

KNOW YOUR CUSTOMER POLICY

(Reviewed by the Board of Directors on June 24, 2023)

KYC policy has been framed by the Company for the following reasons. To prevent the company from being used intentionally or unintentionally by criminal elements for money laundering activities. To enable the company to know/understand its customers and their financial dealings which intern would help us to manage its risk prudently. To put in place appropriate control to detection and reporting of suspicious activities in accordance with applicable laws and regulatory guidelines.

Customer Identification

Customer Identification means verification of customer identity by using reliable, independent source documents, data or information. We shall obtain enough information necessary to verify the identity of each Customer.

A Customer Unique Identification Number (**UIN**) shall be allotted to new customers. Thus, if an existing KYC compliant customer of KLM Axiva finvest desires to open another account there shall be no need for a fresh UIN.

Proof of Identity (Annexure 1)

1. PAN card
2. Aadhar/Passport/Voter ID card/ Driving license
3. Identity card/document with applicant photo by any of the following

Central/State Government and its department /Statutory bodies/Regulatory authorities public sector undertaking, Schedule/ Commercial Banks, Public financial institution, College affiliated to Universities, Professional bodies such as ICWA, ICSI, Bar Council etc. to their members and Credit card /Debit card issued by Banks.

Proof of Address (Annexure 1A)

1. Passport/Voters ID card/Ration card/Driving license
2. Registered Lease or sale deed agreement of residence /Flat maintenance Bill/Insurance Copy/Utility bills like Telephone bills/Electricity bill or Gas bill not more than 03 months old.
3. Bank account statement signed by Branch manager/ Bank Passbook, Proof of address issued by Bank managers of scheduled and Commercial banks, Scheduled Cooperative banks/Notary public, Elected representatives of legislative assembly/Parliament, Documents issued by any Government statutory bodies.



Customer Acceptance

Customers will be accepted only after verifying their identity, as laid down in Customer Identification Procedures. Necessary checks will be done before opening a new account to ensure that the identity of the Customer does not match with any person with known criminal background or with banned entities.

Counter staff should also make attempt to acquire additional information such as mobile number, employment status, net worth, investments etc. Such information gathered not only strengthens the KYC process but also for developing better business connection with that customer.

Customer due Diligence

We shall obtain the above documents from an individual while establishing an account-based relationship with the company. A certified copy of Officially Valid Documents (OVD), as given in Annexure I and 1A, containing details of proof of their identity and address, One recent photograph (For the gold loan customers capturing of photos of the individuals by the system to be continued). Branch staff should verify the KYC documents with originals and a seal in the format **"verified with original"** should be affixed and verifying officer should sign on it and should be filed neatly in serial order for future reference.

Monitoring Financial Transactions

Monitoring of transactions is an essential part of effective KYC. In fact we can effectively manage and mitigate our risk factor only by clear understanding of financial activity of a new customer. Accordingly it is important to ensure that any suspicious transaction should be reported to appropriate authority.

Risk Management

Our audit Department periodically evaluates the level of adherence to the KYC procedures. Audit function shall provide an independent evaluation of the effectiveness of KYC policies and procedures, including legal and regulatory requirements.

We should also educate our customers about the scammers who ask them to update their KYC information to lure the customers into sharing confidential details on the pretext of KYC updation for unblocking of account/SIM card, approval for financial transactions etc.

Reserve bank of India has given clear directives about the importance of KYC compliances through circulars and notifications and is modified from time to time to strengthen the same. RBI also imposed penalties on various occasions for deficiencies in certain regulatory compliance with regard to KYC.





(Formerly known as Needs Finvest Ltd)

CIN: U65910TG1997PLC026983

So all our branches should deal the KYC procedures with due diligence so that it helps to establish customer identity, allows us to understand the nature of customer activities, assess the money laundering risk and also to avoid penalties imposed by RBI for non-compliance.

A handwritten signature in black ink is positioned above a circular blue ink stamp. The stamp contains the text 'KLM AXIVA FINVEST LTD' around its perimeter.