
KNOW YOUR CUSTOMER AND ANTI-MONEY LAUNDERING POLICY

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Introduction

Arthya Wealth and Investments Private Limited (“Arthya”) is registered as an Investment Advisor (IA) with Securities and Exchange Board of India (“SEBI”) under the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013 (“**Regulations**”) bearing the registration number **INP000015279**.

1. Purpose of the policy

In accordance with the SEBI Master Circular on KYC/AML¹, Arthya is required to prepare a policy for dealing with money laundering and terrorist financing, reflecting the current statutory and regulatory requirements.

By means of this policy (“**Policy**”), Arthya will endeavour to adopt the spirit of the guidance and directives of SEBI and provisions of Prevention of Money Laundering Act, 2002 (“**PMLA**”) along with Prevention of Money Laundering (Maintenance of Records) Rules, 2005 (“**PMLR**”) and prevent itself from being used, intentionally or unintentionally, by criminal persons or entities for money laundering and other unlawful activities.

2. Scope and applicability of the Policy

The scope of this Policy includes standards for client acceptance, client identification, risk management, transaction monitoring and overall due diligence. This Policy also provides for the key appointments as well as various reporting is required to make to the relevant authorities/platforms. The provisions of this Policy will be applicable to all employees, directors, principal officer, compliance officer, other officials, agents and clients of Arthya.

3. Key Definitions

For the purpose of this Policy, key definitions are as follows:

- a) **Client/customer/investor** – a person who is engaged in a financial transaction or activity with Arthya and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting.

¹ SEBI Master Circular SEBI/HO/MIRSD/DOP/CIR/P/2019/113 dated October 15, 2019.

- b) “Officially Valid Documents” or “OVD” means either of the following –
- a. the passport;
 - b. the driving licence;
 - c. proof of possession of Aadhaar number;
 - d. the voter’s identity card issued by Election Commission of India;
 - e. job card issued by NREGA duly signed by an officer of the State Government; and
 - f. the letter issued by the National Population Register containing details of name, address, or any other document as notified by the Central Government in consultation with the regulator.
- c) **Politically Exposed Persons / PEPs** – 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.
- d) **Suspicious transaction** - a transaction, including an attempted transaction, whether or not made in cash, which, to a person acting in good faith:
- i. gives rise to a reasonable ground of suspicion that it may involve proceeds of an offence specified in the schedule to PMLA, regardless of the value involved; or
 - ii. appears to be made in circumstances of unusual or unjustified complexity; or
 - iii. appears to not have economic rationale or bona-fide purpose; or
 - iv. gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

Transaction involving financing of the activities relating to terrorism includes transaction involving funds suspected to be linked or related to, or to be used for terrorism, terrorist acts or by a terrorist, terrorist organization or those who finance or are attempting to finance terrorism.

4. Key Appointments

The following are the key appointments for the purpose of this Policy:

Principal Officer

The Principal Officer shall be a designated officer appointed by Arthya who shall along with the compliance officer appointed under the Regulations shall discharge the functions with objectivity and authority and shall be responsible for:

- Ensuring that the relevant reporting's are being made to the concerned authorities;
- Acting as a central reference point in facilitating onward reporting of suspicious transactions;
- Actively identifying and assessing potentially suspicious transactions;
- Making relevant reporting to the Designated Director of Arthya; and
- Maintaining close liaisons with the regulator and other supervising authorities.

Designated Director

The Designated Director shall be the compliance officer of Arthya appointed in accordance with the Regulations who shall have a power to exercise compliances as required under the Regulations. The Designated Director shall be responsible to ensure the overall compliance with the obligations imposed under Chapter IV of the PMLA and PMLR.

5. Client Due Diligence (“CDD”)

CDD involves identifying and verifying each of the investor in Arthya to determine the money laundering and terrorism financing risk posed by each investor.

Arthya will perform CDD procedure when establishing relationship with the client. Such due diligence will be performed on the basis of the following three parameters:

- Policy for acceptance of clients;
- Procedure for identifying the clients; and
- Transaction monitoring and reporting especially Suspicious Transactions Reporting (“STR”).

The following key activities shall form part of the CDD:

- Obtaining sufficient information from the client to identify the beneficial owner (“BO”).

