CICAGO COMMODITIES PRIVATE LIMITED
CIN: U51109WB1994PTC062076 · RBI CoR: B-05.03699 · Non-deposit taking NBFC-ICC (Base Layer)
Registered Office: Office No. 214, 2nd Floor, Siddha Weston, 9 Weston Street, Kolkata – 700013

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KNOW YOUR CUSTOMER (KYC) AND ANTI-MONEY LAUNDERING (AML) POLICY

Table of Contents

1. Preamble

This Policy sets out the framework adopted by Cicago Commodities Private Limited ("the Company") to know its customers, prevent the Company from being used, intentionally or

Cicago Commodities Pvt. Ltd.

unintentionally, for money laundering or terrorist financing, and comply in full with the applicable KYC/AML framework. It is built on the four pillars prescribed by the Reserve Bank of India: Customer Acceptance Policy; Risk Management; Customer Identification Procedures; and Monitoring of Transactions.

2. Regulatory Framework

This Policy is framed pursuant to: the RBI Master Direction – Know Your Customer (KYC) Direction, 2016, as amended; the Prevention of Money-Laundering Act, 2002 ("PMLA") and the PML (Maintenance of Records) Rules, 2005; the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016, to the extent applicable; and orders issued under the Unlawful Activities (Prevention) Act, 1967 and the Weapons of Mass Destruction Act, 2005 relating to sanctions lists.

3. Objectives

To ensure that: every customer is accepted and serviced only after identity and, where required, beneficial ownership are established through reliable, independent documents and sources; the Company's exposure to money laundering, terrorist financing and proliferation financing risk is identified, assessed and mitigated; suspicious activity is detected and reported; and records are maintained as required by law.

4. Definitions

Terms used in this Policy including "customer", "beneficial owner", "officially valid document" ("OVD"), "customer due diligence" ("CDD"), "Politically Exposed Person" ("PEP"), "suspicious transaction" and "equivalent e-document" carry the meanings assigned in the RBI KYC Master Direction and the PMLA framework.

5. Customer Acceptance Policy

5.1 No account-based relationship shall be established, and no facility sanctioned, without completion of CDD as per this Policy.
5.2 No relationship shall be established in a fictitious or benami name, or in anonymous form.
5.3 No relationship shall be established where the Company is unable to verify identity or obtain required documents owing to non-cooperation or non-reliability of documents, and termination of an existing relationship shall be considered in such cases after due notice.
5.4 No relationship shall be established with a person whose name appears in the applicable sanctions lists (Section 15).
5.5 Necessary checks shall be conducted before establishing a relationship so as to ensure that the identity of the customer does not match any person with a known criminal background or banned entity.
5.6 The Customer Acceptance Policy shall not result in denial of services to the general public, especially those who are financially or socially disadvantaged.

Cicago Commodities Pvt. Ltd.

6. Risk Management and Customer Risk Categorisation

6.1 Every customer is categorised as **Low**, **Medium** or **High** risk based on, inter alia: nature of business and business activity; customer profile and location; mode of establishment of the relationship; nature and value of transactions; whether the customer or beneficial owner is a PEP; and any adverse information.
6.2 Risk categorisation is reviewed periodically and on trigger events.
6.3 The extent of due diligence and monitoring is calibrated to the risk category: enhanced due diligence for High risk (including senior management approval for PEP relationships), standard CDD for Medium, and simplified measures where permitted for Low.
6.4 The Company conducts an internal ML/TF risk assessment covering its products, services, customers and geographies, which is documented and placed before the Board annually.

7. Customer Identification Procedure

Identity is established: at the commencement of an account-based relationship; when carrying out any transaction requiring CDD under the PML Rules; when there is doubt about the authenticity or adequacy of previously obtained identification data; and at such other times as required by the KYC Master Direction.

