



RAR FINCARE LIMITED

RAR FINCARE LIMITED	
POLICY	KYC AML Policy
Approving Authority:	Board of Directors
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Introduction

RBI has announced comprehensive KYC policies for Financial Institutions in the context of Prevention of Money-Laundering Act, 2002, the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005, as amended from time to time by the Government of India and Aadhaar and other Laws (amendment) Ordinance, 2019 as notified by the Government of India.

In view of the RBI Master Direction – RBI/DBR/2015-16/18 Master Direction DBR.AML.BC.No.81/14.01.001/2015-16, RAR Fincare Limited (“**RAR Fincare**” or “**Company**”) has adopted a comprehensive KYC and AML policy with suitable modifications depending on the business activity undertaken by it. The policy has been put in place after being duly approved by its Board of Directors.

Definitions

Terms bearing meaning assigned in terms of Prevention of Money-Laundering Act, 2002 and the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005:

- i. "Aadhaar number", as defined in the Aadhaar and Other Law (Amendment) Ordinance, 2019, means an identification number issued to an individual under sub-section (3) of section 3 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 (18 of 2016), and includes any alternative virtual identity generated under sub-section (4) of that section
- ii. "Act" and "Rules" means the Prevention of Money-Laundering Act, 2002 and the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005, respectively and amendments thereto
- iii. "Authentication", in the context of Aadhaar authentication, means the process as defined under sub-section (c) of section 2 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016
- iv. Beneficial Owner (BO): shall have the meaning as per table below

Type of Customer	Persons to be considered Beneficial Owners (BOs)
Companies	<p>a) A natural person who, whether acting alone or together, or through one or more juridical person, has/have an ownership of or entitlement to more than 10 percent of shares or capital or profits of the company; or</p> <p>b) A natural person who whether acting alone or together, or through one or more juridical person, has/have the right to appoint majority of the directors or to control the management or policy decisions including by virtue of their shareholding or management rights or shareholders agreements or voting agreements;</p>

Partnership Firm	a) A natural person who, whether acting alone or together, or through one or more juridical person, has/have an ownership of/ entitlement to more than 10 percent of capital or profits of the partnership; or who exercises control through other means (“control” shall include the right to control the Management or policy decision)
Unincorporated association of persons or body of individuals	a) A natural person who whether acting alone or together, or through one or more juridical person, has/have an ownership of/ entitlement to more than 15 percent of property or capital or profits of such association or body of individuals;
Trust/ Foundation	a) The Author of the trust; or b) The Trustees of the trust; or c) The Beneficiaries of the trust with 10 percent or more interest in the trust; or d) A natural person exercising ultimate effective control over the trust through a chain of control or ownership

v. “Certified Copy of OVD” - Obtaining a certified copy by RAR Fincare Limited shall mean comparing the copy of officially valid document so produced by the customer with the original and recording the same on the copy by the authorized officer of RAR Fincare Limited.

Provided that in case of Non-Resident Indians (NRIs) and Persons of Indian Origin (PIOs), as defined in Foreign Exchange Management (Deposit) Regulations, 2016 {FEMA 5(R)}, alternatively, the original certified copy of OVD, certified by any one of the following, may be obtained:

- Authorized officials of overseas branches of Scheduled Commercial Banks registered in India,
- Branches of overseas banks with whom Indian banks have relationships,
- Notary Public abroad,
- Court Magistrate,
- Judge,
- Indian Embassy/Consulate General in the country where the non-resident customer resides

vi. “Central KYC Records Registry” (CKYCR) means an entity defined under Rule 2(1) (aa) of the Rules, to receive, store, safeguard and retrieve the KYC records in digital form of a customer

vii. “Designated Director” means a person designated by RAR Fincare Limited to ensure overall compliance with the obligations imposed under chapter IV of the PML Act and the Rules and shall include:

- a. the Managing Director or a whole-time Director, duly authorized by the Board of Directors

Mr. Govindarajulu Rajendran Ananthapadmanabhan shall be the 'Designated Director' of the Company for the purposes of this Policy.

Explanation - For the purpose of this clause, the terms "Managing Director" and "Whole-time Director" shall have the meaning assigned to them in the Companies Act, 2013.

viii. "Officially Valid Document" (OVD) means the passport, the driving license, proof of possession of Aadhaar number, the Voter's Identity Card issued by the Election Commission of India, job card issued by NREGA duly signed by an officer of the State Government and letter issued by the National Population Register containing details of name and address

Provided that,

- a. Where the customer submits his proof of possession of Aadhaar number as an OVD, he may submit it in such form as are issued by the Unique Identification Authority of India
- b. Where the OVD furnished by the customer does not have updated address, the following documents shall be deemed to be OVDs for the limited purpose of proof of address: -
 - i. Utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill);
 - ii. Property or Municipal tax receipt;
 - iii. Pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings, if they contain the address;
 - iv. Letter of allotment of accommodation from employer issued by State Government or Central Government Departments, statutory or regulatory bodies, public sector undertakings, scheduled commercial banks, financial institutions and listed companies and leave and license agreements with such employers allotting official accommodation;
- c. The customer shall submit OVD with current address within a period of three months of submitting the documents specified at 'b' above
- d. Where the OVD presented by a foreign national does not contain the details of address, in such case the documents issued by the Government departments of foreign jurisdictions and letter issued by the Foreign Embassy or Mission in India shall be accepted as proof of address

Explanation: For the purpose of this clause, a document shall be deemed to be an OVD even if there is a change in the name subsequent to its issuance provided it is supported by a marriage certificate issued by the State Government or Gazette notification, indicating such a change of name.

