



**POLICY ON
KNOW YOUR CUSTOMER & ANTI-MONEY LAUNDERING
MEASURES**

Version Tracker			
Particulars	Date	Approved by	Version
Policy approved on	November 22, 2019	Board	Version 1.0
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Housing Finance Companies (HFCs) are advised to follow certain customer identification procedure and monitoring of suspicious transactions for reporting to the appropriate authority. Further, NHB also advised the HFCs to put in place a proper policy frame work on KYC & AML duly approved by their Board of Directors. These guidelines of NHB advise HFCs to follow certain Customer Identification Procedure and monitoring transactions of a suspicious nature for the purpose of reporting it to the appropriate authority.

This Know Your Customer (KYC) policy of Aham Housing Finance Private Limited (AHFL) has been prepared in accordance with NHB and Anti Money Laundering and Combating Financing of Terrorism Standards. This policy also takes into account the provisions of Prevention of Money laundering.

This Policy only supplements the existing RBI, NHB guidelines relating to KYC / AML and any subsequent guidelines would be implemented immediately.

1) KYC/ AML philosophy of AHFL

- a) The KYC /AML philosophy of AHFL is to prevent the Company from being used, intentionally or unintentionally, by criminal elements for money laundering or terrorist financing activities. The objective of this policy is also to enable the Company to know / understand its customers and their financial dealings better which in turn will help the Company to manage its risks prudently.
- b) It is important that the Company's management views "money-laundering prevention" and "knowing your customer" as part of the risk management strategies and not simply as standalone requirements that are being imposed by legislation / regulators.

2) Money Laundering

- a) Money laundering is the criminal practise of putting ill – gotten gains or dirty money through a series of transactions, so that the funds are cleaned to look like proceeds from legal activities. It is driven by criminal activities and conceals the true source, ownership, or use of funds.
- b) In simple terms money laundering is most often described as the "turning of dirty or black money into clean or white money". If undertaken successfully, money laundering allows criminals to legitimize "dirty" money by mingling it with "clean" money, ultimately providing alegitimate cover for the source of their income.

3) Definitions:

For the purpose of KYC, a customer is defined as

- a) a person or entity (having the same meaning as defined in the Act) that has a loan and/or has a business/financial transaction/relationship with the Company and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting;

- b) beneficiaries of transactions conducted by professional intermediaries, such as Stock Brokers, Chartered Accountants, Solicitors, etc. as permitted under the law, and
- c) any person or entity connected with a financial transaction which can pose significant reputational or other risks to the Company

4) Know Your Customer

- a) One of the best methods of preventing and deterring money laundering is a sound knowledge of a customer's business and pattern of financial transactions. The adoption of procedures by which Company "know their customer" is not only a principle of good business but is also an essential tool to avoid involvement in money laundering.
- b) The Company shall adopt appropriate KYC procedures and internal controls measures to:
 - i) Determine and document the true identity of the customers who establish relationships, open accounts or conduct significant business transactions and obtain basic background information on customers.
 - ii) Assess the money laundering risk posed by customers' expected use of Company's products and services
 - iii) Protect the Company from the risks of doing business with any individual or entity whose identity cannot be determined or who refuses to provide information, or who have provided information that contains significant inconsistencies which cannot be resolved after due investigation.

5) Customer Identification Procedure & Acceptance Policy:

Customer identification means identifying the customer and verifying his/ her identity by using reliable, independent source documents, data or information while establishing a relationship. The Company will obtain relevant documents to prove the applicant's identity, place of residence, age etc. which are necessary to establish identity and contact ability of each new customer.

The company will ensure that all/any documents as listed in Annexure – I are obtained from prospective customers in order to carry out the necessary due diligence for granting a loan.

As per the internal classification, for low and medium risk customers, the company will, either through its own officers or appointed agencies carry out verification of originals, place of residence etc. as well as take signature verification wherever necessary. In addition to this, the company's officers will do a personal discussion with the customer at his residence/office in order to interact with other family /

workplace members which will also help ascertain the genuineness of the prospective customer.

Company will undertake identification of customers in the following cases: -

- a. Commencement of an account-based relationship with customer.
- b. When there is doubt about the authenticity or adequacy of the customer identification data it has obtained.

