

KNOW YOUR CUSTOMER AND ANTI-MONEY LAUNDERING POLICY

Version	Approval Date
Version V1	November 6, 2019
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1. PREAMBLE

- 1.1 Vivriti Asset Management Private Limited (**VAMPL**), a company incorporated under the Companies Act, 2013, is a subsidiary of Vivriti Capital Private Limited and acts as the manager of certain alternate investment funds established in accordance with the Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012 (**AIF Regulations**). VAMPL, *inter alia*, acts as the manager of the scheme(s) of Vivriti Vihaan Trust registered as a Category II Alternative Investment Fund with the Securities and Exchange Board of India (**SEBI**) under the AIF Regulations and other schemes of Vivriti Vihaan Trust and funds, as may be registered with SEBI (together "**Fund**").

SEBI circular no. SEBI/ HO/ MIRSD/ DOP/ CIR/ P/ 2019/113 on "*Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) /Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under*" dated October 15, 2019 (read with The Prevention of Money Laundering Act, 2002 (**PML Act**)), requires all intermediaries to have a comprehensive policy in relation to anti-money laundering and combating the financing of terrorism (**AML**). Additionally, post the above master circular, SEBI has from time to time issued few other circulars – SEBI circular dated April 24, 2020 (SEBI/HO/MIRSD/DOP/CIR/P/2020/73), SEBI Circular dated March 10, 2021 (SEBI/HO/MIRSD/DOP/CIR/P/2021/31), SEBI Circular dated April 6, 2022 (SEBI/HO/MIRSD/DoP/P/CIR/2022/46), SEBI Circular dated July 27, 2022 (SEBI/HO/MIRSD/SEC-5/P/CIR/2022/100) and SEBI Circular dated February 03 2023. VAMPL/Fund shall follow the above-mentioned master circular and other circulars as issued by SEBI from time to time for AML/KYC purpose. Other circulars as may be issued from time shall continue to be followed by VAMPL/Fund.

- 1.2 Unless otherwise defined, capitalized terms have the meaning given to them in the "legend" provided at the end of this document.

2. OBJECTIVES

- 2.1 To prescribe a framework for "know your customer" (**KYC**) requirements for VAMPL/Fund.
- 2.2 To prescribe client identification and acceptance policies and procedures which are sensitive to the risk of money laundering and terrorist financing.
- 2.3 To establish suitable framework to take appropriate measures in relation to any suspicious activities.

3. APPLICABILITY AND SCOPE

3.1 This policy will be applicable to investors of Fund, existing and proposed clients of Fund/VAMPL, and their financial transactions carried out through Fund/VAMPL. **(Client)**.

3.2 This policy covers the following:

- (a) Client acceptance and risk assessment;
- (b) record keeping;
- (c) monitoring of transaction;
- (d) reporting of suspicious transaction;
- (e) appointment of the Principal Officer and the Designated Director; and
- (f) training of employees.

4. POLICIES & PROCEDURES TO COMBAT MONEY LAUNDERING & TERRORIST FINANCING:

- (a) VAMPL/Fund will issue a statement of policies and procedures, on a group basis where applicable, for dealing with ML and TF reflecting the current statutory and regulatory requirements.
- (b) VAMPL/fund will ensure that the content of SEBI guidelines related to Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) are understood by all staff members.
- (c) VAMPL/fund will regularly review the policies and procedures on the prevention of ML and TF to ensure their effectiveness. Further, in order to ensure the effectiveness of policies and procedures, the person doing such a review shall be different from the one who has framed such policies and procedures.
- (d) VAMPL/fund will adopt client acceptance policies and procedures which are sensitive to the risk of ML and TF.
- (e) VAMPL/Fund will undertake client due diligence (“CDD”) measures to an extent that is sensitive to the risk of ML and TF depending on the type of client, business relationship or transaction.
- (f) VAMPL/fund will have in system a place for identifying, monitoring and reporting suspected ML or TF transactions to the law enforcement authorities.
- (g) VAMPL/ fund will develop staff members’ awareness and vigilance to guard against ML and TF through annual trainings.

5. MEASURES to Combat ML:

VAMPL/Fund policies and procedures to combat ML shall cover:

- (a) Communication of group policies relating to prevention of ML and TF to all management and relevant staff that handle account information, securities transactions, money and client records etc. whether in branches, departments or subsidiaries;
- (b) Client acceptance policy and client due diligence measures, including requirements for proper identification;
- (c) Maintenance of records;
- (d) Compliance with relevant statutory and regulatory requirements;
- (e) Co-operation with the relevant law enforcement authorities, including the timely disclosure of information; and
- (f) Role of internal audit or compliance function to ensure compliance with the policies, procedures, and controls relating to the prevention of ML and TF, including the testing of the system for detecting suspected money laundering transactions, evaluating and checking the adequacy of exception reports generated on large and/or irregular transactions, the quality of reporting of suspicious transactions and the level of awareness of frontline staff, of their responsibilities in this regard. The internal audit function shall be independent, adequately resourced and commensurate with the size of the business and operations, organization structure, number of clients and other such factors.

6. PRINCIPLES

- 6.1 VAMPL/Fund will comply with the KYC requirements prescribed in the SEBI KYC-AML Circulars. VAMPL/Fund may propose further requirements in this regard based on the requirements of the SEBI KYC-AML Circulars and applicable laws.
- 6.2 VAMPL/Fund will conduct its business and operations in compliance with all applicable laws (including the PML Act and the SEBI KYC-AML Circulars).
- 6.3 VAMPL/Fund will conduct due diligence on its prospective Clients prior to entering into any transactions with them.
- 6.4 VAMPL/Fund shall endeavour to identify, monitor and report all suspected money laundering and terrorist financing transactions to the relevant authorities.