- ix. "Offline Verification", as defined in the Aadhaar and Other Law (Amendment) Ordinance, 2019, means the process of verifying the identity of the Aadhaar number holder without authentication, through such offline modes as may be specified by the Aadhaar regulations
- x. "Person" has the same meaning assigned in the Act and includes:
 - a. an individual,
 - b. a Hindu undivided family,

- c. a company,
 - d. a firm,
 - e. an association of persons or a body of individuals, whether incorporated or not,
 - f. every artificial juridical person, not falling within any one of the above persons (a to e), and
 - g. any agency, office or branch owned or controlled by any of the above persons (a to f)
- xi. "Principal Officer" means an officer nominated by RAR Fincare Limited, responsible for furnishing information as per rule 8 of the Rules
- xii. "Suspicious transaction" means a "transaction" as defined below, including an attempted transaction, whether made in cash, which, to a person acting in good faith:
- a. Gives rise to a reasonable ground of suspicion that it may involve proceeds of an offence specified in the Schedule to the Act, regardless of the value involved; or
 - b. Appears to be made in circumstances of unusual or unjustified complexity; or
 - c. Appears to not have economic rationale or bona-fide purpose; or
 - d. Gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism
- Explanation: 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.*
- xiii. "Transaction" means a purchase, sale, loan, pledge, gift, transfer, delivery or the arrangement thereof and includes:
- a. Opening of an account;
 - b. Deposit, withdrawal, exchange or transfer of funds in whatever currency, whether in cash or by cheque, payment order or other instruments or by electronic or other non-physical means;
 - c. The use of a safety deposit box or any other form of safe deposit;
 - d. Entering any fiduciary relationship.
 - e. Any payment made or received, in whole or in part, for any contractual or other legal obligation; or
 - f. Establishing or creating a legal person or legal arrangement

Terms bearing meaning assigned in this Directions, unless the context otherwise requires, shall bear the meanings assigned to them below:

- i. "Common Reporting Standards" (CRS) means reporting standards set for implementation of multilateral agreement signed to automatically exchange information based on Article 6 of the Convention on Mutual Administrative Assistance in Tax Matters
- ii. "Customer" means a person who is engaged in a financial transaction or activity with RAR Fincare Limited and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting
- iii. "Walk-in Customer" means a person who does not have an account-based relationship with RAR Fincare Limited, but undertakes transactions with RAR Fincare Limited
- iv. "Customer Due Diligence (CDD)" means identifying and verifying the customer and the beneficial owner
- v. "Customer identification" means undertaking the process of CDD

- vi. "FATCA" means Foreign Account Tax Compliance Act of the United States of America (USA) which, inter alia, requires foreign financial institutions to report about financial accounts held by U.S. taxpayers or foreign entities in which U.S. taxpayers hold a substantial ownership interest
- vii. "IGA" means Inter Governmental Agreement between the Governments of India and the USA to improve international tax compliance and to implement FATCA of the USA
- viii. "KYC Templates" means templates prepared to facilitate collating and reporting the KYC data to the CKYCR, for individuals and legal entities
- ix. "Non-face-to-face customers" means customers who open accounts without visiting the branch/offices of RAR Fincare Limited or meeting the officials of RAR Fincare Limited
- x. "On-going Due Diligence" means regular monitoring of transactions in accounts to ensure that they are consistent with the customers' profile and source of funds
- xi. "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 Reserve Bank
- xii. "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.
- xiii. "Wire transfer" means a transaction carried out, directly or through a chain of transfers, on behalf of an originator person (both natural and legal) through a bank by electronic means with a view to making an amount of money available to a beneficiary person at a bank
- xiv. "Domestic and cross-border wire transfer": When the originator bank and the beneficiary bank is the same person or different person located in the same country, such a transaction is a domestic wire transfer, and if the 'originator bank' or 'beneficiary bank' is in different countries such a transaction is cross-border wire transfer
- xv. All other expressions unless defined herein shall have the same meaning as have been assigned to them under the Banking Regulation Act, 1949, the Reserve Bank of India Act, 1935, the Prevention of Money Laundering Act, 2002, the Prevention of Money Laundering (Maintenance of Records) Rules, 2005, the 8Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 and regulations made thereunder and 'Aadhaar and other Laws (amendment) Ordinance, 2019', any statutory modification or re-enactment thereto or as used in commercial parlance, as the case may be.

General

As per RBI/DBR/2015-16/18 Master Direction DBR.AML.BC. No.81/14.01.001/2015-16, every NBFC should have KYC policy with the following four key elements: -

- a. Customer Acceptance Policy
- b. Risk Management
- c. Customer Identification Procedures (CIP)
- d. Monitoring of transactions

Designated Director

- a. A “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 be nominated by the Board
- b. The name, designation and address of the Designated Director shall be communicated to the FIU-IND
- c. In no case, the Principal Officer shall be nominated as the 'Designated Director'
- d. He/She must be the Managing Director or a whole-time Director, duly authorized by the Board of Director

Principal Officer

- a. The Principal Officer shall be responsible for ensuring compliance, monitoring transactions, and sharing and reporting information as required under the law/regulations
- b. The name, designation and address of the Principal Officer shall be communicated to the FIU-IND

Compliance of KYC Policy

- a. RAR FINCARE LIMITED shall ensure compliance with KYC Policy through:
 - I. Specifying as to who constitute ‘Senior Management’ for the purpose of KYC compliance
 - II. Allocation of responsibility for effective implementation of policies and procedures
 - III. Independent evaluation of the compliance functions of RAR Fincare Limited’s policies and procedures, including legal and regulatory requirements
 - IV. Concurrent/internal audit system to verify the compliance with KYC/AML policies and procedures
 - V. Submission of quarterly audit notes and compliance to the Audit Committee
- b. RAR Fincare Limited shall ensure that decision-making functions of determining compliance with KYC norms are not outsourced

Customer Acceptance Policy

- a. No account is to be opened in anonymous or fictitious/benami name(s)/entity(ies)
- b. No account is opened where RAR Fincare Limited 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
- c. CDD Procedure is followed for all the joint account holders, while opening a joint account
- d. No transaction or account-based relationship is undertaken without following the CDD procedure
- e. Necessary checks before opening a new account are to be ensured so 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, etc. For this purpose, the Company shall maintain lists of individuals or entities issued by RBI, United Nations Security Council, other regulatory & enforcement agencies, internal lists as the Company may decide from time to time. Full details of accounts/ customers bearing resemblance with any of the individuals/ entities in the list shall be treated as suspicious and reported

“ISIL (Da’esh) & Al-Qaida Sanctions List”

https://www.un.org/securitycouncil/sanctions/1267/aq_sanctions_list

“1988 Sanctions List”

<https://www.un.org/securitycouncil/sanctions/1988/materials>

Details of accounts resembling any of the individuals/entities in the lists shall be reported to FIU-IND apart from advising Ministry of Home Affairs as required under UAPA notification dated August 27, 2009.

