23 Finverse Know Your Customer (KYC) & Anti-Money Laundering (AML) Policy

Effective Date: [Insert Date]
Last Updated: [Insert Date]

1. Purpose

23 Finverse ("Company", "we", "our", or "us") is committed to preventing money laundering, terrorist financing, fraud, identity theft, and other financial crimes. This Know Your Customer (KYC) & Anti-Money Laundering (AML) Policy ("Policy") establishes the framework for identifying customers, assessing risks, monitoring transactions, and complying with applicable laws and regulatory requirements.

This Policy applies to all employees, directors, consultants, Channel Partners (CPs), Distributor Partners (DPs), Referral Partners, contractors, vendors, and any individual acting on behalf of 23 Finverse.

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2. Regulatory Framework

This Policy is designed to support compliance with applicable Indian laws and regulations, including:

- Prevention of Money Laundering Act, 2002 (PMLA).
- Prevention of Money Laundering (Maintenance of Records) Rules.
- Directions and guidelines issued by the Reserve Bank of India (RBI), Securities and Exchange Board of India (SEBI), Insurance Regulatory and Development Authority of India (IRDAI), or other applicable regulators, where relevant.
- Applicable sanctions, anti-fraud, and financial crime regulations.

Where 23 Finverse acts as a technology service provider or distributor, KYC and AML obligations may also be governed by the requirements of the regulated financial institution or principal entity.

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3. Customer Identification (KYC)

Before providing regulated products or services, 23 Finverse may conduct customer identification and verification using risk-based procedures.

The Company may collect and verify, where applicable:

Individual Customers

- Full name.
- Date of birth.
- Residential address.
- Mobile number.
- Email address.
- Permanent Account Number (PAN), where required.
- Officially Valid Documents (OVDs), as permitted by applicable law.
- Photograph or biometric verification, where applicable.

Business Customers

- Legal entity name.
- Registration or incorporation details.
- Registered office address.
- PAN and tax registration details.
- Authorized signatory information.
- Ultimate Beneficial Ownership (UBO) details, where required.
- Business activity and ownership information.

The Company reserves the right to request additional documentation where necessary to complete customer due diligence.

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4. Politically Exposed Persons (PEPs)

Customers identified as Politically Exposed Persons (PEPs), their immediate family members, or close associates may be subject to Enhanced Due Diligence (EDD).

Additional measures may include:

- Senior management approval before onboarding or continuing the relationship.
- Enhanced identity verification.
- Source of funds and source of wealth verification, where appropriate.
- Increased transaction monitoring.
- Periodic review of the customer relationship.

PEP status does not automatically prohibit onboarding but may require additional risk assessment.

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5. Sanctions Screening

23 Finverse may screen customers, beneficial owners, authorized representatives, and transactions against applicable sanctions lists and watchlists, as required by law or contractual obligations.

Where a match or potential match is identified, the Company may:

- Conduct further verification.
- Delay or suspend onboarding or transactions.
- Request additional information.
- Decline or terminate the relationship where legally required.
- Report the matter to the appropriate authorities or regulated entity, where applicable.

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6. Fraud Detection and Prevention

23 Finverse employs risk-based controls to identify and prevent fraudulent activity.

Fraud prevention measures may include:

- Identity verification.
- Device and IP monitoring.
- Transaction pattern analysis.
- Duplicate account detection.
- Behavioural analytics.
- Verification of supporting documentation.
- Monitoring unusual account activity.

Where fraud is suspected, the Company may temporarily suspend accounts or transactions while investigations are conducted.

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7. Suspicious Transactions

Employees and authorized representatives must promptly report any transaction or activity that appears unusual, inconsistent, or suspicious.

Examples include:

- Transactions lacking an apparent legitimate purpose.

- Unusual payment patterns.
- Attempts to avoid identification procedures.
- Use of false or misleading information.
- Frequent reversals or cancellations without reasonable explanation.
- Transactions inconsistent with the customer's profile.
- Suspected identity theft or account takeover.
- Activity suggesting money laundering, terrorist financing, fraud, or other financial crime.

The Company shall investigate such activity and, where required by law or applicable regulatory obligations, report it to the appropriate regulated entity or competent authority.

Customers shall not be informed where reporting is prohibited by law.

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8. Record Keeping

23 Finverse shall maintain appropriate records relating to:

- Customer identification documents.
- Verification records.
- Account information.
- Transaction records.
- Risk assessments.
- Internal investigations.
- Compliance reviews.
- Communications relating to KYC and AML matters.

Records shall be retained for the period prescribed by applicable laws, regulations, contractual obligations, or internal retention policies.

Records shall be stored securely and protected against unauthorized access, alteration, or destruction.

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9. Cooperation with Banks and Regulated Financial Institutions

Where 23 Finverse partners with banks, Non-Banking Financial Companies (NBFCs), payment institutions, insurers, mutual fund distributors, or other regulated entities, the Company shall cooperate in meeting applicable KYC and AML obligations.

Such cooperation may include:

- Sharing customer documentation, where legally permissible.
- Supporting customer verification.
- Assisting with regulatory or compliance reviews.
- Facilitating transaction monitoring.
- Responding to lawful information requests.
- Participating in fraud prevention initiatives.

Information shall be shared only in accordance with applicable law, contractual obligations, and the Company's Privacy Policy.

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10. Partner Responsibilities

Channel Partners (CPs), Distributor Partners (DPs), Referral Partners, agents, and other authorized representatives shall:

- Follow all applicable KYC and AML requirements.
- Verify customer information accurately.
- Avoid assisting customers in circumventing identification procedures.
- Report suspected fraud or suspicious activity immediately.
- Maintain confidentiality of customer information.
- Cooperate with compliance reviews and audits.
- Complete mandatory compliance training where required.
- Maintain accurate records relating to customer onboarding activities.

Failure to comply with this Policy may result in suspension, termination, recovery of losses, or reporting to competent authorities where appropriate.

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11. Employee Responsibilities

All employees shall:

- Complete periodic KYC and AML training.
- Understand and comply with this Policy.
- Escalate suspicious activities without delay.
- Protect confidential customer information.
- Cooperate with internal audits and investigations.
- Avoid assisting any customer in evading legal or regulatory requirements.

Employees shall not knowingly facilitate money laundering, terrorist financing, fraud, or other unlawful activities.

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12. Monitoring and Review

23 Finverse shall periodically review its KYC and AML controls to ensure they remain effective and proportionate to the risks associated with its products, services, customers, and business operations.

The Company may update this Policy to reflect changes in applicable laws, regulatory guidance, business practices, or emerging financial crime risks.

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13. Non-Compliance

Failure to comply with this Policy may result in disciplinary or contractual action, including:

- Additional training.
- Written warnings.
- Suspension of access or responsibilities.
- Termination of employment or partnership.
- Recovery of losses where applicable.
- Reporting to regulatory or law enforcement authorities, where required by law.

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14. Contact Information

For questions regarding this Policy or to report suspicious activity, please contact:

23 Finverse

Compliance Team: compliance@23finverse.com

AML/KYC Officer: aml@23finverse.com

Customer Support: support@23finverse.com

Registered Office: 5th Floor Esplande One Mall Rasulgarh Bhubaneswar Odisha 751010