

## **Customer Acceptance Policy (CAP)**

Accept only those clients whose identity is established by conducting due diligence appropriate to the risk profile of the client.

- Where the investor is a new investor, account must be opened only after ensuring that pre account opening KYC documentation and procedures are conducted - documents as per standard norms to be collected - identity verification of the client to be made through support desk VLSF will follow the industry standard in implementing the procedure for KYC.
- Any transaction from a client may be accepted only after Customer acceptance procedure is completed. However, Customer acceptance procedure and Transaction acceptance procedure may be initiated simultaneously in case of low risk customers. If Customer acceptance procedure rejects a customer and customer does not respond to requests for additional information, the account opening will be rejected. A suitable condition may be incorporated in the account opening/transaction request form to this effect.
- The Clients are introduced in the system through recognized partners or mutual fund partners or relationship managers or any known identity.

### **Know your client standards – identification of customer:**

- a. Identity generally means a set of attributes which together uniquely identifies a natural or a legal person and in case of legal person its beneficial owner (natural person). An individual's identity comprises his/her name recent photograph, signature, date of birth, and the residential address at which he/she can be located. In case of non-individuals, identification is established with the help of registration number, copies of incorporation documents, location, address of head office / registered office and identity of authorized signatories.
- b. Identification evidence is verified for:
  - ❖ The named account holder(s)/the person in whose name an investment is registered;
  - ❖ Any principal beneficial owner of funds being invested who is not the account holder or named investor;
  - ❖ Power of Attorney holders.
  - ❖ The failure or refusal by an applicant/customer falling under high-risk category to provide satisfactory identification evidence within 30 days of seeking information and/or without adequate explanation may lead to a suspicion that the investor is engaged in money laundering. In such circumstances, Principal officer may consider making a suspicious activity report.

### **Guidelines on Identification of beneficial Ownership**

For clients other than individuals or trusts:

Where the client is a person other than an individual or trust, viz., company, partnership or unincorporated association/body of individuals, the intermediary shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the following information:

- 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.

Explanation: Controlling ownership interest means ownership of/entitlement to:

- i. more than 25% of shares or capital or profits of the juridical person, where the juridical person is a company;
  - ii. more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership; or
  - 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.
- b. In cases where there exists doubt under clause 4 (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.

Explanation: Control through other means can be exercised through voting rights, agreement, arrangements or in any other manner.

- c. Where no natural person is identified under clauses 4 (a) or 4 (b) above, the identity of the relevant natural person who holds the position of senior managing official.

For client which is a trust:

Where the client is a trust, the intermediary 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.

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.

A risk-based approach will be adopted towards certification of documents. For low risk clients, reliance will be placed on a self-certified copy of the documents required to prove identity and address. For high-risk clients, the copies of identification documents have to be attested by government gazetted officers or notarised by a public notary or by any other person who has opened an account with VLSF after adhering to KYC norms stipulated under this policy. Where the beneficial owner is a well established entity like religious trust/endowment board registered as such with any government authority, educational trust having a standing of not less than 10 years and good reputation in the

locality where it is situated, recognised Nongovernment organisation, companies listed on recognized stock exchanges, SEBI registered intermediary, IRDA registered insurance company or insurance intermediary, pension fund registered under appropriate authority, SEBI recognised stock exchange, scheduled commercial bank, government departments, government agencies, statutory bodies, public sector undertakings and such other entities of irrefutable reputation the documentation for establishing identification include certified true copies of Memorandum and Articles of Association and Certificate of Incorporation. However, identification of the authorised signatory shall be on the lines of low risk individual customers.

### c. Customer Identification Procedure

**Pre-account Opening:** The submission of all documents required under this policy is a prerequisite for account opening for all customers. Incomplete application (including incomplete documentation) is to be rejected. VLSF will follow the industry standard for implementing customer identification procedure. However, proof of identity and address proof will be verified based on documentation provided. In case there is a deviation from the above then the approval of any senior person or management shall be taken and the process shall be completed.

#### Investigative Red Flags

- . **Cash Transactions:** VLSF does not accept cash for any investment nor does it pay cash towards any redemption or refunds. Therefore, instances of suspicion on the grounds of cash transaction are not expected.
- . **Pay orders / Demand Drafts incoming payments:** All investments through pay orders/ demand drafts of Rs. 50,000 or more will require a declaration from the customer that the source of funds is legitimate or any other proof as specified under circulars issued by SEBI / Exchanges from time to time. If the amount paid through pay order/demand draft is Rs 50,000 or more, procedure given under suspicious transactions may be followed if there is no supporting received for the same.
- . **Third Party incoming payments issued in India:** If the cheque towards investment is issued by a payer other than the account holder or one of the account holders in case of joint account, the following procedure shall be followed: Discourage accepting third party cheques. However, the third party cheque is towards investment by minor or dependent member of the family viz., wife, son or daughter, father, mother, brother or sister, such third party payments may be accepted if declaration to that effect is made in the application form. Further, obtain a declaration from the customer confirming that the source of funds for the payment is legitimate. If no declaration is given, the transaction will be rejected.

#### Transactions that do not make economic sense

- ❖ Using multiple client codes for trading for same client,
- ❖ Frequent churning of particular scripts to generate volume in the script.
- . **Attempts to avoid Reporting / Record Keeping requirements:**

- ❖ Investors reluctant to provide information,
- ❖ Investor induces the Company not to file any report / forms,

. **Unusual Activities:**

- ❖ Any unusual requests like not-sending of account statements,
- ❖ Very large number of bank accounts,
- ❖ Sudden surge in activity level,
- ❖ Inoperative accounts for more than 12 months becoming active suddenly,
- ❖ Frequent change of bank mandates / address i.e., three or more changes in six months.

. **Customer who provides insufficient information:**

- ❖ Information / Additional information requested but not forthcoming (within 30 days or request) in relation to transactions with the Company.
- ❖ Frequent “Returned Undelivered” status on communications to investor; 5 or more in a calendar year.

. **Certain Suspicious Funds Transfer Activities**

- ❖ Inward Wire transfer from overseas – which is not supported by adequate declarations,
- ❖ Country of Inward Wire Transfers differing from Country mentioned in bank mandates,
- ❖ Bank mandates mentioned in high risk and moderate risk countries All customers, channel partners and distributors are requested to understand the policy on KYC standards and AML measures and cooperate with VLSF in implementing these measures.

**Review**

The Company conducts a periodic review of the policy. In case of amendment in statutory provisions/ regulations necessitating amendment, the relevant portions of policy shall be deemed to have been modified from the date of amendment in relevant statutory provisions. In such case the modified policy shall be placed for review by the Board in regular course.