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

- f. Classify customers into various risk categories and, based on risk perception, apply the acceptance criteria for each category of customers. Also, a profile of each customer will be prepared based on risk categorization
- g. Appropriate Enhanced Due Diligence (EDD) measures (refer **Customer Due Diligence Procedure, section 6**) shall be adopted for high risk customers from AML perspective, especially those for whom the sources of funds are not clear, transactions carried through correspondent accounts and customers who are Politically Exposed Persons (PEPs) and their family members/close relatives
- h. In respect of unusual or suspicious transactions/applications or when the customer moves from a low risk to a high-risk profile, appropriate EDD measures (refer **Customer Due Diligence Procedure, section 6**) shall be adopted.
- i. Not to open an account or close an existing account (except as provided in this Policy), where CDD measures as defined in this Policy could not be applied, due to non-cooperation of the customer or non-reliability of the data/ information furnished to RAR Fincare Limited. Suitable built-in safeguards shall be provided to avoid any harassment to Customers
- j. Implementation of CAP should not become too restrictive and result in denial of RAR Fincare Limited services to public, especially to those who are financially or socially disadvantaged
- k. The decision to open an account for Politically Exposed Person (PEP) should be taken at a senior level. 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
- l. Circumstances, in which a customer is permitted to act on behalf of another person/ entity shall be clearly spelt out
- m. The mandatory information to be sought for KYC purpose while opening an account and during the periodic updating, is specified
- n. Optional/additional information is obtained with the explicit consent of the customer after the account is opened
- o. RAR Fincare Limited shall apply the CDD procedure at the UCIC level. Thus, if an existing KYC compliant customer desires to open another account, there shall be no need for a fresh CDD exercise

- p. Suitable system is put in place to ensure that the identity of the Customer does not match with any person or entity, whose name appears in the sanctions lists circulated by Reserve Bank of India
- q. RAR Fincare Limited shall seek only such information from the customer which is relevant to the risk category and is not intrusive. Any other information from the customer should be sought separately with his/her consent and after opening the account

Customer Acceptance Policy shall not result in denial of banking/financial facility to members of the public, especially those, who are financially or socially disadvantaged.

Risk Management

For Risk Management, RAR Fincare Limited shall have a risk-based approach which includes the following: -

- a. Customers shall be categorized as **low, medium, high and Very High**-risk category, based on the assessment and risk perception of the RE
- b. Risk categorization shall be undertaken based on parameters such as customer's identity, social/financial status, nature of business activity, and information about the clients' business and their location etc. While considering customer's identity, the ability to confirm identity documents through online or other services offered by issuing authorities may also be factored in

Provided that various other information collected from different categories of customers relating to the perceived risk, is non-intrusive and the same is specified in the KYC policy.

Customer Identification Procedure (CIP)

RAR Fincare Limited shall undertake identification of customers in the following cases:

- a. Commencement of an account-based relationship with the customer
- b. Carrying out any international money transfer operations for a person who is not an account holder of the bank
- c. When there is a doubt about the authenticity or adequacy of the customer identification data it has obtained
- d. Selling third party products as agents, selling their own products, payment of dues of credit cards/sale and reloading of prepaid/travel cards and any other product for more than rupees fifty thousand
- e. Carrying out transactions for a non-account-based customer, that is a walk-in customer, where the amount involved is equal to or exceeds rupees fifty thousand, whether conducted as a single transaction or several transactions that appear to be connected
- f. When RAR Fincare Limited has reason to believe that a customer (account- based or walk-in) is intentionally structuring a transaction into a series of transactions below the threshold of rupees fifty thousand

To verify the identity of customers at the time of commencement of an account-based relationship, RAR Fincare Limited, shall at its option, rely on customer due diligence done by a third party, subject to the following conditions:

- a. Records or the information of the customer due diligence carried out by the third party is obtained within two days from the third party or from the Central KYC Records Registry
- b. Adequate steps are taken by RAR Fincare Limited to satisfy themselves that copies of identification data and other relevant documentation relating to the customer due diligence requirements shall be made available from the third party upon request without delay
- c. The third party is regulated, supervised or monitored for, and has measures in place for, compliance with customer due diligence and record-keeping requirements in line with the requirements and obligations under the PML Act
- d. The third party shall not be based in a country or jurisdiction assessed as high risk
- e. The ultimate responsibility for customer due diligence and undertaking enhanced due diligence measures, as applicable, will be with RAR Fincare Limited. Enhanced Due diligence measures are indicated in **Section 6, Customer Due Diligence Procedure**

Periodic Updation

Periodic updating shall be carried out at least once in every two years for high risk customers, once in every eight years for medium risk customers and once in every ten years for low risk customers as per the following procedure:

- a. RAR Fincare Limited shall carry out
 - I. PAN verification from the verification facility available with the issuing authority and
 - II. Authentication, of Aadhaar Number already available with RAR Fincare Limited with the explicit consent of the customer in applicable cases
 - III. In case identification information available with Aadhaar does not contain current address an OVD containing current address may be obtained
 - IV. Certified copy of OVD containing identity and address shall be obtained at the time of periodic updating from individuals not eligible to obtain Aadhaar, except from individuals who are categorized as 'low risk'. In case of low risk customers when there is no change in status with respect to their identities and addresses, a self-certification to that effect shall be obtained
 - V. In case of Legal entities, RAR Fincare Limited shall review the documents sought at the time of opening of account and obtain fresh certified copies
- b. RAR Fincare Limited may not insist on the physical presence of the customer for the purpose of furnishing OVD or furnishing consent for Aadhaar authentication unless there are sufficient reasons that physical presence of the account holder/holders is required to establish their bonafides. Normally, OVD/Consent forwarded by the customer through mail/post, etc., shall be acceptable
- c. RAR Fincare Limited shall ensure to provide acknowledgment with date of having performed KYC updating
- d. The time limits prescribed above would apply from the date of opening of the account/ last verification of KYC

