
Know Your Customer Policy (KYC) Policy



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Table of Content

1.	Preamble:.....	3
2.	Objectives, Scope and Application of the Policy:	3
3.	Definition of Customer or Legal Entity (LE).....	3
4.	Customer Acceptance Policy (“CAP”).....	3
5.	Customer Identification Procedures (“CIP”).....	4
6.	Compliance of KYC - Documents Required.....	5
7.	Uploading of KYC data on Central KYC Records Registry (CKYCR)	7
8.	KYC of Politically Exposed Person	7
9.	Risk Management:.....	8
10.	Periodic Updation of KYC documents.....	9
11.	Designated Director and Principal Officers:	10
12.	Monitoring and Reporting of Transactions:	10
13.	Closure of Accounts/Termination of Financing/Business Relationship:	11
14.	Customer Education & Awareness	11
15.	Employee’s Training	11
16.	Updation in KYC Policy of Company	11

List of Annexures

1. Maintenance of Records and furnishing of reports to FIU-IND
2. KYC Form A (For authorized signatory and promoter director)
3. KYC Form B (For Company)
4. Format for annual declaration by Customer
5. Format for periodic monitoring of Risk Profile of customer

Know Your Customer (KYC) Policy

1. Preamble:

Reserve Bank of India has been issuing guidelines in regard to Know Your Customer (KYC) standards to be followed by NBFC and measures to be taken in regard to Anti Money Laundering (AML)/ Combating Financing of Terrorism (CFT) and guidelines issued by Financial Action Tasks Force (FATF). This KYC policy document has been prepared in line with the RBI guidelines.

2. Objectives, Scope and Application of the Policy:

The primary objective is to prevent the Company from being used, intentionally or unintentionally, by criminal elements for money laundering activities or terrorist financing activities.

- To lay down explicit criteria for acceptance of customers
- To establish procedures to verify the beneficial owner (BO) /non individuals for opening of account.
- To develop customer acceptance and identification process through obtaining and verification of officially valid documents
- To develop risk based approach for customer categorization
- To develop measures for conducting due diligence in respect of customers and reporting of such transactions.
- In case of any scenarios not explicitly covered under PFS's policy, the provisions as mentioned under the RBI guidelines shall be assumed.

3. Definition of Customer or Legal Entity (LE)

For the purpose of PFS KYC policy a 'Customer' / "Borrower" / Legal Entity means a person / Beneficial Owner define under Master Direction - KYC as issued by RBI and any amendment from time to time by RBI which are at present as under:-

- A person or entity that maintains an account and/or has a business relationship with PFS;
- One on whose behalf the account is maintained (i.e. the natural beneficial owner)
- Beneficiaries of transactions conducted by professional intermediaries such as Stock Brokers, Chartered Accountants, Solicitors etc. as permitted under the law, and
- Any other person or entity connected with a financial transaction which can pose significant reputation or other risks to PFS,

4. Customer Acceptance Policy ("CAP")

Customer Acceptance Policy requires all customers to fill in PFS- KYC Form as attached to capture the relevant data for all categories of customers and provide supporting documents as given in the forms as a part of customer identification process / KYC. PFS shall also ensure that:

- No account is opened in anonymous or fictitious/ benami name
- The mandatory information as required for KYC purpose for customer on boarding and during the periodic updation, is specified under this policy. Additional information, where such information requirement has not been specified in the KYC Policy is obtained with the explicit consent of the customer.
- Account is opened after proper Customer Due Diligence (CDD) i.e. identifying and verifying the customer and the beneficial owner at the time of Unique Customer Identification Code (UCIC) level.

- There will be no fresh CDD exercise at the time of opening of any other account for the same customer. PFS shall apply the CDD procedure at the UCIC level. Thus, if an existing KYC compliant customer of PFS desires to open another account or avail any other product or service from PFS, there shall be no need for a fresh CDD exercise as far as identification of the customer is concerned.
- Identity of the Customer should not match with any person or entity, whose name appears in the sanctions list indicated in the RBI circular.
- Where Permanent Account Number (PAN) is obtained, the same shall be verified from the verification facility of the issuing authority or with the original document produced for verification.
- Where Goods and Services Tax (GST) details are available, the GST number shall be verified from the search/verification facility of the issuing authority or with the original document produced for verification.

In case PFS observes a suspicion 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 with FIU-IND

In case PFS is unable to apply appropriate CDD measures, either due to non-cooperation of the customer or non-reliability of the documents/ information furnished by the customer, PFS shall consider filing an Suspicious Transaction Report (STR), if necessary, when it is unable to comply with the relevant CDD measures in relation to the customer

5. Customer Identification Procedures (“CIP”)

Customer identification means identifying the customer and verifying his/her identity by using reliable, independent source documents, data or information which may include customer due diligence done by a third party or from the Central KYC Records Registry. PFS shall obtain the KYC identifier from Customer to download records from CKYCR.

