

Know Your Customer (KYC) Policy

1. Our Commitment: Integrity in Every Connection

- 1.1. Satyam Finlease Private Limited ("SFPL" or "the Company" or "Quince Capital") is a non-deposit taking NBFC committed to the highest standards of ethical and legal conduct.. We implement these KYC and Anti-Money Laundering (AML) guidelines to ensure we know our customers well and protect our systems from being used for unscrupulous activities. This policy is built on the benchmarks set by the RBI and the Prevention of Money Laundering Act (PMLA), 2002.

2. Key Elements of Our Policy

- 2.1. We manage risk through five core pillars
 - 2.1.1. **Customer Acceptance Policy:** Ensuring we only welcome legitimate partners
 - 2.1.2. **Customer Identification Procedures (CIP):** Verifying who you are using reliable sources
 - 2.1.3. **Customer Due Diligence (CDD):** Understanding your background and financial status
 - 2.1.4. **Monitoring of Transactions:** Keeping a pulse on account activity
 - 2.1.5. **Risk Management:** Categorizing relationships to apply the right level of oversight

3. Welcoming New Customers

- 3.1. **Physical Verification:** No account is opened without a physical visit by a Quince Capital representative to your address to confirm residency
- 3.2. **Mandatory Cooperation:** We cannot open an account if adequate documentation isn't provided or if the CDD process cannot be satisfactorily completed
- 3.3. **Mandatory PAN:** PAN is compulsory for loan applicants and will be verified through the issuing authority. Form 60 may be accepted for co-applicants.
- 3.4. **Zero Tolerance:** Quince Capital checks all applicants against national and international blacklists before acceptance

4. Understanding Beneficial Ownership

- 4.1. We identify the actual natural persons who control an entity
 - 4.1.1. **Companies:** Anyone owning more than 10% of shares/capital or exercising management control
 - 4.1.2. **Partnerships:** Any partner with more than 10% entitlement to capital or profits
 - 4.1.3. **Unincorporated Bodies/ Societies:** Natural persons with more than 15% interest in property or capital
 - 4.1.4. **Trusts:** Identification of the author, trustee, and beneficiaries with 15% or more interest

5. Verification Methods

- 5.1. We utilize three primary ways to verify your documents:

- 5.1.1. **Digital KYC:** An SFPL employee captures live photographs of your original documents and confirms details in your presence
- 5.1.2. **E-KYC:** Verifying documents online directly through issuing authorities
- 5.1.3. **Physical KYC:** Photocopies are self-attested by you and countersigned by a Quince Capital employee as "Original Seen and Verified"

6. Risk Management

- 6.1. Every customer is assigned a risk level based on a score from 1–10
 - 6.1.1. **Low Risk:** Score greater than or equal to 10
 - 6.1.2. **Medium Risk:** Score between 7 and 10
 - 6.1.3. **High Risk:** Score less than 10
- 6.2. We review and update your information every six months based on your risk category or whenever there is a change in your address or business

7. Governance and Reporting

- 7.1. **Principal Officer:** Our CFO serves as the Principal Officer, responsible for AML compliance and reporting suspicious transactions to FIU-IND
- 7.2. **Designated Director:** The Executive Director oversees overall compliance with the PML Act
- 7.3. **Record Retention:** All KYC records are stored securely for at least five years after an account is closed
- 7.4. **Strict Reporting:** Suspicious transactions or cash transactions of ₹2 lakh or more in a day are reported to FIU-IND as per law

Annexure 1: Required Documents (Officially Valid Documents - OVD)

Entity Type	Mandatory Documents
Individuals	One OVD (Passport, Voter ID, Driving License, NREGA Job Card, or Aadhaar) + Recent Photograph
Companies	Certificate of Incorporation, MOA/AOA, PAN, Board Resolution/Power of Attorney, and OVDs of authorized signatories
Partnerships	Registration Certificate, Partnership Deed, PAN of the firm, and OVDs of all partners
Proprietorships	OVD of the proprietor + Two proofs of business (e.g., GST Certificate, Udyam Registration, ITR, or Municipal License)
Trusts	Registration Certificate, Trust Deed, Board Resolution, and OVDs of trustees, settlers, and beneficiaries

Approval

Department	Approval Authority	Last Review Date	Version
Compliance	Board	Dec 2025	1.0

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