7. CLIENT ACCEPTANCE AND RISK ASSESSMENT

7.1 KYC and Due Diligence

- (a) Subject to provisions of SEBI KYC-AML Circulars and other applicable laws, VAMPL/Fund shall obtain from each prospective Client a duly populated KYC Application Form as mentioned in SEBI Circular dated March 10, 2021 (SEBI/HO/MIRSD/DOP/CIR/P/2021/31) for Legal Entity and SEBI Circular dated July 21, 2016 (CIR/MIRSD/ 66 /2016) for individuals, along with the documents as specified in Annexure I below or such other form/documents as may prescribed under the SEBI KYC-AML Circulars or regulatory or other authority from time to time.
- (b) As per SEBI Circular dated January 24, 2013 (CIR/MIRSD/2/2013) or such other amendment/update as provided by SEBI from time to time, VAMPL/Fund shall also obtain such further information as may be required from a Client to establish the ultimate beneficial ownership of the Client. Whenever it is apparent that the securities acquired or maintained through an account are beneficially owned by a party other than the client, that party shall be identified using client identification and verification procedures. The beneficial owner is the natural person or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person or arrangement
- (c) VAMPL/Fund shall ensure that the KYC Application Form has been duly populated by the Client, and all mandatory documents have been obtained. VAMPL/Fund shall accept a copy of a document only upon verification of the original of such document. However, where such original documents are not available, VAMPL/Fund may accept copies of such documents duly attested in accordance with the SEBI KYC-AML Circulars or any other applicable law. Refer Annexure II Part A for the list of persons authorised to attest the documents. Compliance with paragraphs 4.1(b) and 4.1(c) shall be monitored by the Board of Directors.
- (d) VAMPL/Fund will conduct adequate due diligence of the prospective Client. Such due diligence will be conducted prior to on-boarding and at subsequent times, as may be required by any governmental authorities or applicable laws.
- (e) VAMPL/Fund shall obtain adequate information to satisfactorily establish the identity of each new Client and the purpose of the intended nature of relationship with such Client. Failure of the prospective Client to provide satisfactory evidence of identity must be reported to the board or board delegated Committee.
- (f) VAMPL/Fund will conduct an independent due diligence of the Client to:
 - (i) identify the risk perception of each Client;
 - (ii) identify any Client belonging to the Special Category. A higher degree of due diligence is required for Special Category Clients. A list of "Special Category Clients is provided in Annexure IV below;
 - (iii) identify and verify its beneficial ownership or control of the Client (if applicable). Refer Annexure III for guidelines for the identification of the beneficial ownership or control. Such identification is not required for Clients that are listed companies or are majority owned subsidiary of a listed company;

- (iv) identify whether the Client or its beneficial owners are “politically exposed persons” (**PEPs**); and
 - (v) verify the Client’s identity using reliable, independent source documents, data or information.
 - (vi) Verify the identity of the beneficial owner of the client and/or the person on whose behalf a transaction is being conducted, corroborating the information provided in relation to (iii).
 - (vii) Understand the ownership and control structure of the client.
 - (viii) Conduct ongoing due diligence and scrutiny, i.e. Perform ongoing scrutiny of the transactions and account throughout the course of the business relationship to ensure that the transactions being conducted are consistent with the registered intermediary’s knowledge of the client, its business and risk profile, taking into account, where necessary, the client’s source of funds.
 - (ix) VAMPL/Fund shall periodically update all documents, data or information of all clients and beneficial owners collected under the CDD process.
- (g) The persons conducting the due diligence shall submit the report of diligence along with their findings, if any, to the Principal Officer. The Principal Officer will, if required seek guidance from the Designated Director and the board or board delegated Committee to decide upon the level of diligence required for each Client (including the additional information required and monitoring processes for PEP) and to complete the due diligence of the Client on the basis of the foregoing.
 - (h) Such information that is collected during the due diligence process and is required by the SEBI KYC-AML Circulars to be updated on an annual basis shall be updated in accordance with the requirements prescribed in the SEBI KYC-AML Circulars.
 - (i) The due diligence required may be outsourced to a third-party agency, if any with the approval of the Board of Directors. Any such outsourcing must comply with the PML Act and the PML Rules and the applicable SEBI circulars and directions including SEBI’s guidelines on outsourcing by intermediaries and any directions of SEBI on the use of any KYC registration agency pursuant to the Securities and Exchange Board of India (KYC Registration Agency) Regulations, 2011. Any such third party must be regulated or supervised for, must have measures in place for, compliance with Client due diligence and record-keeping requirements prescribed under the PML Act. VAMPL/Fund shall also conduct ongoing due diligence in relation to the transactions engaged in by a Client through VAMPL/Fund to ensure that the transactions being conducted are consistent with the VAMPL/Fund’s knowledge of the Client, its business and risk profile, taking into account, where necessary, the Client’s source of funds.
 - (j) Board of Directors of VAMPL/Fund shall monitor the compliance of the aforementioned provision on identification of beneficial ownership through half-yearly internal audits.
 - (k) VAMPL/Fund will review the due diligence measures including verifying again the identity of the client and obtaining information on the purpose and intended nature of the business relationship, as the case may be, when there are suspicions of money laundering or financing of the activities relating to terrorism or where there are doubts about the adequacy or veracity of previously obtained client identification data.