The customer identification procedure to identify a BO is stated in **Annexure I**;

- Verifying the client's identity by using reliable, independent source documents, data or information in addition to the information obtained from the client;
- Verifying the identity of the BO of the client and/or the person on whose behalf a transaction is being conducted, corroborating the information provided in relation to **Annexure I**;
- Understanding the ownership and control structure of the client;
- Conducting ongoing due diligence and scrutiny; and
- Enhanced client due diligence process for higher risk categories of clients and simplified client due diligence process for lower risk categories of clients, if deemed fit, shall be conducted; and
- Periodically updating all documents, data or information of all clients collected during the CDD process.

6. Policy for acceptance of clients

By means of this client acceptance policy, Arthya lays down the principles it shall consider at the time of accepting a new investor and accordingly apply the risk assessment procedure and investor identification formalities.

- No account shall be opened in a fictitious / benami name or on an anonymous basis.
- No account shall be opened where Arthya is unable to apply appropriate CDD measures/ Know-Your Client (“KYC”) policies and shall file a suspicious activity report.
- No account shall be opened where it is not possible to ascertain the identity of the investor, or the information provided to Arthya is suspected to be non-genuine, or there is perceived non - co-operation of the client in providing full and complete information.
- The risk parameters, that will classify the investor into high risk, medium risk and low risk, will be defined. Investors of special category (as given below) may, if necessary, be classified even higher. Such investors require higher degree of due diligence and regular update of KYC profile.
- Documentation requirements and other information shall be collected in respect of different classes of investor depending on the perceived risk and in light of the PMLR and SEBI guidelines.
- Arthya shall be ensured that the identity of the investor /beneficial owner does not match with any person having known criminal background or is not banned in any other manner.

Arthya shall necessarily check the details of the investor /beneficial owner against the United Nations (“UN”) Sanctions list as circulated by SEBI from time to time.²

- Client due diligence mechanism will be revisited in the event that suspicions of money laundering and financing of terrorism arise.

7. Risk framework

Arthya may be exposed to various risks, both on account of its own nature / activities and the attributes of its investors such as their location (registered office address, correspondence addresses and other addresses if applicable), identity, nature of business activity, trading turnover, manner of making payment for transactions undertaken, etc. Based on these parameters, Arthya will then apply enhanced or simpler due diligence measures.

Risk assessment

- Arthya shall carry out risk assessment to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk with respect to its clients.
- The risk assessment shall also take into account any country specific information that is circulated by the Government of India and SEBI from time to time, as well as, the updated list of individuals and entities who are subjected to sanction measures as required under the various UN Security Council Resolutions (these can be accessed at the UN Security Council website).
- The risk assessment carried out shall consider all the relevant risk factors before determining the level of overall risk and the appropriate level and type of mitigation to be applied. The assessment shall be documented, updated regularly and made available to competent authorities and self-regulating bodies, as and when required.

² An updated list of individuals and entities which are subject to various sanction measures such as freezing of assets/accounts, denial of financial services etc., as approved by the Security Council Committee established pursuant to various United Nations' Security Council Resolutions (UNSCRs) can be accessed at:

- <http://www.un.org/sc/committees/1267/consolist.shtml>
- <http://www.un.org/sc/committees/1988/list.shtml>

Categorizing the client

Basis the predetermined risk parameters, Arthya may classify its client into low, medium or high risk.

Examples of high-risk client (Clients of special category – CSC)

- Non- resident clients;
- High net worth individuals;
- Trusts, charities, non-governmental organizations (NGOs) and organizations receiving donations;
- Companies having closed family shareholding or beneficial ownership;
- Politically Exposed Persons (PEPs);
- Companies offering foreign exchange offerings;
- Persons in high risk jurisdictions;
- Non face to face clients; and
- Persons with dubious reputation as per publicly available information.

Examples of low risk client

- Public limited companies;
- Agencies incorporated by the Government;
- Sovereign wealth funds; and
- Entities and individuals whose identities and sources of wealth can be easily determined.

The above mentioned categorisation is only illustrative and Arthya shall exercise independent judgment to ascertain whether any other set of client shall be classified in the same manner or not.

8. Client Identification Procedure

Arthya shall implement effective client identification procedures after the risk categorisation of the client is done. This identification shall be carried out at the following occasions:

- While commencing a new relationship with a client.
- When there is uncertainty about the authenticity or adequacy of the identification data of an existing client.

- If any suspicions of money laundering or financing of activities relating to terrorism arise, for existing clients.
- When carrying out transactions for the client.