PFS shall obtain sufficient information necessary to verify the identity of each new customer along with brief details of its promoters and management and the purpose of the intended nature of Business relationship. The requirement as mentioned herein may be moderated according to the risk perception.

For the purpose of establishing an account-based relationship, updation/ periodic updation or for verification of identity of a customer, PFS shall seek the KYC Identifier from the customer or retrieve the KYC Identifier, if available, from the CKYCR and proceed to obtain KYC records online by using such KYC Identifier and shall not require a customer 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; or
- (ii) the KYC record or information retrieved is incomplete or is not as per the current applicable KYC norms; or
- (iii) the validity period of downloaded documents has lapsed; or
- (iv) if PFS considers it necessary in order to verify the identity or address (including current address) of the customer, or to perform enhanced due diligence or to build an appropriate risk profile of the customer.

Due to nature of business of PFS with single location, Video based Customer Identification Process (V-CIP) has not been stipulated.

PFS shall not accept Customer Due Diligence by Third party for the purpose of KYC.

6. Compliance of KYC - Documents Required

Before execution of facility agreement, PFS shall ensure the compliance of KYC for new account of borrower/ promoter director or any person identified as authorized signatory of borrower.

PFS has prescribed forms for different types of customers as per details given below:

1. Individual (for Authorized Signatory and Promoter Director) - PFS -KYC-A
2. Non - Individual (for Borrower Company and Promoter Company) - PFS -KYC-B

As required under the Act and rules, information so collected shall be properly retained and preserved for each customer. Profile of customer may be prepared for quick reference as and when required. The information/documents so collected shall be treated as confidential and shall not be divulged for cross selling or for any other purpose.

- a) In case of **Individual (for Authorize Signatory and Promoter Director)** (To be signed by Individual/Authorized Signatory or Company secretary of the borrower)

Proof of Identity	Any one of the following: <ol style="list-style-type: none"> 1. Passport* 2. PAN Card 3. Aadhaar Card** 4. Voter's ID 5. Driving License 6. ID card issued by any central/state govt.
Proof of address	Any one of the following: <ol style="list-style-type: none"> 1. Passport * 2. Aadhaar Card** 3. Utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill); 4. Property or Municipal tax receipt 5. Pension of family pension order (PPOs) issued to retired employees by Govt departments or PSU, if they contain the address. 6. Letter/ Certificate issued by current Employer for address proof (in case of for Non Resident Indian); duly signed by Director or Authorized signatory 7. Any other documents issued by Government showing Address.

**compulsory in case of non-resident individuals and for Promoter Directors in Company.*

*** Shall be verified from the verification facility of the issuing authority or with the original document produced for verification and should be recorded by KYC officer of PFS. Also, the Borrower shall be required to redact the Aadhaar number in case Aadhaar number can be electronically verified by PFS.*

The above documents are in any other language, and then it must be translated into English along with a certificate from translator / notary public.

- b) In case of **Non Individual (for Borrower Company and Promoter Company/ Legal Entity)**

Mandatory Documents required for starting a Relationship (to be obtained before execution of loan agreement) (To be signed by Authorized Signatory or Company secretary.)

- ❖ Private and Public Limited Companies
 - Form B - Duly signed by Authorized Signatory

- Form B – Duly signed by Beneficiary Owner (such as promoter/ promoter director (s) who are beneficiary owner
 - Certificate of incorporation,
 - Memorandum & Articles of Association
 - Permanent Account Number of the company
 - Resolution of the Board of Directors/Authority letter by CMD/MD/CEO/WTB/Director for Authorized person/s mentioned in Form B.
 - Registered office and the principal place of its business, if it is different
 - Names of persons holding senior management position
 - Form A of Authorized signatory alongwith Address and ID proof
 - Form A of key Promoter Director(s) alongwith Address and ID proof
- ❖ Accounts, where third party mandate exists
- A resolution from the Board of Directors and true notarized copy (with attested signature of POA holder and Managing Director or his authorized signatory) of power of Attorney (POA) Agreement.
 - Reason for granting POA
 - True Copy (certified by Company Secretary or director) of Identity and address documents of POA holder
 - Signed Photograph of POA holder.
 - All other verification documents as applicable for Public/Private limited companies.
- ❖ Financial Institutions
- True copy (certified by Company Secretary or director) of Certificate of Institution's License.
 - True copy (certified by Company Secretary or director) of Certificate of Incorporation.
 - True copy (certified by Company Secretary or director) of Statue or equivalent, stating that the institution is a regulated entity.
 - All other verification documents as applicable for Public/Private limited companies.
- ❖ Govt Companies
- Certificate of incorporation
 - Memorandum & Articles of Association
 - Permanent Account Number of the company
 - Resolution of the Board of Directors/Authority letter by CMD/MD/CEO/WTB/Director for Authorized person/s
 - Proof of Registered office and the principal place of its business, if it is different.
 - Address and ID proof of Authorized signatory