For the purpose of verifying the identity of customers at the time of commencement of an account-based relationship, the Company shall at its option, rely on CDD 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) Where the Company is satisfied 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 Prevention of Money-Laundering Act
- d) The third party shall not be based in a country or jurisdiction assessed as high risk.

However, the ultimate responsibility for CDD, including done by a third party and undertaking enhanced due diligence measures, as applicable, shall rest with the Company.

Apart from this, the following guidelines will be followed while dealing with specific clients:

Trust/Nominee or Fiduciary Accounts

Company shall attempt to determine whether the customer is acting on behalf of another person as trustee/nominee or any other intermediary. If so, Company will insist on receipt of satisfactory evidence of the identity of the intermediaries and of the persons on whose behalf they are acting.

Accounts of companies and firms

Company shall attempt to verify the legal status of the legal person/ entity through proper and relevant documents. Company shall attempt to verify that any person, who purports to act on behalf of the legal / juridical person/entity, is so authorized and in what capacity that person is authorized and further verify the identity of that person.

Customer Due Diligence (CDD) procedure in case of individuals

The company will obtain following information from an individual customer while establishing relationship with an individual or dealing with the individual who is beneficial owner, authorised signatory, or the power of attorney holder related to any legal entity.

- a) the Aadhar Number (copy to be certified by the company's official and recorded) where he is desirous of receiving any benefit or subsidy under any Scheme notified under Section 7 of the Aadhar Act or certified copy of the Officially Valid Document (OVD), set out in list enumerated in Annexure-I, containing details of the identity and address, and one recent photograph.
- b) the Permanent Account Number (PAN) or Form 60 as defined in I.T.Rules 1962, as amended from time to time. The company will inform the customer about this provision while opening the account.
- c) In case of the existing customer, the company will obtain PAN or Form No. 60 as the case may be, on such date as may be notified by the Central Govt.
- d) In case, the OVD furnished by the Customer does not contain the updated address, the company will obtain the following documents for limited purpose of proof of address.

- a. Utility bill (electricity, telephone, piped gas, water bill, postpaid mobile phone) which is not more than Two Months old of any service provider.
- b. Property or municipal tax receipt.
- c. Pension or family pension payment order issued by Govt departments or Public Sector Undertaking, if they contain the address.
- d. Letter of allotment of accommodation from employer issued by Central/state Governments, state or regulatory bodies, PSUs, SCBs, FIs and listed companies and leave and license agreements with such employers allocating official accommodation.

However, the customer after submitting the above said OVD, has to submit the updated OVD within 3 months with current address.

- e. A customer already having an account-based relationship with the Company, shall submit his Permanent Account Number or Form No.60, on such date as may be notified by the Central Government.
- f. If a customer having an existing account based relationship with the Company gives in writing to the company that he/ she does not want to submit his/her Permanent Account Number or Form No.60, as the case may be, the customer's account with the Company shall be closed and all obligations due in relation to the account shall be appropriately settled after establishing the identity of the customer
- g. The company while establishing a relationship with Politically Exposed

Person (PEP) will ensure identity of PEP, gather sufficient information about his/her sources of funds including his close relatives, undertake enhanced monitoring on an on-going basis, permission taken at senior level in accordance with company's customer acceptance policy. In case the existing account subsequently becoming PEP, senior management's approval shall be obtained to continue his account and his account shall be put on enhanced monitoring.

- h. such other documents pertaining to the nature of business or financial status as may be deemed fit.

CDD Measures for Sole Proprietary Firms

For opening an account in the name of a sole proprietary firm, identification information as mentioned under Para D above in respect of the individual (proprietor) shall be obtained.

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/licence issued by the municipal authorities under Shop and Establishment Act.
- c) Sales and income tax returns.
- d) CST/V AT/CST 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 DCFT/Licence/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.
- h) Utility bills such as electricity, water, and landline telephone bills.

In cases where it is satisfied that it is not possible to furnish two such documents, any one of the aforesaid documents as proof of business/activity may be accepted.

Provided Company shall 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.