For the purpose of client identification, Arthya shall adhere to the following principles:

- Arthya shall identify the client by using reliable sources including documents / information.
- Arthya shall obtain adequate information about the identity of each client and the purpose of the intended nature of the relationship.
- The obtained information must be adequate enough to satisfy competent authorities (regulatory / enforcement authorities) in future that due diligence was observed by Arthya in compliance with applicable laws.
- Each original document shall be seen prior to acceptance of a copy.
- Failure by a prospective client to provide satisfactory evidence of identity shall reported to a higher authority within Arthya.
- Irrespective of the category of the client or investment made by the client or any other reason, no exemption shall be provided for carrying out the expected level of due diligence (including identification) of the client.
- Arthya will be registered with the Central KYC Records Registry (“CKYCR”) and KYC Registration Agency (“KRA”) as required under the SEBI (KYC Registration Agency) Regulations, 2011, and the KYC details of new/ existing client, as and when required shall be uploaded on these repositories, as prescribed under SEBI regulations.
- While establishing any relationship with the client, the Principal Officer will download the client details from the KRA system to verify its identity. In case of any changes in the KYC information / details of the client, upon receipt of such information, the designated person will be responsible for updating the details in the KRA system.
- The Principal Officer will periodically scan all existing client relationships to ensure that no relationship is established with or linked to any of the entities or individuals included in the UN Sanctions list or any other internal list maintained by Arthya. Full details of resemblance with any of the individuals/entities in the list will immediately be intimated to SEBI and Financial Intelligence Unit – India.

Politically Exposed Persons

- Arthya shall actively aim to identify PEPs and implement appropriate risk management systems for the same. This requirement shall apply for an existing client or a potential client or the beneficial owner of a client.
- Arthya shall seek relevant information from the client, refer to publicly available information or access the commercial electronic databases of PEPs.
- Senior management approval shall be taken for establishing business relationships with PEPs.
- Where a client has been accepted and the client or beneficial owner is subsequently found to be, or subsequently becomes a PEP, senior management approval shall be taken to continue the business relationship.
- Arthya shall also take reasonable measures to verify the sources of funds as well as the wealth of clients and beneficial owners identified as PEP.

Arthya may undertake digital KYC as detailed in **Annexure II** and in accordance with applicable laws. **Annexure III** comprises of the list of KYC Documents to be accepted from client for the purpose of identification and verification.

CDD conducted by third parties

Arthya may engage a third party for the purpose of:

- a) identification and verification of the identity of a client and
- b) determination of whether the client is acting on behalf of a beneficial owner, identification of the beneficial owner and verification of the identity of the beneficial owner.

It shall also be ensured that:

- Arthya, within two days of completion of due diligence by third-party, obtains from the third-party records or the information of the client due diligence carried out by the third party.
- Arthya takes adequate steps to satisfy itself that copies of identification data and other relevant documentation relating to the client due diligence requirements will be made available from the third party upon request immediately.

- The third party is regulated, supervised or monitored for, and has measures in place for compliance with client due diligence and record-keeping requirements in line with the requirements and obligations under the PMLA.
- The third party is not based in a country or jurisdiction assessed as high risk.

Arthya shall be ultimately responsible for client due diligence and undertaking enhanced due diligence measures, as applicable.

9. Transaction Monitoring

Arthya shall regularly monitor the client transactions, that it has executed or is otherwise aware of, to check whether such transactions are in line with the expected activity of the client.

- Special attention shall be paid to all complex unusually large transactions / patterns which appear to have no economic purpose and specify internal threshold limits where deemed necessary.
- The background including all documents / office records / memorandums / clarifications sought pertaining to such transactions and purpose thereof shall also be examined carefully and findings shall be recorded in writing.
- All such findings, records and related documents shall be made available to auditors and also to SEBI/stock exchanges/ Financial Intelligence Unit – India (“**FIU-IND**”)/ other relevant authorities, during audit, inspection or as and when required.
- Arthya shall randomly examine a selection of transactions undertaken by client to comment on their nature i.e. whether they are in the nature of suspicious transactions or not.