Note :

- 1) KYC of scheduled commercial banks and FIs are registered with statutory bodies like RBI, Government Companies or any organization owned or controlled by Government is exempted.
- 2) KYC of Private Equity Fund/ trust, which are ultimate promoter of the Borrower Company, is not required.
- 3) as per section 178 of Companies Act 2013, the expression "senior management" means personnel of the company who are members of its core management team excluding Board of Directors comprising all members of management one level below the executive directors, including the functional heads

- 4) The required data from borrower shall be collected as per formats (Forms PFS KYC A/B) prescribed in this policy, irrespective whether PFS is the lead institution or there are other co-financing institutions. To ensure monitoring of PFS's KYC Guidelines, the borrowers may be requested to resubmit their KYC periodically as defined elsewhere based on Risk Category or in case there is any change in the structure of entity with new promoter which does not have any relationship with PFS within 30 days of information of such change.
- 5) Information collected from the Customer shall be treated as confidential and details thereof are not to be divulged for cross selling or any other like purposes. PFS shall therefore, 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 RBI in this regard.

7. Uploading of KYC data on Central KYC Records Registry (CKYCR)

PFS shall capture customer's KYC records and upload onto CKYCR within 7 (seven) days of commencement of an account-based relationship with the customer which shall be updated if any updated KYC information is obtained or received from the Borrower. Once KYC identifier is generated by CYCR, the same shall be communicated to the Borrower once it is uploaded.

Further, as per circular dated 21st April 2022 issued by Central KYC Record Registry, PFS need not upload KYC records of Central/State Government Ministries/Departments and Statutory Organizations and their authorized signatories to CKYCR.

Verification of KYC documents through CKYC Records

PFS may obtain the KYC identifier from Customer to download records from CKYCR or may directly download CKYCR based on the data available and in such case 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 validity period of documents downloaded from CKYCR has lapsed.

If PFS 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.

8. KYC of Politically Exposed Person

Politically Exposed Persons (PEPs) shall include all individuals and their family members or close associates as defined by RBI from time to time, 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 such as below:
 - All existing and past Members of Legislative Assemblies/Members of Parliament
 - Candidates who have contested elections in the past five years.
 - List of all members of recognized political parties.

PFS shall verify the beneficiary owner or promoter of Borrower company is PEP based on data available in public domain to the extent possible. In this regard, PFS shall obtain the declaration about PEP at the time of KYC compliance and such KYC shall be approved by MD&CEO.

In case of establishing a relationship with PEPs or in case PEP is the beneficial owner, following should be ensured:

- a. sufficient information including information about the sources of funds accounts of family members and close relatives to be taken for establishing the source of funds / wealth;
- b. the identity of the person shall have been verified before accepting the PEP as a customer;
- c. the decision to open an account for a PEP is approved by MD & CEO in accordance with the PFS' Customer Acceptance Policy as part of KYC policy;
- d. all such accounts are subjected to enhanced monitoring on an on-going basis;
- e. in the event of an existing customer or the beneficial owner of an existing account subsequently becoming a PEP, MD & CEO approval shall be obtained to continue the business relationship;

9. Risk Management:

The outcome of Risk assessment (type, identity of customer) shall be documented in the KYC Forms. The assessment process should consider all the relevant risk factors before determining the level of overall risk.

Risk categorisation shall be undertaken based on parameters such as customer's identity, social/financial status, nature of business activity, and information about the customer's business and their location, geographical risk covering customers as well as transactions, type of products/services offered, delivery channel used for delivery of products/services, types of transaction undertaken – cash, cheque/monetary instruments, wire transfers, forex transactions, etc.

The risk categorisation of a customer and the specific reasons for such categorisation shall be kept confidential and shall not be revealed to the customer to avoid tipping off the customer.

Risk factors such as customer identity, nature of customer, country of origin, sources of funds, type of transactions involved and other shall determine the extent of monitoring.

PFS customers will be categorized based on perceived risk, into three categories - A, B & C. None of the Legal entities will be exempted from PFS's KYC procedure, irrespective of the status and relationship with Company or promoter. The above requirement may be moderated according to the risk perception.

