

Sriffin Credit Private Limited

Policy on KYC Documents

1.1. Objective

The objective of this policy is to provide detailed information for verifying, collecting, and updating the KYC documents of Customers on every loan application in Loan Management System ("LMS").

1.2. Scope

This policy will cover all the Customers of the Company.

For the purpose of this Policy, a 'Customer' means:

- a) a person or entity that maintains an account and/or has a business relationship with the Company;
- b) one on whose behalf the account is maintained (i.e. the Beneficial Owner). A list of persons who are to be considered as such Beneficial Owners in relation to a Customer is:

Type of Customer	Persons to be considered Beneficial Owners
Public / Private Limited Companies	a) Board of Directors b) Shareholders holding 10% or more of the paid-up share capital of the Company
Partnership Firm	Partners
Trusts / Foundations	a) Trustees / founders / Settlers b) Beneficiaries of the Trust

- c) beneficiaries of transactions conducted by professional intermediaries, such as Stock Brokers, Chartered Accountants, Solicitors etc. as permitted under the law; and
- d) any person or entity involved in a financial transaction with the Company.

1.3. Applicability

This policy will be effective from October 18, 2023.

1.4. Purpose

The purpose of this policy is to ensure that the Company complies with RBI guidelines on KYC and to protect the Company from fraud.

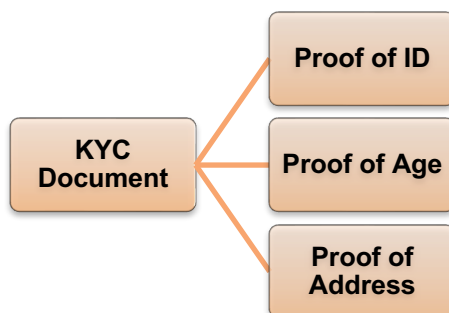
1.5. Features

KYC Documents

- ☐ Customers must have RBI approved KYC documents of herself, spouse, household members, co-insured as well as nominee.
- ☐ As per RBI guidelines, the Company need to have enough information about the Customers with whom the Company deals. We are required to procure documentary proof of the

customer that shows her name, Age, Address and Photograph and are declared as “Officially valid documents” for KYC by RBI.

- The document that is being submitted should be from a competent authority and should contain a "Unique number" specific to that document. A document without a unique number should not be collected.
- **At least two KYC documents (primary and secondary) must be collected from every customer.**
- Customer must have a **Proof of Identity and residence (KYC)** as per below-mentioned guidelines:



KYC collection details: - Customer Due Diligence (CDD) Procedures

- As per the CDD policy, the Company identifies and verify customers and the beneficial owners using ‘Officially Valid Documents’ as ‘proof of identity’ and ‘proof of address’.
- **Primary Document-** Aadhaar Card or Voter ID is used as a mandatory document for both ‘proof of identity’ and ‘proof of address.’
- **Secondary Document-** For customers, apart from primary id proof one supporting document will also be collected.

KYCs	Customer KYCs	Spouse KYCs	For Family Members	For Co-insured	For Nominee
Primary KYC ID	Mandatory KYC- either of UID or Voter ID card	Any one of: - UID Voter ID PAN Card Driving License	If the age of the family member is equal to or greater than 18 years, then any one of: - UID Voter ID PAN Card Driving License	Any one of: - UID Voter ID PAN Card Driving License	Any one of: - UID Voter ID PAN Card Driving License
Secondary KYC ID	If Primary KYC is UID then by default secondary KYC will be Voter ID and if UID is not filled as Primary KYC, then Voter ID will be treated as Primary KYC and secondary KYC will be any one of: - Narega Card Passport Driving License Pan Card	N/A	N/A	N/A	N/A

1.6. Implementation

This policy will be implemented by the following steps:

1. The customer must provide their KYC documents to the LMS.
2. The LMS will verify the documents and ensure that they are valid.
3. The LMS will store the documents in a secure location.

1.7. Review

- ☐ The policy will be reviewed annually, or more frequently if there are any significant changes in the regulatory environment.
- ☐ The Board of Directors will review the policy and make any necessary changes based on the following criteria:
 - ☐ Compliance with regulatory requirements
 - ☐ Effectiveness in achieving the policy's objectives.
 - ☐ Suitability for the target borrowers

1.8. Exceptions

Any exceptions to the above-mentioned points must be approved by the Board of Directors.

1.9. Amendments to Policy

The Board of Directors based on the recommendations of MD & CEO and based on regulatory changes can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.