules 114F-114H of the Income Tax Rules. This would be required where the customer has a relationship beyond just taking loans with DFSPL and intends to use us as a depository institution or an investment entity as defined in the Income Tax Rules.

4. Links to ISIL (Da’esh) & Al-Qaida Sanctions List’ and ‘The 1988 Sanctions Lists’ are as under:

- a. <https://www.un.org/sc/suborg/sites/www.un.org.sc.suborg/files/1267.pdf>
- b. <http://www.un.org/sc/committees/1988/list.shtml>

EXHIBIT – 1

1. Commissioned officers of the Indian Armed Forces.
2. Officers from the All-India Civil Services (IAS, IPS, IFS, etc.).
3. Engineering Services officers.
4. State Civil Service officers (executive) in the State Governments (PCS/SCS/PPS/upper subordinate officers).
5. Senior Physician (C.M.O.) in State/Central Hospital.
6. Senior Surgeons of Government health service.
7. Chief Pharmacist and beyond All Officers in Pharmacy Cadres State/Central Hospital.
8. Chief Engineers of Central Public Works Department.
9. Magistrates and above in the judicial services.

Dovetail