The risk category of the customers shall be categorized into three levels:

- Level A – High Risk
- Level B – Medium Risk
- Level C – Low Risk

The following customers shall be categorized as **Level C (Low Risk)** risk customer

- ✓ Relationships with Significant and well established entities.
- ✓ Relationships with regulated Financial Institutions in, or having their Head Office in, equivalent jurisdictions or countries that adopted equivalent standards (where reliance is placed on the fact that the Head Office is in an FATF or equivalent country, its policies and procedures must be binding on the country branch or subsidiary concerned).
- ✓ Relationships with Government departments (Ministerial or Non-ministerial) or their agencies, (including their statutory corporations and their private companies), except those in/from high risk countries (i.e. FATF non-compliant country)
- ✓ Relationships with registered public companies and their subsidiaries.
- ✓ Entities whose identity and source of fund can be identified and transaction in whose account by and large confirm to known profile

The following customers shall be categorized as **Level A(High Risk)** risk customer based on the limited due diligence carried out at the time of sanction and as part of legal due diligence by PFS before execution of loan agreement and based on the declaration submitted by Customer as part of KYC documents.

- ✓ Government departments or their agencies, statutory corporations and private companies in/from high risk countries (i.e. FATF non-compliant country)
- ✓ Relationships involving offshore trust structure. relationships involving bearer shares.
- ✓ Relationships, whose businesses are vulnerable to Money Laundering (ML) risks such as Gambling, defense and money service bureau and dealers in high value commodities (eg: traders in precious metals, jewelers and antique dealers).
- ✓ Name of company or its key promoter director does not appears in the Sanction list by UN Council (UNSCR 1718 Sanctions List of designated Individuals and Entities), or ISIL & Al-Qaida Sanctions list or Taliban Sanctions list maintained pursuant to Security Council resolutions,
(ref: <https://www.mea.gov.in/Implementation-of-UNSC-Sanctions-DPRK.htm>;
<https://scsanctions.un.org/ohz5jen-al-qaida.html>; <https://scsanctions.un.org/ohz5jen-al-qaida.html>)
- ✓ Name of company or its key promoter director does not appears in the designated list for obligation under Weapons for Mass destruction (VMD) and their delivery system
- ✓ Falls under sector specific vulnerabilities as informed by the regulator
- ✓ Private Trust, Charity, NGOs receiving donations, Firms with sleeping partner(s)
- ✓ Entities whose identity and source of fund cannot be identified and transaction in whose account by and large not confirm to known profile

The following customers shall be categorized as **Level B (Medium Risk)** risk customer

- ✓ All relationships not categorized as Level C and Level A

PFS shall carry out the Money Laundering and Terrorist Financing Assessment annually to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk for clients, countries or geographic area, products etc. This should be done by ensuring the name of customers does not appear in the Sanctions list of UN (UNSCR 1718 Sanctions List of designated Individuals and Entities) or ISIL & Al-Qaida Sanctions list or Taliban Sanctions list maintained pursuant to Security Council resolutions.

The risk assessment of Customers is to be reviewed annually by Principal Officer and outcome of assessment shall be submitted to ACB for information. Principal Officer may require further guidance from ACB in case the Customer classification is downgraded to High Risk so they can assess the risk involved in the case on the basis of data collected by KYC officer. Depending on the requirement, services of an independent consultant having knowledge and background on the subject may be taken. Such issues categorization shall be kept confidential and shall not be divulged to any third party including the Customer irrespective of their relationship with PFS at any level.

10. Periodic Updation of KYC documents

Periodic Updation” means steps taken to ensure that documents, data or information collected under the CDD process is kept up-to-date and relevant by undertaking reviews of existing records at periodicity prescribed by the regulator time to time.

The periodicity of updation of KYC shall be once in ten (10) years in case of low risk category customers and once in eight (8) years in case of medium risk categories and two (2) years in case of high risk categories. The same will be counted from the date of opening of the account / last KYC updation

PFS shall periodically update customer identification data after the transaction is completed and review annually for the active loan accounts except NPA accounts. The scope of review shall essentially means profile of customer, status of accounts, change in promoter/ key shareholder. PFS shall obtain the confirmation / self-declaration from Borrower via digital channels or a letter from an authorized official of the Borrower entity on yearly basis for any change in KYC. In case the validity of the CDD documents available with the PFS has

expired at the time of periodic updation of KYC, PFS shall undertake the KYC process equivalent to that applicable for on-boarding a new customer.

If there's a change in KYC information, PFS shall undertake the KYC process equivalent to onboarding as new Borrower within 30 days of such changes intimated by the Borrower.