Suspicious Transaction Monitoring (“STR”)

Arthya shall implement a robust mechanism for identifying and reporting suspicious transactions. The Principal Officer shall be immediately apprised in the event any suspicious transaction has been identified by means of a detailed report comprising all the necessary particulars related to the transaction/client. It will be ensured that all the suspicious transactions are reported to the Principal Officer who will report the same in a STR to the Director, FIU-IND. The Principal Officer and other

appropriate compliance, risk management and related staff members shall be provided access to client identification data and CDD information, transaction records and other relevant information.

Arthya shall ensure that there is continuity in dealing with the client as normal until told otherwise and the client shall not be told of the report/ suspicion.

If transactions are abandoned or aborted by clients on being asked to give some details or to provide documents, Arthya shall report all such attempted transactions in STRs, even if not completed by clients, irrespective of the amount of the transaction.

10. Record Keeping

Record keeping and retention

The objective of record keeping is to allow easy and quick retrieval of data as and when requested by the competent authorities. Arthya shall take appropriate steps to evolve an internal mechanism for proper maintenance and preservation of such records and information.

Arthya will maintain the records of identification and transactions as follows:

- Transaction related records – All necessary records on transactions, both domestic and international, shall be maintained at least for the minimum period as has been prescribed under the relevant regulations. Records of transactions captured in reports submitted to the FIU-IND have to be maintained and preserved for a period of 5 (five) years from the date of transactions between the client and Arthya.
- Identity records / account files / business correspondence of client - To be maintained for a period of 5 (five) years after the business relationship between the client and the Arthya has ended or the account has been closed, whichever is later.

Where required by the investigating authorities, Arthya shall retain certain records exceeding the above-mentioned period.

In situations where the records relate to on-going investigations or transactions which have been the subject of a suspicious transaction reporting, records shall be retained until it is confirmed that the case has been closed.

Periodic updation of KYC

Arthya shall periodically update all documents, data or information of all clients and beneficial owners collected under the CDD process.

*Compliance with Foreign Account Tax Compliant Act (“**FATCA**”)*

The Principal Officer will at the time of conducting client due diligence and at various subsequent intervals undertake necessary due diligence of all the reportable accounts as prescribed under FATCA and Common Reporting System (“**CRS**”) guidelines, i.e. United States reportable accounts as well as other reportable accounts. Further, such information will be maintained and reported in the prescribed forms.

11. Combating financing of terrorism

Arthya, upon receipt of the list of individuals and entities subject to UN sanctions (referred to as designated lists) from SEBI / Government, from time to time, will screen all its investors against such list and report such details to SEBI and FIU-IND in case any match is found. Arthya shall also ensure that it will not engage with anyone whose name appears in sanctions list. Arthya will also ensure expeditious and effective implementation of the procedure prescribed under Section 51A of Unlawful Activities (Prevention) Act, 1967 with regard to freezing/ unfreezing of financial assets of the designated individuals/entities enlisted in the United Nation Security Council Resolution (UNSCR) and especially, with regard to funds, financial assets or economic resources or related services held in the form of securities, if any.

12. Key reporting platforms

KYC Registration Agency

- Arthya shall maintain its registration with CDSL Ventures Ltd (CVL KRA) for the purpose of KYC compliance.

- Arthya shall perform the initial KYC/due diligence of the client, upload the KYC information with proper authentication, including the scanned images of the KYC documents, on the system of the KRA within [10 working days] from the date of execution of documents by the client, and retain the physical KYC documents.
- If the client is already registered with the KRA, Arthya shall verify and download the client's details from the system of KRA.
- If the client informs Arthya of changes in his/her KYC details and status or when such information comes to the knowledge of Arthya, at any stage, Arthya shall be responsible for uploading the updated information on the system of KRA and retaining the physical documents.

Central KYC Registry

- Arthya shall maintain its registration with CKYCR for the purpose of KYC compliance.
- Arthya will file electronic copy of the client's KYC records with the CKYCR within a reasonable amount of time.
- In the event that a client already possesses and submits a KYC identifier to Arthya, Arthya shall retrieve the KYC records online from the CKYCR by using the KYC identifier.
- In the event that Arthya receives updated or additional information about the client, it shall as soon as possible furnish the updated information to the CKYCR.

Financial Intelligence Unit – India

- Arthya shall maintain its registration with FIU-IND for making critical reportings.
- Any changes in the name, designation and address of the “Designated Director” or the “Principal Officer” shall be communicated to FIU-IND.