- (l) The information obtained from the clients will be adequate enough to satisfy competent authorities (regulatory / enforcement authorities) in future that due diligence was observed by the VAMPL/fund in compliance with the directives. Each original document shall be seen prior to acceptance of a copy.
- (m) VAMPL/fund shall frame their own internal directives based on its experience in dealing with its clients and legal requirements as per the established practices.
- (n) VAMPL/fund shall obtain the minimum information/documents from clients as stipulated in the PML Rules/ SEBI Circulars (as amended from time to time) regarding the verification of the records of the identity of clients, irrespective of the amount of investment made by clients, no minimum threshold or exemption is available.
- (o) There shall be no minimum investment threshold/ category-wise exemption available for carrying out CDD measures by VAMPL/Fund.
- (p) VAMPL/Fund shall apply client due diligence measures also to existing clients on the basis of materiality and risk, and conduct due diligence on such existing relationships appropriately. The extent of monitoring shall be aligned with the risk category of the client.

7.2 Client Due Diligence Process for Foreign Investors:

VAMPL/Fund, while dealing with foreign investors will follow the SEBI Master Circular SEBI/HO/AFD-2/CIR/P/2022/175 dated December 19,2022 and amendments thereto, if any, for the purpose of identification of beneficial ownership of the client.

7.3 Role of Internal Audit and Compliance Function:

- a) To ensure compliance with the policies, procedures, and controls relating to the prevention of ML and TF.
- b) testing of the system for detecting suspected money laundering transactions.
- c) evaluating and checking the adequacy of exception reports generated on large and/or irregular transactions.
- d) the quality of reporting of suspicious transactions and the level of awareness of frontline staff, of their responsibilities.
- e) The internal audit function shall be independent, adequately resourced and commensurate with the size of the business and operations, organization structure, number of clients and other such factors.

7.4 Client Acceptance

VAMPL/Fund's Client Acceptance Policy will aim to identify the types of clients that are likely to pose a higher than average risk of ML or TF. By establishing such policies and procedures, it will be in a better position to apply client due diligence on a risk sensitive basis depending on the type of client business relationship or transaction.

- (a) VAMPL/Fund shall not deal with any Client that has provided any false information in the KYC Application Form.
- (b) VAMPL/Fund will ensure that no account is opened in a fictitious / benami name or on an anonymous basis.
- (c) VAMPL/Fund shall not deal with any Client whose information is found to be untrue or misleading on the conduct of due diligence.
- (d) VAMPL/Fund shall not deal with any Client having a known criminal background or is banned in any other manner, whether in terms of criminal or civil proceedings by any other authority.
- (e) VAMPL/Fund shall not deal with any Client operating from a Financial Action Task Force (FATF) non-compliant jurisdiction.
- (f) VAMPL/Fund shall not deal with any Client (or any Client associated with any entity) that has been mentioned in the list of individuals and entities subjected to sanction measures under the various United Nations' Security Council Resolutions.
- (g) Factors of risk perception (in terms of monitoring suspicious transactions) of the client are clearly defined having regard to clients' location (registered office address, correspondence addresses, and other addresses if applicable), nature of business activity, trading turnover etc. and manner of making payment for transactions undertaken. The parameters shall enable classification of clients including the Special Category Clients into low and high risk. High risk clients require a higher degree of due diligence and regular update of Know Your Client (KYC) profile.
- (h) Further, low risk provisions shall not apply when there are suspicions of ML/FT or when other factors give rise to a belief that the customer does not in fact pose a low risk.
- (i) Documentation requirements and other information to be collected in respect of different classes of clients depending on the perceived risk and having regard to the requirements of Rule 9 of the PML Rules, Directives and Circulars issued by SEBI from time to time.
- (j) VAMPL/Fund will ensure that an account is not opened where the intermediary is unable to apply appropriate CDD measures/ KYC policies. This shall apply in cases where it is not possible to ascertain the identity of the client, or the information provided to it is suspected to be non - genuine, or there is perceived non - co-operation of the client in providing full and complete information. VAMPL/fund shall not continue to do business with such a person and file a suspicious activity report. It shall also evaluate whether there is suspicious trading in determining whether to freeze or close the account. VAMPL/Fund shall be cautious to ensure that it does not return securities of money that may be from suspicious trades. However, it shall consult the relevant authorities in determining what action it shall take when it suspects suspicious trading.
- (k) The circumstances under which the client is permitted to act on behalf of another person / entity shall be clearly laid down. It shall be specified in what manner the account shall be operated, transaction limits for the operation, additional authority required for transactions exceeding a specified quantity/value and other appropriate details. Further the rights and responsibilities of both the persons i.e., the agent- client registered with the intermediary, as well as the person on whose behalf the agent is acting shall be clearly laid down. Adequate verification of a person's authority to act on behalf of the client shall also be carried out.
- (l) Necessary checks and balance to be put into place before opening an account to ensure that the identity of the client does not match with any person having known criminal background or is not banned in any other manner, whether in

- terms of criminal or civil proceedings by any enforcement agency worldwide
- (m) The CDD process shall necessarily be revisited when there is suspicion of money laundering or financing of terrorism (ML/FT).
 - (n) VAMPL/Fund will clearly spell out the client identification procedure to be carried out at different stages i.e while establishing the business- client relationship while carrying out transactions for the client or when it has doubts regarding the veracity or the adequacy of previously obtained client identification data.
 - (o) The client shall be identified by the entity by using reliable sources including documents / information. VAMPL/Fund shall obtain adequate information to satisfactorily establish the identity of each new client and the purpose of the intended nature of the relationship.