Customer Due Diligence Procedure (CDD)

Section 1: CDD Procedure in case of Individuals

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

- A certified copy of any OVD containing details of his identity and address
- One recent photograph
- The Permanent Account Number or Form No. 60 as defined in Income-tax Rules, 1962, and
- Such other documents pertaining to the nature of business or financial status as required by RAR Fincare Limited

RAR Fincare Limited may carry out offline verification of a customer if he is desirous of undergoing Aadhaar offline verification for identification purpose.

In cases where successful authentication has been carried out, other OVD and photograph need not be submitted by the customer.

Provided further that in case biometric e-KYC authentication cannot be performed for an individual desirous of receiving any benefit or subsidy under any scheme notified under section 7 of the Aadhaar (Targeted Delivery of Financial and Other subsidies, Benefits and Services) Act, 2016 owing to injury, illness or infirmity on account of old age or otherwise, and similar causes, RAR Fincare Limited shall, apart from obtaining the Aadhaar number, perform identification preferably by carrying out offline verification or alternatively by obtaining the certified copy of any other OVD from the customer. CDD done in this manner shall invariably be carried out by an official of RAR Fincare Limited and such exception handling shall also be a part of the concurrent audits. RAR Fincare Limited shall ensure to duly record the cases of exception handling in a centralized exception database. The database shall contain the details of grounds of granting exception, customer details, name of the designated official authorizing the exception and additional details, if any. The database shall be subjected to periodic internal audit/inspection by RAR Fincare Limited and shall be available for supervisory review.

Explanation 1: RAR FINCARE LIMITED shall, where its customer submits his Aadhaar number, ensure such customer to redact or blackout his Aadhaar number through appropriate means where the authentication of Aadhaar number is not required under section 7 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies Benefits and Services) Act.

Explanation 2: Biometric based e-KYC authentication can be done by RAR Fincare Limited officials/business correspondents/business facilitators.

Explanation 3: The use of Aadhaar, proof of possession of Aadhaar etc., shall be in accordance with the Aadhaar (Targeted Delivery of Financial and Other Subsidies Benefits and Services) Act, the Aadhaar and Other Law (Amendment) Ordinance, 2019 and the regulations made thereunder.

Accounts opened using OTP based e-KYC, in non-face-to-face mode are subject to the following conditions:

- There must be a specific consent from the customer for authentication through OTP
- As regards borrowed accounts, only term loans shall be sanctioned. The aggregate amount of term loans sanctioned shall not exceed rupees sixty thousand in a year

- Borrowed accounts, opened using OTP based e-KYC shall not be allowed for more than one year within which identification as per Section 1 is to be carried out
- If the CDD procedure as mentioned above is not completed within a year, no further debits shall be allowed
- 12A declaration shall be obtained from the customer to the effect that no other account has been opened nor will be opened using OTP based KYC in non-face-to-face mode with any other REs. Further, while uploading KYC information to CKYCR, RAR Fincare Limited shall clearly indicate that such accounts are opened using OTP based e-KYC and other REs shall not open accounts based on the KYC information of accounts opened with OTP based e-KYC procedure in non-face-to-face mode.
- RAR Fincare Limited shall have strict monitoring procedures including systems to generate alerts in case of any non-compliance/violation, to ensure compliance with the above-mentioned conditions.

Simplified procedure for opening accounts: In case a person who desires to open an account is not able to produce any of the OVDs, RAR Fincare Limited may at its discretion open accounts subject to the following conditions:

- a. A self-attested photograph from the customer shall be obtained
- b. The designated officer of RAR Fincare Limited certifies under his signature that the person opening the account has affixed his signature or thumb impression in his presence
- c. The account shall remain operational initially for a period of twelve months, within which CDD as per Section 1 shall be carried out

KYC verification once done by one branch/office of RAR Fincare Limited shall be valid for transfer of the account to any other branch/office of RAR Fincare Limited, provided full KYC verification has already been done for the concerned account and the same is not due for periodic updating.

Section 2: CDD Measures for Sole Proprietary firms

For opening an account in the name of a sole proprietary firm, CDD of the individual (proprietor) shall be carried out.

In addition to the above, any two of the following documents as a proof of business/ activity in the name of the proprietary firm shall also be obtained:

- a. Registration certificate
- b. Certificate/license issued by the municipal authorities under Shop and Establishment Act
- c. Sales and income tax returns
- d. CST/VAT/ GST certificate (provisional/final)
- e. Certificate/registration document issued by Sales Tax/Service Tax/Professional Tax authorities
- f. IEC (Importer Exporter Code) issued to the proprietary concern by the office of DGFT or license/certificate of practice issued in the name of the proprietary concern by any professional body incorporated under a statute

- g. Complete Income Tax Return (not just the acknowledgement) in the name of the sole proprietor where the firm's income is reflected, duly authenticated/acknowledged by the Income Tax authorities
- a. Utility bills such as electricity, water, landline telephone bills, etc.

In cases where RAR Fincare Limited is satisfied that it is not possible to furnish two such documents, RAR Fincare Limited may, at its discretion, accept only one of those documents as proof of business/activity.

Provided RAR Fincare Limited undertake contact point verification and collect such other information and clarification as would be required to establish the existence of such firm and shall confirm and satisfy itself that the business activity has been verified from the address of the proprietary concern.

