



MOONGIPA
CAPITAL FINANCE LTD.

KNOW YOUR CUSTOMER (KYC) POLICY

Version: 1.0

Approved By: Board of Directors

Effective Date: 25/05/2026

Review Frequency: Annual or as required by RBI regulations

(CIN: L65993DL1987PLC028669)

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1. PREAMBLE

This Know Your Customer (KYC) Policy ("Policy") has been formulated in accordance with the provisions of:

- The Prevention of Money Laundering Act, 2002 (PMLA)
- The Prevention of Money Laundering (Maintenance of Records) Rules, 2005
- RBI Master Direction – Know Your Customer (KYC) Direction, 2016 (as amended from time to time)
- Applicable guidelines issued by the Reserve Bank of India (RBI)

The objective of this Policy is to prevent Moongipa Capital Finance Limited ("MCFL" or "the Company") from being used, intentionally or unintentionally, for money laundering, terrorist financing, fraud, or any other unlawful activities.

2. OBJECTIVES

The objectives of this Policy are to:

- Verify the identity of customers.
- Ensure compliance with RBI KYC and Anti-Money Laundering (AML) requirements.
- Prevent identity theft, fraud, money laundering and terrorist financing.
- Monitor customer transactions and relationships.
- Maintain records as prescribed under applicable laws.
- Promote transparency and customer due diligence.

3. APPLICABILITY

This Policy shall apply to:

- All branches and offices of the Company.
- Directors, officers and employees of the Company.
- All customers availing any financial products or services offered by the Company.

4. DEFINITIONS

Customer

A person or entity that maintains an account and/or has a business relationship with the Company.

Officially Valid Document (OVD)

The following documents shall be considered OVDs:

- Passport
- Driving Licence
- Proof of Possession of Aadhaar Number
- Voter Identity Card
- NREGA Job Card duly signed by a State Government Officer
- Letter issued by National Population Register containing details of name and address
As may be amended by RBI from time to time.

Beneficial Owner

The natural person(s) who ultimately owns or controls a customer or on whose behalf a transaction is being conducted.

5. CUSTOMER ACCEPTANCE POLICY (CAP)

The Company shall:

5.1 Accept Customers Only After

- Conducting Customer Due Diligence (CDD).
- Obtaining required KYC documents.
- Verifying customer identity and address.
- Identifying beneficial owners wherever applicable.

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5.3 Risk-Based Approach

Customers shall be categorized as:

Low Risk

Examples:

- Salaried employees.
- Government departments.

- Public sector undertakings.

Medium Risk

Examples:

- Small businesses.
- Self-employed professionals.

High Risk

Examples:

- Politically Exposed Persons (PEPs).
- Non-resident customers.
- Trusts, NGOs and charitable organizations.
- Customers dealing in cash-intensive businesses.

Enhanced Due Diligence shall be applied to high-risk customers.

6. CUSTOMER IDENTIFICATION PROCEDURE (CIP)

Prior to establishing a relationship, the Company shall obtain and verify:

Individual Customers

- PAN Card
- Aadhaar/other OVD
- Photograph
- Mobile Number
- Email ID (where available)

Companies

- Certificate of Incorporation
- Memorandum & Articles of Association
- PAN
- Board Resolution
- Authorized Signatory Details
- Beneficial Ownership Details

Partnership Firms

- Partnership Deed
- PAN
- Registration Certificate (where applicable)
- KYC of Partners

Trusts

- Trust Deed
- Registration Certificate
- PAN
- Trustee Identification Documents

7. CUSTOMER DUE DILIGENCE (CDD)

The Company shall undertake:

Simplified Due Diligence

For low-risk customers as permitted by RBI.

Standard Due Diligence

For normal-risk customers.

Enhanced Due Diligence (EDD)

For high-risk customers including:

- Politically Exposed Persons (PEPs)
- Non-resident customers
- High-value transactions
- Complex ownership structures

EDD may include:

- Additional documentation.
- Source of funds verification.
- Senior management approval.

8. BENEFICIAL OWNERSHIP IDENTIFICATION

The Company shall identify beneficial owners as per RBI and PMLA requirements.

For companies:

- Natural persons owning or controlling more than 10% of shares/capital/profits.

For partnership firms:

- Natural persons owning or entitled to more than 10% of capital or profits.

For trusts:

- Author, trustee, beneficiaries and controlling persons.

9. POLITICALLY EXPOSED PERSONS (PEPs)

The Company shall:

- Obtain senior management approval before establishing relationships with PEPs.
- Establish source of funds and source of wealth.
- Conduct enhanced ongoing monitoring.

10. ONGOING DUE DILIGENCE

The Company shall continuously monitor customer relationships and transactions to ensure consistency with:

- Customer profile.
 - Source of funds.
 - Nature of business activities.
- The Company may seek updated KYC information whenever required.

11. KNOW YOUR CUSTOMER (KYC) POLICY

The Company shall:

- Identify suspicious transactions.
- Report Suspicious Transaction Reports (STRs) to the Financial Intelligence Unit – India (FIU-IND), wherever required.
- Maintain confidentiality regarding STR filings.
Employees shall not disclose the filing of STRs to customers.

12. CUSTOMER RISK CATEGORIZATION

Customer risk categorization shall be reviewed periodically based on:

- Nature of business.
 - Transaction pattern.
 - Geographic location.
 - Source of funds.
 - Regulatory concerns.
- The Company reserves the right to reclassify customers based on emerging risks.

13. PERIODIC UPDATION OF KYC

KYC records shall be updated periodically as prescribed under RBI KYC Directions.

14. EMPLOYEE TRAINING

The Company shall conduct regular training programs for employees to:

- Familiarize them with KYC/AML/CFT requirements.
- Detect suspicious transactions.
- Ensure effective implementation of the Policy.

15. REVIEW OF POLICY

This Policy shall be reviewed periodically and amended whenever required to align with:

- RBI KYC Directions.
- Prevention of Money Laundering Act, 2002.
- Rules, regulations, and regulatory circulars issued from time to time.

16. APPROVAL

This Know Your Customer (KYC) Policy has been approved by the Board of Directors of **Moongipa Capital Finance Limited** and shall come into force with immediate effect.