CDD Measures for Legal Entities

- a. For opening an account of a company, one certified copy 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. one copy of an OVD containing details of identity and address, one recent photograph and Permanent Account Numbers of Form 60 of the managers, officers or employees, as the case may be, holding an attorney to transact on its behalf.
- b. For opening an account of a partnership firm, one certified copy of each of the following documents shall be obtained:
- a. Registration certificate;
 - b. Partnership deed;
 - c. Permanent Account Number of the partnership firm;
 - d. one copy of an OVD containing details of identity and address, one recent photograph and Permanent Account Numbers of Form 60 of the managers, officers or employees, as the case may be, holding an attorney to transact on its behalf.
- C. For opening an account of a trust, one certified copy 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. one copy of an OVD containing details of identity and address, one recent photograph and Permanent Account Numbers of Form 60 of the managers, officers or employees, as the case may be, holding an attorney to transact on its behalf-

Customer Acceptance Policy:

It lays down the criteria for acceptance of customers. The guidelines in respect of the customer relationship are as follows:

- i) A loan will be sanctioned only to those customers who have applied to the Company through a formal application which is provided to them by the Company.
- ii) No account is to be opened in anonymous or fictitious/benami name(s)/entity (ies)

- iv) Not to give a loan to any applicant or close any existing loan where the Company is unable to apply appropriate customer due diligence measures i.e. the Company is unable to verify the identity and/or obtain documents required as per the risk categorisation due to the non-co-operation of the applicant/customer or non-reliability of the data/information furnished by such applicant/customer. Company shall apply CDD measures for all co-applicants/co-borrowers.
- v) Accept customers only after verifying their identity, as laid down in Customer Identification Procedures.
- vi) 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.
- vii) Documentation requirements and other information to be collected, as per PMLA and RBI guidelines/instructions, to be complied with
- viii) Identity of a new customer to be checked so as to ensure that it does not match with any person with known criminal background or banned entities or whose names appear in the sanctions lists issued by UN Security Council circulated by National Housing Bank and the sanctions lists circulated by Reserve Bank of India from time to time, such as individual terrorists or terrorist organizations, etc.
- ix) 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.
- x) The customer profile prepared by company will contain information relating to the customer's identity, social/financial status, nature of business activity, information about his clients' business and their location, etc. The nature and extent of due diligence will depend on the risk perceived by the Company. However, while preparing customer profile only such information will be taken from the customer which is relevant to the risk category and is not intrusive. The customer profile will be a confidential document and details contained therein shall not be divulged for cross selling or any other similar purposes without express permission of the Customer. However, the customer profile may be shared with a Credit Bureau, empanelled vendors subject to the confidentiality clause and/or other agencies as required by law.
- xi) In the event the applicant is either of the following, the loan may be operated by the designated officer of such applicants subject to necessary documents being made available allowing such persons to operate the loan account and which are in conformity with the laws and practices of the land.
 - a) Private Limited/Limited Company;

- b) Partnership firm.

- Xii) At the time of any part or full prepayment of the loan by customers, a declaration will be obtained from such customers as to the source of the funds (as per NHB Directions issued from time to time) which are being paid to the Company.
- Xiii) No transaction or account-based relationship will be undertaken without following the customer due diligence.
- Xiv) Mandatory Information shall be sought from Customer for KYC purpose while opening an account and during the periodic updation.
- XV) Optional/additional information, if required, will be obtained by the Company with consent of the customer after the loan has been given.

- Xvi) In case the existing KYC compliant customer of the company desirous of availing another loan, the company will not undertake fresh customer due diligence exercise.

2) Risk Management Categorization of Customer(s)

For the purpose of applying the guidelines for identification and underwriting of customers, they will be broadly divided into low, medium and high-risk categories as follows:

a. **Low Risk:** For the purpose of risk categorization, individuals and entities whose identities and sources of wealth can be easily identified and transactions in whose accounts by and large conform to the known profile, shall be categorized as low risk. Illustrative examples of low risk customers are

- a. Salaried employees whose salary structures are well defined and salary is paid by cheque;
- b. People belonging to government departments, Public Sector Units, Public Limited Companies, Multinational Companies etc;
- c. Self-employed customers with proper income documents such as ITR, P&L and Balance sheets etc.

b. Medium Risk: Individuals or entities whose source of wealth can be established through reference checks and verification shall be categorised as medium risk. Illustrative examples of medium risk customers are:

- a. Salaried applicants working with Private Companies or small enterprises where the income is verified with the employer (Cash Salaried)
- b. Contractually employed applicants with variable income/unstructured income where the income is verified with the principal / primary source of income;
- c. Self-employed customers with a sound business where we can verify with suppliers/customers as to nature and volume of transactions as well as credibility in business dealings.