The following reporting shall be furnished to FIU-IND:

Report	Relevant transactions	Due Date	NIL Reporting
Cash Transaction Report	- all cash transactions of the value of more than ten lakh rupees or its equivalent in foreign currency; or	every month by the 15th day of the succeeding month	No

Registered Address: Unit no 712, 7th Floor, The Summit – Business Bay, Andheri - Kurla Road, Off. Western Express highway, Andheri East, Mumbai-400069

(wherever applicable)	- all series of cash transactions integrally connected to each other which have been individually valued below rupees ten lakh 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		
Counterfeit Currency Report	- 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	every month by the 15th day of the succeeding month	Yes
Suspicious Transaction Reports	- all suspicious transactions, as defined previously, whether or not made in cash	not later than seven days on being satisfied that the transaction is suspicious	No
Non-Profit Organisation Transaction Report (NTR)	- all transactions involving receipts by non-profit organisations of value more than rupees ten lakh, or its equivalent in foreign currency	every month by the 15th day of the succeeding month	No

Arthya shall have suitable processes in place for detecting transactions as mentioned above and for furnishing information about such transactions as specified by FIU-IND and the SEBI.

The Principal Officer will be responsible for the timely submission of the reports to FIU-IND and shall ensure that confidentiality is maintained at the time of submission.

Arthya shall not put any restrictions on the activity where an STR has been made. Any suspicious transaction shall be immediately notified to the Principal Officer. It shall be ensured that there is no tipping off to the client at any level. The Principal Officer shall record his reasons for treating any transaction or a series of transactions as suspicious. It shall be ensured that there is no undue delay in arriving at such a conclusion.

13. General compliances

Internal Audit and Compliance function

The internal audit function shall be independent, adequately resourced and commensurate with the size of the business and operations, organization structure, number of client and other such factors of Arthya.

The internal audit or compliance function shall be responsible for:

- Implementing overall measures to ensure compliance with the policies, procedures, and controls relating to the prevention of money laundering and terrorism financing.
- Conducting testing of the system for detecting suspected money laundering transactions.
- Assessing and checking the adequacy of exception reports generated on large and/or irregular transactions.
- Assessing the quality of reporting of suspicious transactions.
- Determining the level of awareness of front-line staff, of their responsibilities in this regard, etc.

Employee hiring and training

Adequate screening procedures shall be implemented to ensure that suitable employees are being onboarded/have been onboarded. Important positions in Arthya must be identified with regards to the risk of money laundering and terrorist financing and the size of operations. Key compliance persons such as the Principal Officer and Designated Director must be qualified to perform their duties.

Arthya shall ensure that all its employees/directors understand the contents of this Policy and its rationale. The employees/ directors must be made aware of money laundering and terrorism financing risks for which ongoing employee training programs must be in place so that the members of the staff are adequately trained in anti-money laundering and combating financing of terrorism (“AML/CFT”) procedures. Training requirements may be customised depending on the nature of activity undertaken by the employee.

Client Education

Since personal information is being collected from the clients, Arthya shall endeavor to educate the clients on the purpose and need for collecting such information, especially in light of AML /CFT requirements. Arthya shall prepare specific literature/ pamphlets etc. to inform the client of the objectives of the AML/CFT programme.

14. Review of Policy

This Policy will be reviewed on an annual basis or earlier, if required, in light of the changes in regulatory framework or for business or operational reasons. To maintain the effectiveness of this Policy, the person doing such a review shall be different from the one who has framed this Policy.

15. Clarifications

In case any further information /clarifications required in this regard, the [Designated Director/Principal Officer] maybe contacted.

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Phone No: 7045360063

E-mail address: gaurav@arthyawealth.com

For Arthya Wealth and Investments Private Limited



Smitha Jain Arora

Compliance Officer



[Annexures to follow]

Annexure I – Customer Identification Requirements

For Identity of Beneficial Owner

The beneficial owner for different categories of juridical persons is as below:

Company or partnership

a) The identity of the natural person, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest.

Explanation: Controlling ownership interest means ownership of/entitlement to:

- i. more than 25% of shares or capital or profits of the juridical person, where the juridical person is a company;
- ii. more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership; or
- iii. more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.

b) In cases where there exists doubt under clause (a) above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity of the natural person exercising control over the juridical person through other means.

Explanation: Control through other means can be exercised through voting rights, agreement, arrangements or in any other manner.

c) Where no natural person is identified under clauses (a) or (b) above, the identity of the relevant natural person who holds the position of senior managing official.