7.5 Risk Assessment

- (a) VAMPL/Fund shall carry out risk assessment to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk with respect to its Clients, countries or geographical areas, nature and volume of transactions, payment methods used by Clients, etc.
- (b) The risk assessment shall also take into account:
 - (i) the Client's background;
 - (ii) type of business relationship or transaction; and
 - (iii) any country specific information that is circulated by the Government of India and SEBI, as well as the updated list of individuals and entities who are subjected to sanction measures as required under the various United Nations' Security Council Resolutions.
- (c) The risk assessment carried out shall consider all the relevant risk factors before determining the level of overall risk and the appropriate level and type of mitigation to be applied. The assessment shall be documented, updated regularly and made available to competent authorities and self-regulating bodies, as and when required.

7.6 Additional Requirements for PEPs

- (a) VAMPL/fund shall proactively put in place appropriate risk management systems to determine whether their client or potential client or the beneficial owner of such client is a politically exposed person. Such procedures shall include seeking relevant information from the client, referring to publicly available information or accessing the commercial electronic databases of PEPs.
- (b) VAMPL/Fund shall obtain senior management approval for dealing with PEPs. Further, where a Client has been accepted and the Client or beneficial owner is subsequently found to be, or subsequently becomes a PEP, VAMPL/Fund shall obtain senior management approval to continue the relationship with such Client.
- (c) VAMPL/Fund shall also endeavour to verify the sources of funds as well as the wealth of Clients and beneficial owners identified as PEP.

8. RECORD KEEPING

- (a) VAMPL/Fund shall comply with all record keeping requirements under applicable law (including the SEBI Act, 1992, the PML Act, the SEBI KYC-AML Circulars).
- (b) VAMPL/Fund shall maintain proper record of transactions, including:
 - (i) all cash transactions of the value of more than INR 10,00,000 or its equivalent in foreign currency;
 - (ii) all series of cash transactions integrally connected to each other which have been valued below INR 10,00,000 or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds INR 10,00,000 or its equivalent in foreign currency;
 - (iii) 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 has taken place; and
 - (iv) All suspicious transactions whether or not made in cash as mentioned in the SEBI KYC-AML Circulars.
- (c) VAMPL/Fund shall maintain records that are sufficient to permit reconstruction of individual transactions so as to provide evidence for prosecution of criminal behaviour (if so required), including:
 - (i) the nature of transactions;
 - (ii) the amount of the transaction and the currency in which it is denominated
 - (iii) the date on which the transactions was conducted; and
 - (iv) the parties to the transaction.

9. RETENTION OF RECORDS

All records and information must be retained by VAMPL/Fund for the time periods prescribed in the PML Rules. Currently, this time period is 5 years from the date of the conduct of any transactions with the Client. Where the records relate to ongoing investigations or transactions that are the subject of a suspicious transaction reporting, they shall be retained until the matter is closed. VAMPL/Fund will ensure that the records are maintained in a manner that allows easy and quick retrieval of data as and when requested by the competent authorities, and evidences the identity of Clients and beneficial owners as well as client account files and business correspondence.

10. MONITORING OF TRANSACTIONS

VAMPL/Fund shall monitor transactions with Clients to ensure effectiveness of AML procedures. All documents/office records/memorandums/clarifications sought pertaining to such transactions and purpose thereof must be recorded in writing. Such findings, records and related documents must be made available to auditors, SEBI, stock exchanges and any relevant authorities during any audit or inspection or as and when required.

11. SUSPICIOUS TRANSACTION MONITORING AND REPORTING

- 11.1 All suspicious transactions shall be promptly reported to the Principal Officer in the form of a report with specific reference to the Client, transactions and the nature /reason of suspicion. Whether a transaction is suspicious or not will depend upon the background, details of the transactions and other facts and circumstances. A suspicious transaction (including an attempted transaction) means a transaction, whether made in cash or not, which to a person acting in good faith:
- (a) gives rise to a reasonable ground of suspicion that it may involve proceeds of an offence specified in the Schedule to the PML Act, regardless of the value involved;
 - (b) appears to be made in circumstances of unusual or unjustified complexity; or
 - (c) appears to have no economic rationale or bona fide purpose; or
 - (d) gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism (includes transaction involving funds suspected to be linked or related to, or to be used for terrorism, terrorist acts or by a terrorist, terrorist organisation or those who finance or are attempting to finance terrorism), and includes, without limitation, the following circumstances:
 - (i) Clients whose identity verification seems difficult or clients that appear not to cooperate;
 - (ii) asset management services for Clients where the source of the funds is not clear or not in keeping with Clients' apparent standing/business activity;
 - (iii) Clients based in high risk jurisdictions;
 - (iv) substantial increases in business without apparent cause;
 - (v) Clients transferring large sums of money to or from overseas locations with instructions for payment in cash;
 - (vi) attempted transfer of investment proceeds to apparently unrelated third parties; and
 - (vii) unusual transactions by "Special Category" Clients and businesses undertaken by offshore banks/financial services, businesses reported to be in the nature of export-import of small items.
- 11.2 All suspicious transactions shall be immediately notified by the Principal Officer to the Board or Board delegated committee. The notification may be done in the form of a detailed report with specific reference to the clients, transactions and the nature /reason of suspicion. However, it shall be ensured that there is continuity in dealing with the client as normal until told otherwise and the client shall not be told of the report/ suspicion. In exceptional circumstances, consent may not be given to continue to operate the account, and transactions may be suspended, in one or more jurisdictions concerned in the transaction, or other action taken. The Principal Officer/ Money Laundering Control Officer and other appropriate compliance, risk management and related staff members shall have timely access to client identification data and CDD information, transaction records and other relevant information.
- 11.3 VAMPL/Fund will report all such attempted transactions in STRs, even if not completed by clients, irrespective of the amount of the transaction.
- 11.4 If the board or board delegated Committee considers that such transaction is a suspicious transaction, VAMPL shall report about the suspicious transaction to the Director, Financial Intelligence Unit – India (FIU- IND). Suspicious transactions shall also be regularly reported to the higher authorities within the organisation. The Principal Officer will be responsible for timely submission of the report to FIU-IND. The SEBI AML-KYC Circulars also prescribe that a Client should not be informed about such reporting or suspicion.
- 11.5 VAMPL/Fund shall maintain and preserve the records of information related to transactions, whether attempted or executed, which are reported to the Director, FIU –