Section 3: CDD Measures for Sole Legal Entities

For opening an account of a company, certified copies of each of the following documents shall be obtained:

- a. Certificate of incorporation
- b. Memorandum and Articles of Association
- c. Permanent Account Number of the company
- d. A resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf
- e. Documents, as specified in Section 1, of the managers, officers, or employees holding an attorney to transact on the company's behalf

For opening an account of a partnership firm, the certified copies of each of the following documents shall be obtained:

- a. Registration certificate
- b. Partnership deed
- c. Permanent Account Number of the partnership firm
- d. Documents, as specified in Section 1, of the person holding an attorney to transact on its behalf

For opening an account of a trust, certified copies of each of the following documents shall be obtained:

- a) Registration certificate
- b) Trust deed
- c) Permanent Account Number or Form No.60 of the trust
- d) Documents, as specified in Section 1, of the person holding an attorney to transact on its behalf

For opening an account of an unincorporated association or a body of individuals, certified copies of each of the following documents shall be obtained:

- a) Resolution of the managing body of such association or body of individuals
- b) Permanent Account Number or Form No. 60 of the unincorporated association or a body of individuals
- c) Power of attorney granted to transact on its behalf

- d) Documents, as specified in Section 1, of the person holding an attorney to transact on its behalf and
- e) Such information as may be required by RAR Fincare Limited to collectively establish the legal existence of such an association or body of individuals

Explanation: Unregistered trusts/partnership firms shall be included under the term 'unincorporated association'.

Explanation: Term 'body of individuals' includes societies

For opening accounts of juridical persons not specifically covered in the earlier part, such as Government or its Departments, societies, universities and local bodies like village panchayats, certified copies of the following documents shall be obtained:

- a) Document showing name of the person authorized to act on behalf of the entity
- b) Documents, as specified in Section 1, of the person holding an attorney to transact on its behalf and
- c) Such documents as may be required by RAR Fincare Limited to establish the legal existence of such an entity/juridical person.

Section 4: Identification of Beneficial Owner

For opening an account of a Legal Person who is not a natural person, the beneficial owner(s) shall be identified and all reasonable steps in terms of Rule 9(3) of the PML Rules 2005 to verify his/her identity shall be undertaken keeping in view the following:

- a) Where the customer or the owner of the controlling interest is a company listed on a stock exchange, or is a subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies
- b) In cases of trust/nominee or fiduciary accounts whether the customer is acting on behalf of another person as trustee/nominee or any other intermediary is determined. In such cases, satisfactory evidence of the identity of the intermediaries and of the persons on whose behalf they are acting, as also details of the nature of the trust or other arrangements in place shall be obtained

Section 5: On-going Due Diligence

RAR FINCARE LIMITED shall undertake on-going due diligence of customers to ensure that their transactions are consistent with their knowledge about the customers, customers' business, and risk profile.

The extent of monitoring shall be aligned with the risk category of the customer.

Explanation: High risk accounts must be subjected to more intensified monitoring.

- a. A system of periodic 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 shall be put in place

- b. The transactions in accounts of marketing firms, especially accounts of Multi-level Marketing (MLM) Companies shall be closely monitored

Periodic Updation

Periodic updating shall be carried out at least once in every two years for high-risk customers, once in every eight years for medium risk customers and once in every ten years for low-risk customers as per the following procedure:

- a. RAR Fincare Limited shall carry out
 - i. CDD, as specified in Section 1, at the time of periodic updating. However, in case of low risk customers when there is no change in status with respect to their identities and addresses, a self-certification to that effect shall be obtained
 - ii. In case of Legal entities, RAR Fincare Limited shall review the documents sought at the time of opening of account and obtain fresh certified copies
- b. RAR Fincare Limited may not insist on the physical presence of the customer for the purpose of furnishing OVD or furnishing consent for Aadhaar authentication/Offline Verification unless there are sufficient reasons that physical presence of the account holder/holders is required to establish their bona-fides. Normally, OVD/Consent forwarded by the customer through mail/post, etc., shall be acceptable
- c. RAR Fincare Limited shall ensure to provide acknowledgment with date of having performed KYC updating
- d. The time limits prescribed above would apply from the date of opening of the account/ last verification of KYC

In case of existing customers, RAR Fincare Limited shall obtain the Permanent Account Number or Form No.60, by such date as may be notified by the Central Government, failing which RAR Fincare Limited shall temporarily cease operations in the account till the time the Permanent Account Number or Form No. 60 is submitted by the customer.

Provided that before temporarily ceasing operations for an account, RAR Fincare Limited shall give the client an accessible notice and a reasonable opportunity to be heard. RAR Fincare Limited shall include appropriate relaxation(s) for continued operation of accounts for customers who are unable to provide Permanent Account Number or Form No. 60 owing to injury, illness, or infirmity on account of old age or otherwise, and such like causes. Such accounts shall, however, be subject to enhanced monitoring.

Provided further that if a customer having an existing account-based relationship with RAR Fincare Limited gives in writing to the RAR Fincare Limited that he/she does not want to submit his Permanent Account Number or Form No.60, RAR Fincare Limited shall close the account and all obligations due in relation to the account shall be appropriately settled after establishing the identity of the customer by obtaining the identification documents as applicable to the customer.

Explanation – For the purpose of this Section, “temporary ceasing of operations” in relation an account shall mean the temporary suspension of all transactions or activities in relation to that account by RAR Fincare Limited till such time the customer complies with the provisions of this Section. In case of asset accounts such as loan accounts, for the purpose of ceasing the operation in the account, only credits shall be allowed.

Section 6: Enhanced Due Diligence Procedure

Accounts of non-face-to-face customers:

RAR Fincare Limited shall ensure that the first payment is to be affected through the customer's KYC-complied account with another Regulated Entity, for enhanced due diligence of non-face to face customers.