Trust

Where the client is a trust, Arthya shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the identity of the settler of the trust, the trustee, the protector, 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.

Exemption in case of listed companies: Where the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

Applicability for foreign clients: Whenever, Arthya is dealing with foreign clients may be guided by the clarifications issued vide SEBI circulars CIR/MIRSD/11/2012 dated September 5, 2012 and CIR/ MIRSD/ 07/ 2013 dated September 12, 2013, for the purpose of identification of beneficial ownership of the client.

The Principal Officer shall be responsible for ensuring compliance with the provisions on identification of beneficial ownership.

Annexure II - Digital KYC Process

- In order to enable the online KYC process for establishing account-based relationship with Arthya, client's KYC may be completed through online / app-based KYC, in-person verification through video, online submission of Officially Valid Document (OVD) / other documents under eSign, in the following manner:
 - i. The client visits the website/app/digital platform of Arthya and fills up the online KYC form and submits requisite documents online.
 - ii. The name, photograph, address, mobile number, email-id, bank details of the client shall be captured online and OVD / PAN / signed cancelled cheque shall be provided as a photo / scan of the original under eSign and the same shall be verified as under:
 - a. Mobile number and email address are verified through One Time Password (OTP) or other verifiable mechanism. The mobile number/s of the client accepted as part of KYC should preferably be the one linked with Aadhaar.
 - b. Aadhaar is verified through UIDAI's authentication / verification mechanism. Further, Arthya shall, where the client submits his Aadhaar number, ensure that such client to redact or blackout his Aadhaar number through appropriate means where the authentication of Aadhaar number is not required. Arthya shall not store/ save the Aadhaar number of clients in its system. e-KYC through Aadhaar authentication service of UIDAI or offline verification through Aadhaar QR Code/ XML file can be undertaken, provided the XML file or Aadhaar secure QR Code generation date is not older than 3 (three) days from the date of carrying out KYC.
 - c. PAN is verified online using the Income Tax database.
 - d. Bank account details are verified by penny drop mechanism or any other mechanism using application program interface of the bank. The name and bank details as obtained shall be verified with the information provided by client.

- e. Any OVD other than Aadhaar shall be submitted through Digilocker / under eSign mechanism.

- Once all the information as required as per the online KYC form is filled up by the client, KYC process could be completed as under:
 - a. The client would take a printout of the completed KYC form and after affixing their wet signature, send the scanned copy / photograph of the same to Arthya under eSign, or
 - b. Affix online the cropped signature on the filled KYC form and submit the same to Arthya under eSign.

- Arthya may implement their own application (App) for undertaking online KYC of client. The App shall facilitate taking photograph, scanning, acceptance of OVD through Digilocker, video capturing in live environment, usage of the App only by authorized person of Arthya.

- To enable ease of completing in-person verification of the client, Arthya may undertake the video in-person verification of an individual client through its App.

Annexure III - KYC Documentation

- Self-attested copy of PAN card is mandatory for all clients, including Promoters/Partners/Karta and whole-time directors and persons authorized to deal in securities on behalf of company/firm/others.
- Copies of all the documents submitted by the applicant should be self-attested and accompanied by originals for verification.
- The customer must upload electronic copies of any one of the officially valid documents. The documents must be proper, legible and relevant in order to safely identify the customer. It is implied that proof of address also follows from the above documents only. For cross verification, Arthya should require the customer to show the original copy of the official document for the verification and confirmation of the duplicate certified copy that may be submitted by the customers. Arthya shall verify the name, date of birth, address and other identity details and credentials of the customers from the official documents submitted by them and take notice of adverse remark(s) / observation(s), if any, made in the official document.
- In case of individuals, proof of identity (POI) and proof of address (POA) are the requisite documents.
- In case of non-individuals, additional documents to be obtained from non-individuals, over & above the POI & POA, as mentioned below:

Types of entity	Documentary requirements
Corporate	<ul style="list-style-type: none"> • Copy of the balance sheets for the last 2 financial years (to be submitted every year). • Copy of latest share holding pattern including list of all those holding control, either directly or indirectly, in the company in terms of SEBI takeover regulations, duly certified by the company secretary/whole time director/managing director (to be submitted every year). • Photograph, proof of identity (POI), proof of address (POA), PAN and DIN numbers of whole-time directors/two directors in charge of day to day operations. • Photograph, POI, POA, PAN of individual promoters holding control - either directly or indirectly.