- IND, as required under Rules 7 and 8 of the PML Rules, for a period of five years from the date of the transaction between the client and VAMPL/Fund.
- 11.6 VAMPL/Fund shall ensure that all client and transaction records and information are available on a timely basis to the competent investigating authorities. Where required by the investigating authority, it shall retain certain records, e.g. client identification, account files, and business correspondence, for periods which may exceed those required under the SEBI Act, Rules and Regulations framed thereunder PMLA, other relevant legislations, Rules and Regulations or Exchange byelaws or circulars.
- 11.7 VAMPL/Fund shall retain the following information for the accounts of their clients in order to maintain a satisfactory audit trail:
- i. the beneficial owner of the account;
 - ii. the volume of the funds flowing through the account; and
 - iii. for selected transactions:
 - a. the origin of the funds
 - b. the form in which the funds were offered or withdrawn, e.g. cheques, demand drafts etc.
 - c. the identity of the person undertaking the transaction;
 - d. the destination of the funds;
 - e. the form of instruction and authority.
- 11.8 VAMPL/Fund shall also regularly monitor the mentioned in the UN Sanctions list as circulated by SEBI, and if any Clients match the particulars of designated individuals/entities shall inform

full particulars of the funds, financial assets or economic resources or related services held in the form of securities, held by such Client to to SEBI and FIU-IND.

VAMPL/Fund will ensure that accounts are not opened in the name of anyone whose name appears in said UN Sanctions list

VAMPL/Fund continuously scan all existing accounts to ensure that no account is held by or linked to any of the entities or individuals included in the UN Sanctions list.

12. APPOINTMENT OF PRINCIPAL OFFICER AND DESIGNATED DIRECTOR

12.1 Principal officer

VAMPL has appointed the following person as the “Principal Officer” in accordance with the SEBI KYC-AML Circulars. VAMPL will also provide the details of the Principal Officer (including any changes) to the Office of the Director, FIU-IND.

Name: Mr. Soumendra Ghosh

Designation: Chief Investment Officer, Vivriti Asset Management Company Private Limited

Contact number: 77100 30814

E-mail ID: soum@vivritiamc.com

The Principal Officer would act as a central reference point in facilitating onward reporting of suspicious transactions and will play an active role in the identification and assessment of potentially suspicious transactions.

12.2 Designated Director

VAMPL has appointed the following person as the “Designated Director” in accordance with the SEBI KYC-AML Circulars. VAMPL will also provide the details of the Designated Director (including any changes) to the Office of the Director, FIU-IND.

Name: Vineet Sukumar

Designation: Managing Director

Contact number: +91 9500042049

E-mail ID:

vineet@vivriticapital.com

13. TRAINING OF DESIGNATED PERSONNEL/INVESTOR EDUCATION:

All persons concerned with this policy and the due diligence shall attend the training sessions in relation to identifying the money laundering and terrorist financing transaction. Training requirements shall have specific focus on frontline staff, back office staff, compliance staff, risk management staff and staff dealing with new Clients so that the members of the staff are adequately trained in AML and CFT procedures. Such training sessions will be devised based on the role and responsibilities of such persons.

Hiring of Employees:

VAMPL/FUND will have an adequate screening procedures in place to ensure high standards when hiring employees. They shall identify the key positions within their own organization structures having regard to the risk of money laundering and terrorist financing and the size of their business and ensure the employees taking up such key positions are suitable and competent to perform their duties.

Investor Education:

VAMPL/Fund shall prepare specific literature/ pamphlets etc. so as to educate the client of the objectives of the AML/CFT programme.

14. PROCEDURE FOR FREEZING OF FUNDS, FINANCIAL ASSETS OR ECONOMIC RESOURCES OR RELATED SERVICES

1. VAMPL/Fund will follow the order passed by the Central Government dated August 27, 2009 ,order dated March 14, 2019 and order dated February 02, 2021 which details the procedure for the implementation of Section 51A of the Unlawful Activities (Prevention) Act, 1967 (UAPA), relating to the purpose of prevention of, and for coping with terrorist activities was brought into effect through UAPA Amendment Act, 2008.
2. VAMPL/Fund will ensure that they do not have any accounts in the name of individuals/entities appearing in the lists of individuals and entities, suspected of having terrorist links, which are approved by and periodically circulated by the United Nations Security Council (UNSC).

15. LIST OF DESIGNATED INDIVIDUALS/ENTITIES:

- I. VAMPL/Fund shall take note of the list of individuals/entities, from time to time, who are designated as 'Terrorists'by the Ministry of Home Affairs, in pursuance of Section 35(1) of UAPA 1967.
- II. All orders under section 35 (1) and 51A of UAPA relating to funds, financial assets or economic resources or related services, circulated by SEBI from time to time shall be taken note of for compliance.
- III. VAMPL/Fund will ensure that accounts are not opened in the name of anyone whose name appears in the list mentioned below and it shall continuously scan all existing accounts to ensure that no account is held by or linked to any of the entities or individuals included in the list mentioned below.