Accounts of Politically Exposed Persons (PEPs)

- A. RAR Fincare Limited shall have the option of establishing a relationship with PEPs provided that:
 - a. Sufficient information including information about the sources of funds accounts of family members and close relatives is gathered on the PEP
 - 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 taken at a senior level in accordance with the RAR Fincare Limited's Customer Acceptance 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, senior management's approval is obtained to continue the business relationship
 - f. The CDD measures as applicable to PEPs including enhanced monitoring on an on-going basis are applicable
- B. These instructions shall also be applicable to accounts where a PEP is the beneficial owner

Client accounts opened by professional intermediaries:

RAR FINCARE LIMITED shall ensure while opening client accounts through professional intermediaries, that:

- a. Clients shall be identified when client account is opened by a professional intermediary on behalf of a single client
- b. RAR Fincare Limited shall not open accounts of such professional intermediaries who are bound by any client confidentiality that prohibits disclosure of the client details to RAR Fincare Limited
- c. All the beneficial owners shall be identified where funds held by the intermediaries are not co-mingled at the level of RAR Fincare Limited, and there are 'sub-accounts', each of them attributable to a beneficial owner, or where such funds are co-mingled at the level of RAR Fincare Limited, it shall look for the beneficial owners
- d. RAR Fincare Limited shall, at their discretion, rely on the 'customer due diligence' (CDD) done by an intermediary, provided that the intermediary is a regulated and supervised entity and has adequate systems in place to comply with the KYC requirements of the customers
- e. The ultimate responsibility for knowing the customer lies with RAR Fincare Limited

Section 7: Simplified Due Diligence

Simplified norms for Self Help Groups (SHGs)

- a. CDD of all the members of SHG shall not be required while opening the savings bank account of the SHG.
- b. CDD of all the office bearers shall suffice.

- c. No separate CDD as per the CDD procedure mentioned in Section 1 of the MD of the members or office bearers shall be necessary at the time of credit linking of SHGs

Simplified KYC norms for Foreign Portfolio Investors (FPIs)

Accounts of FPIs which are eligible/ registered as per SEBI guidelines, for the purpose of investment under Portfolio Investment Scheme (PIS), shall be opened by accepting KYC documents subject to Income Tax (FATCA/CRS) Rules.

Provided that RAR Fincare Limited shall obtain undertaking from FPIs or the Global Custodian acting on behalf of the FPI that as and when required, the exempted documents as detailed will be submitted.

Section 8: Principal Officer

The Company shall appoint a Senior Management Officer to be designated as Principal Officer (PO) and the role and responsibilities of the PO have been detailed therein. With a view to enable the PO to discharge his responsibilities, the PO and other appropriate staff should have timely access to customer identification data and other CDD information, transaction records and other relevant information. Further, the Company shall ensure that the PO is able to act independently and report directly to the Senior Management or to the Board of Directors. The role and responsibilities of the PO should include overseeing and ensuring overall compliance with regulatory guidelines on KYC/AML/CFT issued from time to time and obligations under the Prevention of Money Laundering Act, 2002, rules and regulations made thereunder, as amended from time to time. The PO for the Company is Mr. Venkatasubramanian Ramanathan

Monitoring of Transactions

As per Income Tax Act, 1961, Cash cannot be accepted by any person (Branch / collection staff) over and above Rs. 2,00,000/- (Two Lacs only) for a particular transaction or series of integrally connected transactions. The Company does not accept cash deposits in foreign currency.

As per Income Tax Act, 1961, for any Cash or its equivalent payment over and above Rs. 10,000/-, a 'source of funds' declaration for such cash should be obtained from the Customer / person depositing / repaying the loan.

Note: Source of funds in cash is through 'sale of immovable property', then Cash or its equivalent for more than Rs. 20,000/- should not be accepted.

Ongoing monitoring is an essential element of effective KYC procedures. Monitoring of transactions and its extent will be conducted taking into consideration the risk profile and risk sensitivity of the account. RAR Fincare Limited shall make endeavors to understand the normal and reasonable activity of the customer so that the transactions that fall outside the regular/pattern of activity can be identified,

Special attention will be paid to all complex, unusually large transactions and all unusual patterns, which have no apparent economic or visible lawful purpose. RAR Fincare Limited may prescribe threshold limits for a particular category of accounts and pay particular attention to the transactions which exceed these limits. Transactions that involve cash over and above Rs. 1 lac should particularly attract the attention of RAR Fincare Limited. Higher risk accounts shall be subjected to intense monitoring.

RAR Fincare Limited shall set key indicators for such account's basis the background of the customer, country of origin, sources of funds, the type of transactions involved and other risk factors which shall determine the extent of monitoring. RAR Fincare Limited shall carry out the periodic review of risk categorization of transactions/customer's accounts and the need for applying enhanced due diligence measures at a periodicity of not less than once in six (6) months. RAR Fincare Limited shall explore the possibility of validating the new account opening applications with various watch lists available in public domain, including RBI watch list.

Record Management

The following steps shall be taken regarding maintenance, preservation and reporting of customer account information, with reference to provisions of PML Act and Rules. RAR Fincare Limited shall,

- a) Maintain all necessary records of transactions between the company and the customer, both domestic and international, for at least five years from the date of transaction
- b) 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 five years after the business relationship is ended
- c) Make available the identification records and transaction data to the competent authorities upon request
- d) Introduce a system of maintaining proper record of transactions prescribed under Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005 (PML Rules, 2005)
- e) Maintain all necessary information in respect of transactions prescribed under PML Rule 3 to permit reconstruction of individual transaction, including the following:
 - i. The nature of the transactions
 - ii. The amount of the transaction and the currency in which it was denominated
 - iii. The date on which the transaction was conducted; and
 - iv. The parties to the transaction
- f) Evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities
- g) Maintain records of the identity and address of their customer, and records in respect of transactions referred to in Rule 3 in hard or soft format

Reporting Requirements to Financial Intelligence Unit – India

RAR FINCARE LIMITED shall furnish to the Director, Financial Intelligence Unit-India (FIU-IND), information referred to in Rule 3 of the PML (Maintenance of Records) Rules, 2005 in terms of Rule 7 thereof.