c. High Risk: Individuals or entities that pose a higher than average risk to the Company will be categorised as high-risk customers. This will be ascertained at the time of credit underwriting after looking at the customers background, nature of business/employment, predictability of cash flows etc. Illustrative examples of high-risk customers will be -

- a. Politically Exposed persons;
- b. Daily wage earners/persons without a permanent place of work;
- c. Seasonal wage earners.

d. Responsibility has also been explicitly allocated within the company for ensuring that the company's policies and procedures are implemented effectively. The nature and extent of due diligence will depend on the risk perceived by the branch/company. However, while preparing customer profile branches should take care to seek only such information from the customer which is relevant to the risk category and is not intrusive.

e. The company's internal audit has an important role in evaluating and ensuring adherence to the KYC policies and procedures. It should provide an independent evaluation of the company's own policies and procedures, including legal and regulatory requirements. It would be ensured that the audit machinery is staffed adequately with individuals who are well versed in such policies and procedures. Chief Operating Officer is the principal officer for monitoring Anti Money Laundering Issues.

3) Maintenance of records of transactions / Information to be preserved / Maintenance and preservation of records / Cash and Suspicious transactions

- a) Maintenance of records of transactions
- b) All cash transactions of the value of more than Rupees Ten Lakh or its equivalent in foreign currency
- c) All series of cash transactions integrally connected to each other which have been individually valued where such series of transactions have taken place within a month and the monthly aggregate value of such transactions exceeds Rupees Ten Lakh or its equivalent in foreign currency
- d) All transactions involving receipts by non-profit organisations of value more than rupees ten lakh, or its equivalent in foreign currency
- e) All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security or a document has taken place facilitating the transaction
- f) All suspicious transactions whether or not made in cash and by way of any of the modes as mentioned in the rules
- g) All cross-border wire transfer of the value of more than five lakhs rupees or its equivalent in foreign currency where either the origin or destination of fund is in India.

Reporting by	Reporting to
1. Branch	1. Controlling office (Regional/Head Office)
2. Controlling Office	2. Principal Officer (PO).H.O
3. P.O/H.O	3.FIU- IND

All cash transactions, where forged or counterfeit Indian currency notes have been used, shall also be reported immediately by the branches, by way of Counterfeit Currency Reports (CCRs) to the Principal Officer, through proper channel, for onward reporting to FIU-IND.

i) Maintenance and Preservation of records

i) The Company shall maintain the records of all transactions including the records containing information in respect of transactions. The Company shall take appropriate steps to evolve a system for proper maintenance and preservation of account information and allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities. Further, the Company shall maintain for at least five years from the date of transaction between the company and the client, all necessary records of transactions, both domestic / international, which will permit reconstruction of individual transactions so as to provide, if necessary, 2 evidence for prosecution of persons involved in criminal activity.

ii) The company shall ensure that records pertaining to the identification of the customer and his address (e.g. copies of documents like passports, identity cards, driving licenses, PAN card, utility bills etc.) obtained are properly preserved for at least five years after the business relationship is ended.

4) Counterfeit Currency Reports (CCR)

All cash transactions, where forged or counterfeit currency notes or bank notes have been used as genuine or where any forgery of document has taken place facilitating the transactions should be reported.

5) Suspicious transaction reports (STR)

a) The suspicious transaction report shall be furnished within 14 days of arriving at a conclusion that any transaction, whether cash or non-cash, or a series of transactions integrally connected are of suspicious nature as listed in Annexure-II

b) While determining suspicious transactions, the Company shall be guided by definition of suspicious transaction contained in the rules as amended from time to time.

6) Confidentiality of customer data

The Company shall treat the information collected from the customer for availing Loans as confidential and shall not divulge any details for cross selling or any other like purposes. Company shall ensure that information sought from the customer is relevant to the perceived risk and is not intrusive.

7) Original to be Seen and Verified:

All original KYC documents to be seen and verified by employees of AHFL, Approved DSA and employees of channel partners.

8) Ongoing Due Diligence

Ongoing monitoring is an essential element of effective KYC procedures. Hence, we can effectively control and reduce their risk basis understanding of the normal and reasonable activity of the customer when they fall outside the regular pattern of activity.

A periodic visit to customer place by the Cluster manager shall be done and a brief update shall be submitted which forms part of the risking exercise.