	<ul style="list-style-type: none"> • Copies of the memorandum and articles of association and certificate of incorporation. • Copy of the board resolution for investment in securities market. • Authorised signatories list with specimen signatures.
Partnership firm	<ul style="list-style-type: none"> • Copy of the balance sheets for the last 2 financial years (to be submitted every year). • Certificate of registration (for registered partnership firms only). • Copy of partnership deed. • Authorised signatories list with specimen signatures. • Photograph, POI, POA, PAN of partners.
Trust	<ul style="list-style-type: none"> • Copy of the balance sheets for the last 2 financial years (to be submitted every year). • Certificate of registration (for registered trust only). • Copy of trust deed. • List of trustees certified by managing trustees/CA. • Photograph, POI, POA, PAN of trustees.
Banks/Institutional Clients	<ul style="list-style-type: none"> • Copy of the constitution/registration or annual report/balance sheet for the last 2 financial years. • Authorized signatories list with specimen signatures.

Proof of Identity (POI):

List of documents admissible as proof of identity:

- Unique Identification Number (UID) (Aadhaar)
- Passport
- Voter ID card
- Driving license
- PAN card with photograph
- Identity card/ document with applicant's Photo, issued by any of the following:
Central/State Government and its Departments, Statutory/Regulatory Authorities, Public

Registered Address: Unit no 712, 7th Floor, The Summit – Business Bay, Andheri - Kurla Road, Off. Western Express highway, Andheri East, Mumbai-400069

Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions, Colleges affiliated to Universities, Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members; and Credit cards/Debit cards issued by Banks.

Proof of Address (POA):

List of documents admissible as Proof of Address:

(*Documents having an expiry date should be valid on the date of submission.)

- Unique Identification Number (UID) (Aadhaar)
- Passport
- Voters Identity Card
- Ration Card
- Registered Lease or Sale Agreement of Residence/ Driving License/ Flat Maintenance bill/ Insurance Copy
- Utility bills like Telephone Bill (only land line), Electricity bill or Gas bill - Not more than 3 months old.
- Bank Account Statement/Passbook -- Not more than 3 months old.
- Self-declaration by High Court and Supreme Court judges, giving the new address in respect of their own accounts.
- Proof of address issued by any of the following: Bank Managers of Scheduled Commercial Banks/Scheduled Co-operative Bank/Multinational Foreign Banks/Gazetted Officer/Notary public/elected representatives to the Legislative Assembly/Parliament/Documents issued by any Govt. or Statutory Authority.
- Identity card/document with address, issued by any of the following: Central/State Government and its Departments, Statutory/Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions, Colleges affiliated to Universities and Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members.
- The proof of address in the name of the spouse may be accepted.

KYC documentation applicable for foreign portfolio investor (FPIs) shall be as under:-

Sr. No	Document Type	KYC Documentation	Category - I	Category - II
1	Applicant Level	Constitutive Documents (Memorandum of Association, Certificate of Incorporation, prospectus etc.)	Required	Required
2		Proof of Address ¹	Required	Required
3		PAN	Required	Required
4		Board Resolution ²	Not required	Required
5		FATCA / CRS form	Required	Required
6		Form/ KYC Form	Required	Required
7	Authorised Signatories	List of Signatures ²	Required	Required
8	Ultimate Beneficial Owner (UBO)	List of UBO including the details of Intermediate BO ³	Required	Required
9		Proof of Identity	Not Required	Required

¹ Power of attorney having address provided to custodian is accepted as address proof.

² Power of attorney granted to global custodian/ local custodian is accepted in lieu of board resolution. The board resolution and the authorized signatory list is not required if SWIFT is used as a medium of instruction.

³ UBO is not required for government and government related entities.

- i. For FPI Category - I coming from high-risk jurisdiction (other than those registered under Regulation 5(a)(i) of the SEBI (Foreign Portfolio Investors) Regulations, 2019), the KYC documentation equivalent to FPI Category II shall apply.
- ii. For FPI Category – II registered under Regulation 5(b)(i) of the SEBI (Foreign Portfolio Investors) Regulations, 2019, shall provide KYC documentation equivalent to FPI Category - I. However, BO details need to be provided in specified format.