Explanation: In terms of Third Amendment Rules notified September 22, 2015 regarding amendment to sub rule 3 and 4 of rule 7, Director, FIU-IND shall have powers to issue guidelines to the Regulated Entities for detecting transactions referred to in various clauses of sub-rule (1) of rule 3, to direct them about the form of furnishing information and to specify the procedure and the manner of furnishing information.

The reporting formats and comprehensive reporting format guide, prescribed/ released by FIU-IND and Report Generation Utility and Report Validation Utility developed to assist reporting entities in the preparation of prescribed reports shall be taken note of. The editable electronic utilities to file electronic Cash Transaction Reports (CTR) / Suspicious Transaction Reports (STR) which FIU-IND has placed on its website shall be made use of if RAR Fincare Limited doesn't have suitable technological tools for extracting CTR/STR from company's live transaction data.

While furnishing information to the Director, FIU-IND, delay of each day in not reporting a transaction or delay of each day in rectifying a misrepresented transaction beyond the time limit as specified in the Rule shall be constituted as a separate violation. RAR Fincare Limited shall not put any restriction on operations in the accounts where an STR has been filed. RAR Fincare Limited shall keep the fact of furnishing of STR strictly confidential. It shall be ensured that there is no tipping off to the customer at any level.

Robust software, throwing alerts when the transactions are inconsistent with risk categorization and updated profile of the customers shall be put in to use as a part of effective identification and reporting of suspicious transactions.

Requirements/obligations under International Agreements

RAR FINCARE LIMITED shall ensure that in terms of Section 51A of the Unlawful Activities (Prevention) (UAPA) Act, 1967, they do not have any account in the name of individuals/entities appearing in the lists of individuals and entities, suspected of having terrorist links, which are approved by and periodically circulated by the United Nations Security Council (UNSC). The details of the two lists are as under:

- a) The "ISIL (Da'esh) & Al-Qaida Sanctions List", which includes names of individuals and entities associated with the Al-Qaida. The updated ISIL & Al-Qaida Sanctions List is available at <https://scsanctions.un.org/fop/fop?xml=htdocs/resources/xml/en/consolidated.xml&xslt=htdocs/resources/xsl/en/al-qaida-r.xsl>
- b) The "1988 Sanctions List", consisting of individuals (Section A of the consolidated list) and entities (Section B) associated with the Taliban which is available at <https://scsanctions.un.org/fop/fop?xml=htdocs/resources/xml/en/consolidated.xml&xslt=htdocs/resources/xsl/en/taliban-r.xsl>

Details of accounts resembling any of the individuals/entities in the lists shall be reported to FIU-IND apart from advising Ministry of Home Affairs as required under UAPA notification dated August 27, 2009.

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

Freezing of Assets under Section 51A of Unlawful Activities (Prevention) Act, 1967

The procedure laid down in the UAPA Order dated August 27, 2009 shall be strictly followed and meticulous compliance with the Order issued by the Government shall be ensured.

Jurisdictions that do not or insufficiently apply the FATF Recommendations

- a) FATF Statements circulated by Reserve Bank of India from time to time, and publicly available information, for identifying countries, which do not or insufficiently apply the FATF Recommendations, shall be considered. Risks arising from the deficiencies in AML/CFT regime of the jurisdictions included in the FATF Statement shall be considered
- b) Special attention shall be given to business relationships and transactions with persons (including legal persons and other financial institutions) from or in countries that do not or insufficiently apply the FATF Recommendations and jurisdictions included in FATF Statements
- c) The background and purpose of transactions with persons (including legal persons and other financial institutions) from jurisdictions included in FATF Statements and countries that do not or insufficiently apply the FATF Recommendations shall be examined, and written findings together with all documents shall be retained and shall be made available to Reserve Bank/other relevant authorities, on request

Other Instructions

Secrecy Obligations and Sharing Information

RAR Fincare Limited shall maintain confidentiality of information as provided in Section 45NB of RBI Act 1934.

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

RAR Fincare Limited shall capture the KYC information for sharing with the CKYCR in the manner mentioned in the Rules, as required by the revised KYC templates prepared for 'individuals' and 'Legal Entities' as the case may be. Government of India has authorized the Central Registry of Securitization Asset Reconstruction and Security Interest of India (CERSAI), to act as, and to perform the functions of the CKYCR vide Gazette Notification No. S.O. 3183(E) dated November 26, 2015.

The 'live run' of the CKYCR started with effect from July 15, 2016 in phased manner beginning with new 'individual accounts'. Accordingly, RAR Fincare Limited shall take the following steps:

- i. The company shall upload the KYC data pertaining to all new individual accounts opened on or after from April 1, 2017 with CERSAI in terms of the provisions of the Prevention of Money Laundering (Maintenance of Records) Rules, 2005
- ii. Operational Guidelines (version 1.1) for uploading the KYC data have been released by CERSAI. Further, 'Test Environment' has also been made available by CERSAI for the use of Res

Reporting requirement under Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standards (CRS)

Under FATCA and CRS, REs shall adhere to the provisions of Income Tax Rules 114F, 114G and 114H.

RAR Fincare Limited shall take following steps for complying with the reporting requirements: -

- a) Register on the related e-filing portal of Income Tax Department as Reporting Financial Institutions at the link <https://incometaxindiaefiling.gov.in/> post login -> My Account --> Register as Reporting Financial Institution
- b) Submit online reports by using the digital signature of the 'Designated Director' by either uploading the Form 61B or 'NIL' report, for which, the schema prepared by Central Board of Direct Taxes (CBDT) shall be referred to
Explanation: RAR Fincare Limited shall refer to the spot reference rates published by Foreign Exchange Dealers' Association of India (FEDAI) on their website at <http://www.fedai.org.in/RevaluationRates.aspx> for carrying out the due diligence procedure for the purposes of identifying reportable accounts in terms of Rule 114H
- c) Develop Information Technology (IT) framework for carrying out due diligence procedure and for recording and maintaining the same, as provided in Rule 114H
- d) Develop a system of audit for the IT framework and compliance with Rules 114F, 114G and 114H of Income Tax Rules
- e) Constitute a "High Level Monitoring Committee" under the Designated Director or any other equivalent functionary to ensure compliance
- f) Ensure compliance with updated instructions/ rules/ guidance notes/ Press releases/ issued on the subject by Central Board of Direct Taxes (CBDT) from time to time and available on the web site <http://www.incometaxindia.gov.in/Pages/default.aspx>. RAR Fincare Limited may take note of the following:
 - a. Updated Guidance Note on FATCA and CRS
 - b. A press release on 'Closure of Financial Accounts' under Rule 114H (8)

Collection of Account Payee Cheques

Account payee cheques for any person other than the payee constituent shall not be collected.