An updated list of individuals and entities which are subject to various sanction measures such as freezing of assets/accounts, denial of financial services etc., as approved by the Security Council Committee established pursuant to various United Nations' Security Council Resolutions (UNSCRs) can be accessed at its website at <https://press.un.org/en/content/press-release>. The details of the lists are as under:

- i. The "ISIL (Da'esh) & Al-Qaida Sanctions List", which includes names of individuals and entities associated with the Al-Qaida. The updated ISIL & Al-Qaida Sanctions List is available at: <https://www.un.org/securitycouncil/sanctions/1267/press-releases>.
 - ii. The list issued by United Security Council Resolutions 1718 of designated Individuals and Entities linked to Democratic People's Republic of Korea www.un.org/securitycouncil/sanctions/1718/press-releases.
- IV. VAMPL/Fund shall maintain updated designated lists in electronic form and run a check on the given parameters on a regular basis to verify whether the designated individuals/entities are holding any funds, financial assets or economic resources or related services held in the form of securities with them.
 - V. VAMPL/Fund shall also file a Suspicious Transaction Report (STR) with FIU-IND covering all transactions carried through or attempted in the accounts covered under the list of designated individuals/entities under Section 35 (1) and 51A of UAPA.
 - VI. Full details of accounts bearing resemblance with any of the individuals/entities in the list shall immediately be intimated to the Central [designated] Nodal Officer for the UAPA, at Fax No.011-23092551 and also conveyed over telephone No. 011-23092548. The particulars apart from being sent by post shall necessarily be conveyed on email id: jsctcr-mha@gov.in.
 - VII. VAMPL/Fund shall also send a copy of the communication mentioned above to the UAPA Nodal Officer of the State/UT where the account is held and to SEBI and FIU-IND, without delay. The communication shall be sent to SEBI through post and through email (sebi_uapa@sebi.gov.in) to the UAPA nodal officer of SEBI, Deputy General Manager, Division of FATF, Market Intermediaries Regulation and Supervision Department, Securities and Exchange Board of India, SEBI Bhavan II, Plot No. C7, "G" Block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051.
 - VIII. VAMPL/fund shall consider the FATF Statements circulated by SEBI from time to time, and publicly available information, for identifying countries, which do not or insufficiently apply the FATF Recommendations.
 - IX. VAMPL/Fund shall take into account the risks arising from the deficiencies in AML/CFT regime of the jurisdictions included in the FATF Statements. However, it shall be noted that VAMPL/Fund are not precluded from having legitimate trade and business transactions with the countries and jurisdictions mentioned in the FATF statements.

16. REPORTING TO FINANCIAL INTELLIGENCE UNIT-INDIA

- I. In terms of the PML Rules, VAMPL/Fund shall report information relating to cash and suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND) at the following address:

Director, FIU-IND,
Financial Intelligence Unit - India
6th Floor, Tower-2, Jeevan Bharati Building,
Connaught Place, New Delhi-110001, INDIA
Telephone : 91-11-23314429, 23314459
91-11-23319793(Helpdesk) Email:helpdesk@fiuindia.gov.in
(For FINnet and general queries)

ctrcell@fiuindia.gov.in
(For Reporting Entity / Principal Officer registration related queries)
complaints@fiuindia.gov.in
Website: <http://fiuindia.gov.in>

- II. VAMPL/FUND shall adhere to the following, if there is any suspicious transaction
 - i. The Cash Transaction Report (CTR) (wherever applicable) for each month shall be submitted to FIU-IND by 15th of the succeeding month.
 - ii. The Suspicious Transaction Report (STR) shall be submitted within 7 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. The Principal Officer shall record his reasons for treating any transaction or a series of transactions as suspicious. It shall be ensured that there is no undue delay in arriving at such a conclusion.
 - iii. The Principal Officer will be responsible for timely submission of CTR and STR to FIU-IND;
 - iv. Utmost confidentiality shall be maintained in filing of CTR, STR and NTR to FIU-IND.
 - v. No nil reporting needs to be made to FIU-IND in case there are no cash/suspicious/non-profit organization transactions to be reported.
- III. VAMPL/FUND shall not put any restrictions on operations in the accounts where an STR has been made. VAMPL/Fund and their directors, officers and employees (permanent and temporary) shall be prohibited from disclosing (“tipping off”) the fact that a STR or related information is being reported or provided to the FIU-IND. This prohibition on tipping off extends not only to the filing of the STR and/ or related information but even before, during and after the submission of an STR. It shall be ensured that there is no tipping off to the client at any level.
- IV. VAMPL/Fund will file STR if they have reasonable grounds to believe that the transactions involve proceeds of crime irrespective of the amount of transaction and/or the threshold limit envisaged for predicate offences specified in part B of Schedule of PMLA, 2002.

17. POLICY REVIEW

This policy shall be reviewed periodically on such basis and at such times as may be prescribed by the board or board delegated Committee.