9) Periodic KYC Updation

Periodic KYC updation 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.

We shall carry out

- i) PAN verification from the verification facility available with the issuing authority and
- ii) Authentication, of Aadhaar Number already available with the HFC 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 updation from individuals except those who are categorised as 'low risk'. In case of low risk customers when there is no change in their identities and addresses, a self-certification to that effect shall be obtained

10) Sharing KYC information with Central KYC Records Registry (CKYCR)

Company shall capture the KYC information for sharing with the CKYCR. Government of India has authorised the Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI), to act as, and to perform the functions of the CKYCR. The Company is required to upload the Know Your Customer (KYC) data with CERSAI in respect of new individual accounts opened on or after November 01, 2016. Going forward, Company shall upload KYC with CERSAI within 30 days as and when new account is opened by the Company.

11) Designated Director:

Mr. Venkatesh Kannappan, Managing Director & CEO of the Company as the designated director to ensure overall compliance with the obligations imposed under Chapter IV of the Prevention of Money-Laundering Act, 2002 and the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005, respectively and amendments thereto.

Principal Officer:

Mr. Somesh Dixit, Chief Operating Officer

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ANNEXURE I

Customer identification means identifying the customer and verifying his / her identity by using reliable, independent source documents, data or information. List of Officially valid documents (OVDs) that will be obtained from customers.

S.No.	Selection Criteria	Parameters
1.	List of Documents	<p>Identification Proof :</p> <ul style="list-style-type: none">• Aadhaar Card• Valid Passport (Mandatory for NRI)• PAN Card• Photo Driving License• Photo Credit Card of a Scheduled Commercial Bank• Photo ID Card of Professional Councils, Government/PSU• Banker's Verification• Photo Ration Card• Photo Election ID Card
		<p>Signature Proof:</p> <ul style="list-style-type: none">• Valid Passport• PAN Card• Photo Driving License• Bankers verification• Thumb Impression with independent witness
		<p>Proof of Residential Address</p> <ul style="list-style-type: none">• Aadhaar Card• Passport• Voter's ID Card• Driving License• Ration Card• Telephone Bill• Gas Bill (Only HP or Indane)• Power/Electricity Bill• Registered Rental Agreement• Insurance Premium Receipt• Bank statement of 1 month• Registered Sale deed

		<p>Proof of Date of Birth</p> <ul style="list-style-type: none">• Birth Certificate• Passport• PAN Card• Driving License• School leaving certificate• Insurance policy schedule
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- Birth Certificate
- Passport
- PAN Card
- Driving License
- School leaving certificate
- Insurance policy schedule

Annexure-II

List of Suspicious Transactions Pertaining to House Loans:

- a. Customer is reluctant to provide information, data, documents;
- b. Submission of false documents, data, purpose of loan, details of accounts;
- c. Refuses to furnish details of source of funds by which initial contribution is made, sources of funds is doubtful etc;
- d. Reluctant to meet in person, represents through a third party/Power of Attorney holder without sufficient reasons;
- e. Approaches a branch/office of the company, which is away from the customer's residential or business address provided in the loan application, when there is Company branch/office nearer to the given address;
- f. Initial contribution made through unrelated third-party accounts without proper justification;
- g. Availing a top-up loan and/or equity loan, without proper justification of the end use of the loan amount;
- h. Suggesting dubious means for the sanction of loan;
- i. Where transactions do not make economic sense;
- j. There are reasonable doubts over the real beneficiary of the loan and the flat to be purchased;
- k. Encashment of loan amount by opening a fictitious bank account;
- l. Applying for a loan knowing fully well that the property/dwelling unit to be financed has been funded earlier and that the same is outstanding;
- m. Sale consideration stated in the agreement for sale is abnormally higher/lower than what is prevailing in the area of purchase;
- n. Multiple funding of the same property/dwelling unit;
- o. Usage of loan amount by the customer in connivance with the vendor/builder/developer/broker/agent etc. and using the same for a purpose other than what has been stipulated;
- p. Multiple funding / financing involving NGO / Charitable Organization / Small / Medium Establishments (SMEs) / Self Help Groups (SHGs) / Micro Finance Groups (MFGs);
- q. Frequent requests for change of address;
- r. Overpayment of instalments with a request to refund the overpaid amount.