In case of no change in the KYC information, a self-declaration in this regard shall be obtained (in the format provided by PFS as attached) from the Borrower through its email id registered with PFS, letter from an official authorized by the Borrower / board resolution, etc. Further, PFS shall ensure during this process that Beneficial Ownership (BO) information available is accurate and shall update the same, if required, to keep it as up-to-date as possible.

At the time of periodic updation, on account of any change in Risk categorization of Customer, PFS may ask Customer to furnish the additional information such as recent photographs, requirement of physical presence of Customer or any other documents at the sole discretion of PFS.

Acknowledgment is provided to the customer mentioning the date of receipt of the relevant document(s), including self-declaration from the customer, for carrying out updation/periodic updation.

Further, records pertaining to KYC shall be maintained by PFS for the period of five (5) years from the date of cessation of transactions with the Borrower.

11. Designated Director and Principal Officers:

Under PMLA, PFS is required to appoint a Principal Officer and a Designated Director. PFS is also obligated to client due diligence, maintain record of specified transactions for the prescribed period and furnish report of the prescribed transactions to FIU-IND.

Designated Director, who shall be the Managing Director (MD) or a whole-time Director, shall ensure overall compliance with the obligations imposed under chapter IV of PML Act and the Rules and shall be nominated by the Board.

Principal Officer (for KYC purposes means an officer at the management level nominated by PFS,) will act independently and report directly to the Designated Director. The role and responsibilities of the Principal Officer(s) include overseeing and ensuring overall compliance, monitoring transaction (including sharing and reporting of all necessary reports, data, communication) with regulatory guidelines on KYC/AML/CFT issued from time to time and obligations under the Prevention of Money Laundering Act, 2002 and the Prevention of Money Laundering Rules 2005, rules and regulations made there under, as amended from time to time including from Reserve Bank of India.

The name, designation, address and contact details of the Designated Director and Principal Officer shall be communicated by the Principal Officer to the FIU-IND and Reserve Bank of India (RBI) for their information and records.

In no case, the Principal Officer shall be nominated as the 'Designated Director' by the Board.

12. Monitoring and Reporting of Transactions:

Monitoring of transactions will be conducting taking into consideration the risk profile of the Customer Higher risk accounts shall be subject to intensify monitoring. PFS shall carry out the periodic review of risk categorization of transactions/customers and the need for applying enhanced due diligence measures at a periodicity of not less than once in six months. The ongoing due diligence shall mean regular monitoring of transactions in accounts to ensure that they are consistent with customer profile and source of fund and its utilisation.

Further, PFS shall verify, 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 of any modifications to the list in terms of addition, deletion, or other changes and also ensure the compliance with implementation of Security Council Resolution on Democratic People's Republic of Korea Order, 2017 as amended from time to time by the Central Government. In addition, PFS shall take into account compliance with implementation of Section 51A of the Unlawful Activities (Prevention) Act, (UAPA) 1967 and Section 12 A of the WMD Act.

PFS shall validate watch lists available in public domain, including RBI watch list and any transactions or suspicious nature will be duly reported by Principal Officer to Director, FIU-IND.

PFS shall ensure that any remittance of funds by way of demand draft, mail/telegraphic transfer or any other mode for any amount is affected by cheques and not against cash payment. Foreign remittance shall not be allowed to be credited into PFS account unless the identity of customer is fully established as per KYC Policy.

PFS is also obligated to client due diligence, maintain record of specified transactions for the prescribed period and furnish report of the prescribed transactions to FIU-IND. Maintenance of records and furnishing of reports (including STR) to FIU-IND (not exhaustive) is placed in Annexure. This does not include monitoring of TRA/ Escrow account created for Borrower/ Customer.

13. Closure of Accounts/Termination of Financing/Business Relationship:

Where PFS is unable to apply appropriate KYC measures due to non furnishing of information and/or non-operation by the customer, PFS shall terminate Financing/Business Relationship after issuing due notice to the customer explaining the reasons for taking such a decision. Such decision shall be taken with the approval of MD &CEO.

14. Customer Education & Awareness

The above policy along with relevant forms shall be hosted on PFS's website i.e. www.ptcfinancial.com to educate the customer w.r.t the objectives of the KYC / AML/ CFT programme. While dealing with customer(s), PFS shall take special care in obtaining required information from the Customer.

15. Employee's Training

PFS shall have an ongoing employee training programme so that the KYC Officer(s) are adequately trained in KYC/ AML/ CFT procedures. Training requirements shall have different focuses for frontline staff, compliance staff and officer/staff dealing with the customers. It is crucial that all those concerned fully understand the rationale behind the KYC policy and implement them.

