KYC & AML Policy

Overview

At **Instant Rupiya**, we are committed to preventing money laundering, terrorist financing, fraud, identity theft, and other financial crimes. We have implemented a robust Know Your Customer (KYC) and Anti-Money Laundering (AML) framework in accordance with applicable laws, RBI guidelines, the Prevention of Money Laundering Act (PMLA), and other regulatory requirements.

Our KYC and AML framework enables us to verify customer identity, assess risks, monitor transactions, and maintain a secure lending environment.

Purpose

The objectives of this Policy are to:

- Verify the identity of every customer before establishing a lending relationship.
- Prevent misuse of our platform for money laundering, fraud, terrorist financing, or other unlawful activities.
- Comply with applicable regulatory requirements.
- Protect customer interests and maintain the integrity of our financial services.
- Promote safe, transparent, and responsible lending practices.

Scope

This Policy applies to all customers applying for financial products or services offered through **Instant Rupiya**.

It covers:

- Customer Identification
- Customer Due Diligence (CDD)
- Enhanced Due Diligence (EDD), where applicable
- Risk Categorization
- Transaction Monitoring
- Record Maintenance
- Regulatory Reporting

Customer Identification (KYC)

Before processing any loan application, **Instant Rupiya** verifies the identity of every applicant using officially valid documents and other legally permitted verification methods.

Depending on regulatory requirements and the nature of the transaction, verification may include:

- Aadhaar-based verification (where permitted by law)
- PAN verification
- Officially Valid Documents (OVDs)
- Video-based Customer Identification Process (V-CIP), wherever applicable
- Mobile number verification
- Bank account verification
- Selfie or facial verification, where applicable
- Other verification methods permitted under applicable regulations

Loan applications may be declined if satisfactory identity verification cannot be completed.

Customer Acceptance

Instant Rupiya shall not establish a lending relationship where:

- The applicant provides false, misleading, incomplete, or unverifiable information.
- The identity of the applicant cannot be satisfactorily established.
- The applicant appears on any government or regulatory sanctions list.
- There is reasonable suspicion of fraud, money laundering, terrorist financing, or other unlawful activities.
- Regulatory requirements cannot be fulfilled.

Every customer is treated fairly and without discrimination while ensuring compliance with applicable laws.

Risk-Based Approach

Customers are assessed using a risk-based approach considering factors such as:

- Identity verification
- Credit profile
- Occupation or business
- Source of income
- Geographic location
- Nature of transactions
- Regulatory risk indicators

Based on the assessment, customers may be classified into different risk categories, and additional due diligence may be carried out where necessary.

Transaction Monitoring

To maintain the security and integrity of our platform, **Instant Rupiya** continuously monitors transactions for unusual or suspicious activity.

Examples include:

- Unusual repayment behaviour
- Transactions inconsistent with the customer's profile
- Multiple transactions indicating possible structuring
- Suspected fraudulent activities
- Any activity required to be reported under applicable laws

Where required, such transactions may be reviewed, investigated, or reported to the appropriate regulatory authorities.

Politically Exposed Persons (PEPs)

Applications involving Politically Exposed Persons (PEPs) or other higher-risk customers may be subject to enhanced due diligence in accordance with applicable regulatory requirements.

Record Retention

KYC records, customer information, and transaction records shall be maintained for the period prescribed under applicable laws and regulatory guidelines.

All customer information is stored securely and accessed only by authorized personnel.

Privacy & Confidentiality

Customer information collected during the KYC process is handled securely and confidentially.

Information may be shared only:

- Where required by law;
- With regulators, law enforcement agencies, or government authorities;
- For fraud prevention, risk management, or regulatory compliance; or
- With authorized service providers engaged for lawful business purposes.

For more information, customers may refer to our Privacy Policy.

Customer Responsibilities

Customers are expected to:

- Provide accurate and complete information.
- Submit valid identity and address documents when requested.
- Cooperate during KYC verification and periodic updates.
- Promptly notify us of any changes to their personal information.

Failure to provide the required information may result in rejection of the application, suspension of services, or closure of the lending relationship, as permitted by law.

Compliance

Instant Rupiya maintains appropriate systems, controls, and internal procedures to ensure compliance with applicable KYC, AML, and Counter-Terrorist Financing (CTF) regulations.

Employees receive periodic training, and internal controls are regularly reviewed to ensure ongoing compliance.

Policy Review

This KYC & AML Policy is reviewed periodically and may be amended from time to time to reflect changes in applicable laws, regulatory requirements, technology, or business practices.