- a) A Unique Customer Identification Code (UCIC) shall be allotted while entering new relationships with individual customers as also the existing customers
- b) RAR Fincare Limited shall not issue UCIC to all walk-in/occasional customers such as buyers of pre-paid instruments/purchasers of third-party products provided it is ensured that there is adequate mechanism to identify such walk-in customers who have frequent transactions with the company and ensure that they are allotted UCIC

Introduction of New Technologies –Smart Cards/Gift Cards/Mobile Wallet/ Net Banking/ Mobile Banking etc.

Adequate attention shall be paid by RAR Fincare Limited to any money-laundering and financing of terrorism threats that may arise from new or developing technologies and it shall be ensured that appropriate KYC procedures issued from time to time are duly applied before introducing new products/services/technologies.

Wire Transfer

RAR Fincare Limited shall ensure the following while effecting wire transfer:

- a) All cross-border wire transfers including transactions using credit or debit card shall be accompanied by accurate and meaningful originator information such as name, address and account number or a unique reference number, as prevalent in the country concerned in the absence of account. Exception: Interbank transfers and settlements where both the originator and beneficiary are banks or financial institutions shall be exempt from the above requirements
- b) Domestic wire transfers of rupees fifty thousand and above shall be accompanied by originator information such as name, address and account number
- c) Customer Identification shall be made if a customer is intentionally structuring wire transfer below rupees fifty thousand to avoid reporting or monitoring. In case of non-cooperation from the customer, efforts shall be made to establish his identity and STR shall be made to FIU-IND
- d) Complete originator information relating to qualifying wire transfers shall be preserved at least for a period of five years
- e) RAR Fincare Limited, if acts as an intermediary element of a chain of wire transfers, shall ensure that all originator information accompanying a wire transfer is retained with the transfer
- f) If RAR Fincare Limited is receiving intermediary financial institution, it shall transfer full originator information accompanying a cross-border wire transfer and preserve the same for at least five years if the same cannot be sent with a related domestic wire transfer, due to technical limitations
- g) All the information on the originator of wire transfers shall be immediately made available to appropriate law enforcement and/or prosecutorial authorities on receiving such requests
- h) Effective risk-based procedures to identify wire transfers lacking complete originator information shall be in place
- i) RAR Fincare Limited, if beneficiary financial institution, shall report transaction lacking complete originator information to FIU-IND as a suspicious transaction
- j) RAR Fincare Limited, if beneficiary financial institution, shall seek detailed information of the fund remitter with the ordering bank and if the ordering bank fails to furnish information on the remitter, the beneficiary shall consider restricting or terminating its business relationship with the ordering bank

Issue and Payment of Demand Drafts, etc.

Any remittance of funds by way of demand draft, mail/telegraphic transfer/NEFT/IMPS or any other mode and issue of travelers' cheques for value of rupees fifty thousand and above shall be effected by debit to the customer's account or against cheques and not against cash payment.

Quoting of PAN

Permanent account number (PAN) of customers shall be obtained and verified while undertaking transactions as per the provisions of Income Tax Rule 114B applicable to banking companies, as amended from time to time. Form 60 shall be obtained from persons who do not have PAN.

Selling Third Party Products

RAR Fincare Limited acting as agents while selling third party products as per regulations in force from time to time shall comply with the following aspects for the purpose of these directions:

- a) The identity and address of the walk-in customer shall be verified for transactions above rupees fifty thousand as required under “Customer Identification Procedure” of this policy
- b) Transaction details of sale of third-party products and related records shall be maintained as prescribed in “Record Management” of this policy
- c) AML software capable of capturing, generating, and analyzing alerts for the purpose of filing CTR/STR in respect of transactions relating to third party products with customers including walk-in customers shall be available
- d) Transactions involving rupees fifty thousand and above shall be undertaken only by:
 - Debit to customers’ account or against cheques; and
 - Obtaining and verifying the PAN given by the account based as well as walk-in customers

Hiring of Employees and Employee training

- a) Adequate screening mechanism as an integral part of their personnel recruitment/hiring process shall be put in place
- b) On-going employee training programme shall be put in place so that the members of staff are adequately trained in AML/CFT policy. The focus of the training shall be different for frontline staff, compliance staff and staff dealing with new customers. The front desk staff shall be specially trained to handle issues arising from lack of customer education. Proper staffing of the audit function with persons adequately trained and well-versed in AML/CFT policies of the company, regulation and related issues shall be ensured

Adherence to Know Your Customer (KYC) guidelines by RAR Fincare Limited and persons authorized by RAR Fincare Limited including brokers/agents etc.

- a) Persons authorized by the company for collecting loan repayments and their brokers/agents or the like, shall be fully compliant with the KYC guidelines applicable to the company
- b) All information shall be made available to the Reserve Bank of India to verify the compliance with the KYC guidelines and accept full consequences of any violation by the persons authorized by the company including brokers/agents etc. who are operating on their behalf
- c) The books of accounts of persons authorized by the company including brokers/agents or the like, so far as they relate to brokerage functions of the company, shall be made available for audit and inspection whenever required.

REVIEW

The Policy shall be reviewed by the Board as and when any Regulatory changes are issued by the Reserve Bank of India