16. Updation in KYC Policy of Company

Principal Officer shall initiate any amendment/modifications in view of the latest regulatory guidelines, feedback from stakeholder and/or as directed by the Board of Directors/ ACB which shall be reviewed and vetted by HIA at least on annual basis. The policy shall be approved by the Board of Directors on the recommendation of the ACB.

Unless otherwise specified, such amendments/ updates shall be effective from the date of the Board meeting; where such policy/amendments are approved. Further, all guideline/ policy issued by GOI/MoF, RBI or any other statutory authority with regard to KYC shall automatically become integral part of this Policy.

Maintenance of Records and furnishing of reports to FIU-IND

The following transactions have been specified under the PML Rules for which records have to be maintained and reports are to be furnished to FIU-IND :

- a) All cash transactions of the value of more than rupees 10 lakh or its equivalent in foreign currency.
- b) All series of cash transactions integrally connected to each other which have been individually valued below rupees ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds an amount of ten lakh rupees or its equivalent in foreign currency;
- c) All transactions involving receipts by non - profit organisations of value more than rupees ten lakh, or its equivalent in foreign currency;
- d) All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine or where any forgery of a valuable security or a document has taken place facilitating the transactions;
- e) All suspicious transactions, whether or not made in cash, including attempted transactions.
- f) All cross border wire transfers of the value of more than five lakh rupees or its equivalent in foreign currency where either the origin or destination of fund is in India;
- g) All purchase and sale by any person of immovable property valued at fifty lakh rupees or more that is registered by the reporting entity.

The Suspicious Transaction Report mentioned at para (e) above should be furnished within seven working days on being satisfied that the transaction is suspicious. The information in respect of immoveable property transactions referred to in (g) above should be furnished to FIU-IND every quarter by the 15th day of the month succeeding the quarter. All other reports need to be furnished on a monthly basis by the 15th day of the succeeding month.

Suspicious Transaction:

Suspicious Transaction means a transaction (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 the proceeds of crime; or
- b) appears to be made in circumstances of unusual or unjustified complexity; or
- c) appears to have no economic rationale or bona fide purpose; or
- d) gives rise to a reasonable ground of suspicion that it may involve financing of activities relating to terrorism.

Know-Your-Customer (KYC) Form A**(For Individuals- Authorized Signatory / Promoter Directors only)****Individual Information**

A. Full Legal Name ' _____

Mr./Ms./Mrs.

**AFFIX THE LATEST
PASSPORT SIZE PHOTO**

B. Full Address: _____

State :.....

Pin:.....

Tel:.....

Mobile:

Email ID:.....

C. Date of Birth

D	D	/	M	M	/	Y	Y	Y	Y
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D. PAN No.

E. Passport No. (only in case of non resident individuals)

F. KYC Identifier no (if any)

G. Educational Background

I hereby agree that PFS can download the KYC detail from CKYC portal.

Signature**Name**

Date.....

Place.....

List of Documents (Self Attested / Notary Public

Proof of Identity (copy of any one of the following):

1. Passport*
2. PAN Card
3. Aadhaar Card
4. Photo Pan Card
5. Voter's ID
6. Driving License
7. ID card issued by any central/state govt.

*compulsory in case of non-resident individuals and for Promoter Directors as indicated in Form B.

Proof of address (copy of any one of the following):

1. Passport *
2. Aadhaar Card
3. Utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill);
4. Pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings, if they contain the address;
5. Letter/ Certificate issued by current Employer for address proof (in case of for Non Resident Indian); duly signed by Director or Authorized signatory
6. Any other documents issued by Government showing Address

For Office Use only**Category of the Customer (Borrower) after assessment:**

Category of the Customer (Risk Perception):

- | | |
|-------------------------|--------|
| <input type="radio"/> A | High |
| <input type="radio"/> B | Medium |
| <input type="radio"/> C | Low |

Signatures of Principal Officer.....

Date of KYC process completed by Principal Officer

Know-Your-Customer (KYC) Form B**(Only for Non Individual Customers)***(to be fill by Customer and its Promoter (if corporate entity))***Customer Information**

A. Full Legal Name 'Customer'

B. Full Registered Address

Telephone No...

Fax:.....

Email Id.....

C. Full Principal Operating Address (if
different from above)

D. Group Name (if any)

E. Name of CEO/MD/CMD

F. Name of key Beneficial Owner

G. Nature of Business Activity

H. Registration Number (CIN No)

I. Date of Incorporation

J. Legal Constitution

Public Ltd/Pvt Ltd Company/JV/Partnership

K. PAN No. of Company

L. GSTN Number

M. LEI Number

N. KYC Identifier No (if any)

O. Contact Person's Name
(Nodal Officer)

Mr./Ms.

Telephone No.