LEGEND:

S. NO.	TERM	PARTICULARS
1.	PML Rules	means, collectively, the rules made pursuant to the PML Act (including the Prevention of Money-Laundering (Maintenance of Records Rules), 2005), as amended from time to time.
2.	SEBI KYC-AML Circulars	SEBI circular no. SEBI/ HO/ MIRSD/ DOP/ CIR/ P/ 2019/113 on " <i>Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) /Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under</i> " dated October 15, 2019 (read with The Prevention of Money Laundering Act, 2002 (PML Act)), requires all intermediaries to have a comprehensive policy in relation to anti-money laundering and combating the financing of terrorism (AML). Additionally, post the above master circular, SEBI has from time to time issued few other circulars – SEBI circular dated April 24, 2020 (SEBI/HO/MIRSD/DOP/CIR/P/2020/73), SEBI Circular dated March 10, 2021 (SEBI/HO/MIRSD/DOP/CIR/P/2021/31), SEBI Circular dated April 6, 2022 (SEBI/HO/MIRSD/DoP/P/CIR/2022/46), SEBI Circular dated July 27, 2022 (SEBI/HO/MIRSD/SEC-5/P/CIR/2022/100). VAMPL/Fund has been following the above-mentioned master circular and other circulars as issued by SEBI from time to time for AML/KYC purpose. Other circulars as may be issued from time shall continue to be followed by VAMPL/Fund (each as amended, supplemented, modified or restated from time to time).

ANNEXURE I

PART A: LIST OF PERSONS AUTHORISED TO ATTEST

INDIAN RESIDENT	Notary Public, Gazetted Officer, Manager of a Scheduled Commercial/ Co-operative Bank or Multinational Foreign Banks (Name, Designation & Seal should be affixed on the copy).
NON-RESIDENT INDIAN	Authorized officials of overseas branches of Scheduled Commercial Banks registered in India, Notary Public, Court Magistrate, Judge, Indian Embassy/Consulate General in the country where the client resides are permitted to attest the documents.

PART B: LIST OF DOCUMENTS

CATEGORY	PROOF OF IDENTITY	PROOF OF ADDRESS (*DOCUMENTS HAVING AN EXPIRY DATE SHOULD BE VALID ON THE DATE OF SUBMISSION)
Individual	(a) Unique Identification Number (UID) (Aadhaar)/ Passport/ Voter ID card/ Driving license; and (b) PAN card ¹ with photograph	(a) Passport/ Voters Identity Card/ Ration Card/ Driving License; or (b) Utility bills like Telephone Bill (only land line), Electricity bill or Gas bill - Not more than 3 months old; or (c) Bank Account Statement/Passbook - Not more than 3 months old; or (d) Self-declaration by High Court and Supreme Court judges, giving the new address in respect of their own accounts. (e) Proof of address issued by any of the following: Bank Managers of Scheduled

¹ Exemptions/clarifications to PAN (Sufficient documentary evidence in support of such claims to be collected.)

- (a) In case of transactions undertaken on behalf of Central Government and/or State Government and by officials appointed by Courts e.g. Official liquidator, Court receiver etc.
- (b) Investors residing in the state of Sikkim.
- (c) UN entities/multilateral agencies exempt from paying taxes/filing tax returns in India.
- (d) SIP of Mutual Funds upto Rs 50, 000/- p.a.
- (e) In case of institutional clients, namely, FIIs, MFs, VCFs, FVCI, Scheduled Commercial Banks, Multilateral and Bilateral Development Financial Institutions, State Industrial Development Corporations, Insurance Companies registered with IRDA and Public Financial Institution as defined under section 4A of the Companies Act, 1956, Custodians shall verify the PAN card details with the original PAN card and provide duly certified copies of such verified PAN details to the intermediary.

		<p>Commercial Banks/Scheduled Co-Operative Bank/Multinational Foreign Banks/Gazetted Officer/Notary public/Elected representatives to the Legislative Assembly/Parliament/Documents issued by any Govt. or Statutory Authority.</p> <p>(f) Identity card/document with address, issued by any of the following: Central/State Government and its Departments, Statutory/Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions, Colleges affiliated to Universities and Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members.</p> <p>(g) For FII/sub account, Power of Attorney given by FII/sub-account to the Custodians (which are duly notarized and/or apostiled or consularised) that gives the registered address should be taken.</p> <p>(h) The proof of address in the name of the spouse may be accepted.</p>
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In case of non-individuals, following documents are to be obtained:

TYPE OF ENTITY	LIST OF DOCUMENTS
Corporate	<ul style="list-style-type: none"> (a) Copy of the audited (if applicable) balance sheets for the last 2 financial years (to be submitted every year). (b) Copy of latest share holding pattern including list of all those holding control, either directly or indirectly, in the company in terms of SEBI takeover Regulations, duly certified by the company secretary/Whole time director/MD (to be submitted every year). (c) Photograph, Proof of Identity, Proof of Address, PAN and DIN numbers of whole time directors/two directors in charge of day to day operations. (d) Photograph, Proof of Identity, Proof of Address, PAN of individual promoters holding control - either directly or indirectly. (e) Copies of the Memorandum and Articles of Association and certificate of incorporation. (f) Copy of the Board Resolution for investment in in securities market including alternative investment fund. (g) Authorised signatories list with specimen signatures.
Partnership firm	<ul style="list-style-type: none"> (a) Copy of the audited (if applicable) balance sheets for the last 2 financial years (to be submitted every year). (b) Certificate of registration (for registered partnership firms only). (c) Copy of partnership deed. (d) Authorised signatories list with specimen signatures. (e) Photograph, Proof of Identity, Proof of Address, PAN of Partners. (f) Copy of the Resolution for investment in Fund.
Trust	<ul style="list-style-type: none"> (a) Copy of the audited (if applicable) balance sheets for the last 2 financial years (to be submitted every year). (b) Certificate of registration (for registered trust only). (c) Copy of registered Trust deed. (d) List of trustees certified by managing trustees/CA. (e) Photograph, Proof of Identity, Proof of Address, PAN of Trustees (f) Copy of the Resolution/authorisation for investment in Fund.
HUF	<ul style="list-style-type: none"> (a) PAN of HUF. (b) Deed of declaration of HUF/ List of coparceners. (c) Bank pass-book/bank statement in the name of HUF. (d) Photograph, Proof of Identity, Proof of Address, PAN of Karta. (e) Copy of the authorisation for investment in Fund on behalf of HUF.