8. Customer Due Diligence

8.1 Individuals (including proprietors, partners, directors, authorised signatories and beneficial owners): certified copy or equivalent e-document of an OVD containing identity and address, the Permanent Account Number or Form 60, and a recent photograph; verification through permitted modes including offline Aadhaar verification and digital KYC as applicable.
8.2 Sole proprietorships: CDD of the proprietor plus any two prescribed documents in the name of the firm evidencing business activity (e.g. registration certificate, GST registration, IT returns, utility bills).
8.3 Companies: certificate of incorporation; memorandum and articles; PAN of the company; board resolution and power of attorney for authorised officials; and CDD of authorised signatories and beneficial owners.
8.4 Partnership firms and LLPs: registration certificate; partnership deed / LLP agreement; PAN; and CDD of authorised persons and beneficial owners.
8.5 Trusts and other entities: documents prescribed for the relevant entity type under the KYC Master Direction.
8.6 Where the customer has undergone KYC with another regulated entity, reliance on third-party due diligence and CKYCR records is permitted subject to the conditions in the Master Direction, with ultimate responsibility remaining with the Company.

9. Beneficial Ownership

For every customer that is not a natural person, the beneficial owner(s) shall be identified and reasonable steps taken to verify their identity, applying the ownership/control thresholds prescribed under the PML Rules (including controlling ownership interest of the

Cicago Commodities Pvt. Ltd.

prescribed percentage for companies and partnerships), and where no natural person is identified through ownership or control, the relevant natural person holding the position of senior managing official.

10. Ongoing Due Diligence and Monitoring

10.1 Transactions are monitored to ensure consistency with the customer's known profile, business, and risk category, with attention to complex, unusually large, or unusual patterns of transactions with no apparent economic rationale.
10.2 Internal threshold and pattern triggers appropriate to the Company's wholesale/secured lending business are maintained by the Principal Officer, and alerts are examined and dispositioned with documented rationale.
10.3 High-risk relationships are subject to enhanced monitoring and more frequent review.

11. Periodic Updation of KYC

KYC records are updated at least once in five years for High risk, eight years for Medium risk and ten years for Low risk customers from the date of opening of the account / last updation, through the modes permitted by the Master Direction, including self-declaration of no change in respect of address where applicable.

12. Record Management

The Company maintains: records of all transactions required under the PMLA for at least five years from the date of the transaction; identification records and account files for at least five years after the end of the business relationship; and makes them available to competent authorities on request. Records of the nature and value of prescribed transactions (including cash transactions above thresholds, series of connected cash transactions, and suspicious transactions) are preserved as required under the PML Rules.

13. Central KYC Records Registry

KYC records of eligible customers are uploaded to, and retrieved from, the Central KYC Records Registry (CKYCR) in the manner and within the timelines prescribed, using the applicable templates.

14. Sanctions Screening

Customers and beneficial owners are screened at onboarding and on an ongoing basis against the UNSC sanctions lists and designations notified under UAPA/WMD orders as circulated by RBI/FIU-IND. On a confirmed match, the Company shall not enter into or shall freeze the relationship as required, and shall report as prescribed.

15. Designated Director and Principal Officer

The Board has designated:
Designated Director (PMLA):
Name – Amol Kothadiya

Cicago Commodities Pvt. Ltd.

Principal Officer:
Name - Shital Agarwal
responsible for compliance with this Policy, monitoring, regulatory reporting to FIU-IND, and liaison with authorities.
Their particulars are communicated to FIU-IND as required.

17. Employee Training and Hiring

Adequate screening is applied as part of hiring, and employees are trained on KYC/AML requirements relevant to their roles, with refresher training at reasonable intervals. Front-line, credit and compliance staff receive role-specific modules.

18. Secrecy and Customer Confidentiality

Information collected for KYC is treated as confidential, used only for the purpose for which it is collected, and not divulged except as permitted by law.

19. Review

This Policy is reviewed by the Board annually and upon any material amendment to the KYC Master Direction, the PMLA framework, or the Company's business profile.

Cicago Commodities Pvt. Ltd.