Mobile No.

Email ID.....

P. Details of All Directors of company (Separate Form A- optional)

No.	Name	Designation	Contact No.	Date of Birth	DIN No.	PAN No.	Full Address
1.							
2.							

(may attach the detail separately as annexure)

Q. Details of Senior Management of company (may attach the detail separately as annexure)

No.	Name	Designation	Contact No.	Date of Birth	Full Address
1.					
2.					

As per section 178 of Companies Act 2013, the expression "senior management" means personnel of the company who are members of its core management team excluding Board of Directors comprising all members of management one level below the executive directors, including the functional heads

R. Details of All Authorized Signatories (Separate Form A- mandatory)

Sr.	Name of Person	Designation
1.		
2.		
3.		
4.		

I/We hereby confirm that I/We have read and understood the requirement of KYC of PFS for compliance of Know Your Customer (KYC). I hereby agree that PFS can download the KYC detail from CKYC portal.

I/We hereby declare that the particulars given herein are true, correct and complete to the best of my/our knowledge and belief, the documents submitted along with this application are genuine and I/we am/are not making this application for the purpose of contravention of any Act, Rules, Regulations or any statute or legislation or any Notifications, Directions issued by any governmental or statutory authority from time to time. I/we hereby undertake to promptly inform PFS of any changes to the information provided hereinabove and agree and accept that PFS & any of their authorized representatives ('the Authorized Parties') are not liable or responsible for any losses, costs, damages arising out of any actions undertaken or activities performed by them on the basis of the information provided by me/us as also due to my not intimating /

delay in intimating such changes. I/we hereby authorize PFS to disclose, all / any of the information provided by me/us to the respective regulator/statutory body as may be deemed fit by PFS or the case may be. I/we hereby agree to provide any additional information / documentation that may be required by the Authorized Parties, in connection with this application.

Signature of the Authorized Representative

.....

Name of the company

Date.....

Place.....

Stamp of
company

List of Documents (duly signed, stamped by authorized signatory)**Mandatory Document**

1. Certificate of incorporation
2. Memorandum & Articles of Association

PTC India Financial Services Limited('PFS')

3. Copy of PAN
4. Resolution of the Board of Directors/Authority letter by CMD/MD/CEO/MTD/Director for Authorized person/s mentioned in this form.
5. Copy of Proof of Address (any of the following)
 - Utility bill which is not more than two months old of any service provider;
 - Form 18 and ROC receipt filed for recording change of registered address
 - Any other documents issued by Government showing Address
6. Form A of Authorized signatory alongwith Address and ID proof (Self attested)- applicable for the individuals signing the facility documents
7. Form A of key Promoter Director(s) alongwith Address and ID proof (Self attested or attested by Authorized Signatory)

**PFS has also right to ask any such other information/documents as may be required time to time or as per regulatory requirement.*

For Office Use only

Account Risk Classification *(tick yes or no)*

Are any of the directors, principal beneficiaries and shareholder present or former politically exposed person ('PEP')? (This includes immediate family members or close associates of a PEP)	Yes / No
Has the customer issued Bearer Shares? (Bearer shares are negotiable instruments that accord ownership of a corporation to the person who possesses the bearer share certificate)	Yes / No
Does the customer's business involve activities considered to be particularly vulnerable to money laundering risk such as gambling, defence, money services bureau or dealers in high value commodities <i>(such as trading in precious metals, jewellery and antiques)</i> or other applicable to local requirement.	Yes / No
Does the name of company or its key promoter director appears in the Sanction list by UN Council, or ISIL & Al-Qaida Sanctions list or Taliban Sanctions list maintained pursuant to Security Council resolutions	Yes / No
Does the relationship involve offshore trust structure which is not controlled by PFS or not subject to Customer Acceptance process? Where a third party is controlling the trust structure do they have non equivalent anti money laundering procedures in place	Yes / No
Is the customer incorporated/registered or conducting business/ operating in high risk jurisdiction	Yes / No
Is customer is non compliance of the compliance with implementation of Security Council Resolution on Democratic People's. Republic of Korea Order, 2017 and implementation of Section 51A of the Unlawful Activities (Prevention) Act, (UAPA) 1967 and Section 12 A of the WMD Act.	Yes / No
Is the customer has made any default in payment of interest on or re-payment of any loan, deposit, debenture in past	Yes / No
Does any of Director/CEO/senior employees of company directly/indirectly related with PFS or its any employee. If yes, kindly elaborate through separate sheet	Yes / No
Does the sector fall under special vulnerability as intimated by RBI/ Regulator	Yes / No