Unincorporated association or a body of individuals	(a) Proof of existence/constitution document. (b) Resolution of the managing body & Power of Attorney granted to transact business on its behalf. (c) Authorized signatories list with specimen signatures along with their Photograph, Proof of Identity, Proof of Address, PAN.
Banks/Institutional Investors	(a) Copy of the constitution/registration (b) Audited annual report/balance sheet for the last 2 financial years. (c) Authorized signatories list with specimen signatures (d) Photograph, Proof of Identity, Proof of Address, PAN of individual promoters holding control - either directly or indirectly. (e) Copy of the authorisation on the letter head for making investment in Fund.
Foreign Institutional Investors (FII)	(a) Copy of SEBI registration certificate. (b) Authorized signatories list with specimen signatures. (c) Copy of the Resolution/authorisation for investment in Fund.
Army/ Government Bodies	(a) Self-certification on letterhead. (b) Authorized signatories list with specimen signature
Registered Society	(a) Copy of Registration Certificate under Societies Registration Act. (b) List of Managing Committee members.
	(c) Committee resolution for persons authorised to act as authorised signatories with specimen signatures. (d) True copy of Society Rules and Bye Laws certified by the Chairman/Secretary.

IMPORTANT NOTES:

1. Self-attested copy of PAN card is mandatory for all clients, including Promoters/Partners/Karta/Trustees and whole-time directors and persons authorized to deal in securities on behalf of company/firm/others.
2. Copies of all the documents submitted by the applicant should be self-attested and accompanied by originals for verification. In case the original of any document is not produced for verification, then the copies should be properly attested by entities authorized for attesting the documents, as per the below mentioned list.
3. If any proof of identity or address is in a foreign language, then translation into English is required.
4. Name & address of the applicant mentioned on the KYC form, should match with the documentary proof submitted.
5. If correspondence & permanent address are different, then proofs for both have to be

submitted.

6. Sole proprietor must make the application in his individual name & capacity.
7. For non-residents and foreign nationals, (allowed to trade subject to RBI and FEMA guidelines), copy of passport/PIO Card/OCI Card and overseas address proof is mandatory.
8. For foreign entities, CIN is optional; and in the absence of DIN no. for the directors, their passport copy should be given.
9. In case of Merchant Navy NRI's, Mariner's declaration or certified copy of CDC (Continuous Discharge Certificate) is to be submitted.
10. Politically Exposed Persons (PEP) are defined as individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior Government/judicial/ military officers, senior executives of state- owned corporations, important political party officials, etc.

ANNEXURE III
IDENTIFICATION OF BENEFICIAL OWNERSHIP

TYPE OF CLIENT	PROCEDURE
Trust	Where the client is a trust, VAMPL/Fund shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the identity of the settler of the trust, the trustee, the protector, the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.
Persons other than individuals and trusts (being company, partnership or unincorporated association/body of individuals)	<p>(a) The identity of the natural person, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest. <i>("Controlling ownership interest" means ownership of/entitlement to:</i></p> <p style="margin-left: 40px;"><i>(i) more than 25% of shares or capital or profits of the juridical person, where the juridical person is a company;</i></p> <p style="margin-left: 40px;"><i>(ii) more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership; or;</i></p> <p style="margin-left: 40px;"><i>(iii) more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.)</i></p> <p>(b) In cases where there exists doubt under clause (a) above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity of the natural person exercising control over the juridical person through other means (such as through voting rights, agreement, arrangements or in any other manner).</p> <p>(c) Where no natural person is identified under clauses (a) or (b) above, the identity of the relevant natural person who holds the position of senior managing official.</p> <p>Exemption in case of listed companies: Where the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.</p>

ANNEXURE IV Client Categorization

Risk Category	Clients
<p>Low Risk</p>	Non - resident Clients
	High net-worth Clients
	Trust, Charities, Non-Governmental Organizations (NGOs) and organizations receiving donations.
	Companies having close family shareholdings or beneficial ownership.
<p>High Risk</p>	<p>Politically Exposed Persons (PEP) are individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior government/judicial/military officers, senior executives of state- owned corporations, important political party officials, etc.</p>
	Companies offering foreign exchange offerings
	<p>Clients in high risk countries where existence / effectiveness of money laundering controls is suspect, where there is unusual banking secrecy, countries active in narcotics production, countries where corruption (as per Transparency International Corruption Perception Index) is highly prevalent, countries against which government sanctions are applied, countries reputed to be any of the following – Havens/ sponsors of international terrorism, offshore financial centers, tax havens, countries where fraud is highly prevalent. While dealing with Clients in high risk countries where the existence/effectiveness of money laundering control is suspect, intermediaries apart from being guided by the Financial Action Task Force (FATF) statements that identify countries that do not or insufficiently apply the FATF Recommendations, published by the FATF on its website (www.fatf-gafi.org), shall also independently access and consider other publicly available information.</p>

	Non face to face Clients
	Clients with dubious reputation as per public information available etc.
	Clients operating in a Financial Action Task Force (FATF) non-compliant jurisdiction.
	Clients mentioned in the UN Sanctions list as circulated by SEBI.

VAMPL\Fund will apply higher due diligence measures keeping in view the risk level. The extent of due diligence requirement will vary from case to case as the same will depend upon risk perceived by the Company\Fund.