

Know Your Customer (KYC) Policy

Introduction

This Know Your Customer ("KYC") Policy outlines the principles and procedures that Perpetuity Capital and Oracle Marketing Private Limited adheres to in order to comply with regulatory requirements and ensure the integrity of our customer base. As a lending and non-banking finance company (NBFC) regulated by the Reserve Bank of India (RBI), we finance electric vehicles and renewable green assets for commercial use with a retail finance focus in India. This policy is designed to prevent money laundering, terrorist financing, and other illegal activities by ensuring that we adequately identify and verify our customers.

1. Objectives

- 1.1 To establish a robust customer identification program.
- 1.2 To ensure compliance with applicable laws and regulations, including RBI guidelines on KYC.
- 1.3 To prevent the use of our financial services for money laundering, terrorist financing, and other illegal activities.
- 1.4 To protect the reputation and integrity of Perpetuity Capital/Oracle Marketing Private.

2. Scope

This policy applies to all customers, including individuals, partnerships, companies, and other legal entities seeking to establish a business relationship with Perpetuity Capital/Oracle Marketing Private..

3. Customer Identification Program (CIP)

3.1 Customer Identification

All customers are required to provide accurate and complete identification information at the time of account opening or prior to establishing a business relationship. The identification process involves the following steps:

1. Individuals:

- Proof of Identity (POI): Aadhaar Card, PAN Card, Voter ID, Passport, or Driving License.
- Proof of Address (POA): Utility Bill (Electricity/Gas), Aadhaar Card, Voter ID, Passport, or any other document approved by the RBI.

2. **Non-Individuals:**

- Partnerships: Partnership deed, registration certificate, PAN Card, and identity documents of authorized signatories.
- Companies: Certificate of incorporation, Memorandum and Articles of Association, PAN Card, and identity documents of directors and authorized signatories.
- Other Entities: Trust deed, registration certificate, PAN Card, and identity documents of authorized signatories.

3.2 **Verification**

The identification documents provided by the customer will be verified using reliable and independent sources. Verification may involve:

1. **Document Verification:** Checking the authenticity of the identification documents provided using third party Application Programming Interfaces (APIs).
2. **Address Verification:** Confirming the address through physical visits or third-party verification services.
3. **Biometric Verification:** Using biometric data (such as Aadhaar) for identity verification, where applicable.

4. **Risk-Based Approach**

4.1 **Customer Risk Assessment**

Customers will be categorized based on their risk profile, which takes into account factors such as:

1. **Nature of Work/Business:** Higher risk for businesses in industries prone to money laundering or terrorist financing.
2. **Geographic Location:** Higher risk for customers from regions with high levels of corruption or terrorist activity.
3. **Transaction Pattern:** Unusual or suspicious transaction patterns that may indicate illegal activities.

4.2 **Enhanced Due Diligence (EDD)**

For high-risk customers, enhanced due diligence measures will be undertaken, including:

1. **Additional Documentation:** Requesting further identification documents and information.

2. **In-Person Meetings:** Conducting face-to-face meetings to verify the customer's identity and business activities. Additionally the address of the borrower's home or work is geotagged for verification purposes.
3. **Ongoing Monitoring:** Regularly reviewing and monitoring the customer's account and transaction activities.

5. Customer Due Diligence (CDD)

5.1 Initial Due Diligence

Prior to establishing a business relationship, the following steps will be taken:

1. **Identity Verification:** As outlined in the CIP.
2. **Background Check:** Conducting background checks to identify any adverse information about the customer.
3. **Beneficial Ownership:** Identifying and verifying the beneficial owners of non-individual customers.

5.2 Ongoing Due Diligence

Throughout the business relationship, ongoing due diligence will be conducted, including:

1. **Transaction Monitoring:** Monitoring transactions for unusual or suspicious activities.
2. **Periodic Reviews:** Regularly updating customer information and risk assessments.
3. **Reporting:** Reporting suspicious transactions to the Financial Intelligence Unit-India (FIU-IND) as required by law.

6. Record Keeping

6.1 Retention Period

All customer identification records and transaction records will be maintained for a minimum period of **five** years after the business relationship has ended or the transaction has been completed.

6.2 Accessibility

Records will be maintained in a manner that allows for prompt retrieval and accessibility to relevant authorities upon request.

7. Employee Training and Awareness

7.1 Training Program

Regular training programs will be conducted for employees to ensure awareness and understanding of KYC requirements, anti-money laundering (AML) measures, and counter-terrorist financing (CTF) obligations.

7.2 Responsibility

Employees are responsible for adhering to this policy and reporting any suspicious activities or discrepancies in customer information to the designated compliance officer.

8. Compliance and Review

8.1 Compliance Officer

A designated compliance officer will oversee the implementation and adherence to this policy. The compliance officer will also be responsible for liaising with regulatory authorities and ensuring timely submission of required reports.

8.2 Policy Review

This policy will be reviewed periodically and updated to reflect changes in regulations, industry best practices, and the evolving risk landscape.

Conclusion

Perpetuity Capital and Oracle Marketing Private Limited is committed to maintaining the highest standards of customer identification and verification to prevent money laundering, terrorist financing, and other illegal activities. By adhering to this KYC Policy, we aim to protect the integrity of our financial services and foster trust and confidence among our customers and stakeholders.

For any questions or further information regarding this Policy, please contact audit@perpetuitycapital.in or call +91 81001 14060.

Stamp & Sign



Sumanta Roy (Audit Officer)
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