Category of the Customer after assessment: Category of the Customer (Risk Perception): <input type="radio"/> A High <input type="radio"/> B Medium <input type="radio"/> C Low	Signatures of Principal Officer Date of KYC process completed by Principal Officer
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PTC India Financial Services Limited('PFS')

Declaration for KYC (Know-Your-Customer)*(To be received annually/ at the time of Boarding (existing customer) on the letterhead of the Borrower)*

Date:

To

PTC India Financial Services Ltd
 7th Floor, Telephone Exchange Building,
 8 Bhikaji Cama Place, New Delhi 110066

Sub: *Name of Project/ purpose of loan:* Change in KYC

Dear Sir/Madam

I _____, as authorised signatory on behalf of the company _____
 confirm that there is change /no change in the KYC information provided by the company for the financial
 assistance availed from your esteemed organisation.

Information regarding KYC updation

Change in Shareholding of Company (Promoter having majority control)	Yes / No
Change in Certificate of incorporation	Yes / No
Change in Memorandum & Articles of Association	Yes / No
Change in PAN of the company	Yes / No
Change in Authorized signatories	Yes / No
Change in Address of the company	Yes / No
Others, please specify _____	

Note: In case of change in KYC information, Please submit new KYC form B, Form A along with documents as per PFS Policy. I/we agrees to submit the same within 15 days of such change intimated to PFS.

I/ We hereby agree that PFS can download the KYC detail from CKYC portal.

I/ We hereby declare that the information provided above is true and correct to the best of my knowledge.

Thanking You

Yours faithfully

 Signature of Authorised signatory with the rubber stamp of the company.

Format for the monitoring Loan Account under KYC Policy (To be reviewed half yearly)**Date of review :****No of loan accounts review :(list attached)**

Parameter	No of customers with status NO	No of customers with status YES	No of customers with status NOT ascertain
Are any of the directors, principal beneficiaries and shareholder present or former politically exposed person ('PEP')?			
Does the customer's business involve activities considered to be particularly vulnerable to money laundering risk such as gambling, defence, money services bureau or dealers in high value commodities (<i>such as trading in precious metals, jewellery and antiques</i>)			
Does the name of company or its key promoter director appears in the Sanction list by UN Council, or ISIL & Al-Qaida Sanctions list or Taliban Sanctions list maintained pursuant to Security Council resolutions			
Does the relationship involve offshore trust structure which is not controlled by PFS or not subject to Customer Acceptance process?			
Where a third party is controlling the trust structure do they have non equivalent anti money laundering procedures in place			
Is the customer incorporated/registered or conducting business/ operating in high risk jurisdiction (FATF non compliance country)			
Is customer is non compliance of the compliance with implementation of Security Council Resolution on Democratic People's. Republic of Korea Order, 2017 and implementation of Section 51A of the Unlawful Activities (Prevention) Act, (UAPA) 1967 and Section 12 A of the WMD Act.			
Does the sector fall under special vulnerability as intimated by RBI/ Regulator			
Is the customer has made any default in payment of interest on or re-payment of any loan, deposit, debenture in past			

The name of loan accounts where risk classification has been changed, is attached - Yes / No*The due diligence shall be done based on the review of applicable list available in public domain for validating the name of customer.**Confidentiality of KYC data as per RBI requirement has been maintained*

Format for the monitoring Loan Account under KYC Policy (To be reviewed half yearly)**Name of loan account****Date of review :**

Parameter	Yes/ No
Are any of the directors, principal beneficiaries and shareholder present or former politically exposed person ('PEP')?	
Does the customer's business involve activities considered to be particularly vulnerable to money laundering risk such as gambling, defence, money services bureau or dealers in high value commodities (<i>such as trading in precious metals, jewellery and antiques</i>)	
Does the name of company or its key promoter director appears in the Sanction list by UN Council, or ISIL & Al-Qaida Sanctions list or Taliban Sanctions list maintained pursuant to Security Council resolutions	
Does the relationship involve offshore trust structure which is not controlled by PFS or not subject to Customer Acceptance process?	
Where a third party is controlling the trust structure do they have non equivalent anti money laundering procedures in place	
Is the customer incorporated/registered or conducting business/ operating in high risk jurisdiction (FATF non compliance country)	
Is customer is non compliance of the compliance with implementation of Security Council Resolution on Democratic People's. Republic of Korea Order, 2017 and implementation of Section 51A of the Unlawful Activities (Prevention) Act, (UAPA) 1967 and Section 12 A of the WMD Act.	
Does the sector fall under special vulnerability as intimated by RBI/ Regulator	
Is the customer has made any default in payment of interest on or re-payment of any loan, deposit, debenture in past	

The due diligence shall be done based on the review of applicable list available in public domain for validating the name of customer

