ANTI-MONEY LAUNDERING (AML) / COUNTER-TERRORIST FINANCING (CTF) / KNOW YOUR CUSTOMER (KYC) POLICY

1. Glossary

Sr. No.	Abbreviation	Particulars
1	AML	Anti-Money Laundering
2	AMLCO	AML Compliance Officer
3	CDD	Customer Due Diligence
4	EC	Ethics Counsellor
5	CTF	Counter Terrorist Financing
6	EDD	Enhanced Due Diligence
7	EU	The European Union
8	FATF	Financial Action Task Force
9	KYC	Know Your Customer
10	ML	Money Laundering
11	OFAC	The Office of Foreign Assets Control
12	PEP	Politically Exposed Person
13	PMLA	Prevention of Money Laundering Act
14	RBA	Risk Based Approach
15	SAR	Suspicious Activity Report
16	SDD	Simplified Due Diligence
17	STR	Suspicious Transaction Report
18	TBML	Trade based Money Laundering
19	TSBDCL	Tata Steel Business Delivery Centre Limited
20	UN	United Nations

2. Policy Statement

The fight against money laundering & terrorist financing is a priority for the Company. We recognize that this fight is a team effort and ensure that its policies, procedures, systems and controls appropriately and adequately address the requirements of Know your Customer (KYC), Anti Money Laundering (AML)/Counter Terrorist Financing (CTF) Law and regulations.

We also support and adhere to the major international organizations, which collectively set and enforce standards for anti-money laundering & combating terrorist financing policies and programmes such as FATF (Financial Action Task Force), United Nation (UN), The European Union (EU), The Organization of American States - The Office of Foreign Assets Control (OFAC) and the local regulatory authorities.

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Tel 91 33 61250040
Corporate Identity Number U74999WB2018PLC224208

In conducting business with due skill, care and diligence, the Company seeks always to comply with relevant laws, rules, regulation, codes and standards of good practice.

We are continuously updating our processes, systems and technology and training our staff, to assure that we are well equipped to combat money laundering, terrorist financing and other financial crimes to the extent feasible. We are fully committed to remaining constantly vigilant to prevent the use of our products and services by those who would misuse them.

As our responsibility, we are carrying our periodic assessment of the adequacy and effectiveness of our KYC, AML / CTF policies, procedures and systems in preventing money laundering / terrorist financing. A similar assessment will be done periodically/ as and when required. In the case of any changes required, notification will be sent to Board and post its approval the same will be implemented in the organization.

3. Purpose

The purpose of the KYC, AML/CTF Policy is to frame standards for the AML Compliance programme. Key standards endorsed by the management are as follows:

- The purpose of this Anti-Money Laundering Policy ("AML Policy") is to prevent any involvement in any money laundering activity or whether by deemed conversion of illegally gained money or whether directly or indirectly, even where the involvement may be unintentional in the conduct of its operations and business activities of the Company.
- To ensure that Tata Steel Business Delivery Centre Limited (TSBDCL) ("the Company") is compliant with various legislative/ regulatory provisions related to AML/ KYC
- To protect the Company from being exploited as a channel for money laundering and terrorist financing.
- To protect and enhance the reputation of the Company.

Towards this objective, the Company must conduct business only with reputable customers, distributors, business partners, service providers, contractors and consultants who are involved in legitimate business activities and whose funds are *derived from legitimate sources.*

4. Scope & applicability of the policy

This policy is applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff,

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casual workers and agency staff, agents, or any other person associated with TSBDCL, and such other persons including those designated by the Ethics Counsellor from time to time (all of the aforesaid being collectively referred to as "TSBDCL Personnel").

5. Roles and Responsibilities

5.1 Board of directors

Board of directors of the Company are responsible for ensuring that an effective KYC, AML and CTF programme is put in place by establishing procedures and defining adequate guidelines for its effective implementation and ensuring appointment of an AML Compliance Officer.

5.2 AML Compliance Officer (AMLCO)

AMLCO is a designated officer for overseeing and monitoring the AML programme. The Company has appointed Ethics Counsellor as the AMLCO. All reports, complaints, doubts or concerns in relation to this AML policy shall be raised by the Designated Persons to the Ethics Counsellor.

AMLCO has the following responsibilities:

- Ensure that appropriate procedures and systems are established to enable compliance with the policy.
- Support the board of directors in managing the money laundering /terrorist financing risk.
- Report suspicious transactions to regulatory authorities.
- Ensure prompt response to information requested by regulators in relation to AML/ CTF issues.
- Monitor effectiveness of the AML/CTF training programmes.
- Periodically update AML policies / guidelines in changing business and regulatory environment.

5.3 Staff Members

All the staff members are responsible to safeguard the Company from being used by external entities for money laundering or any other illegal purposes:

- Compliance Staff Members - Compliance staff members are responsible for ensuring that the Company is compliant with all the internal/external requirements including transactions monitoring and reporting.
- Other Staff Members - Staff interacting with customers/distributors/business partners or handing transactions are the first line of defense for the company. The awareness of AML/CTF policy and related training on how to apply the same

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is key for a successful AML/CTF programme.

- It is staff's responsibility to keep themselves updated with policies and procedures related to their role in the company. Staff also has an obligation of reporting suspicious activities to AMLCO/Ethics Counsellor.

6. Definitions

6.1 Money Laundering

Money Laundering is the process whereby criminals attempt to hide and disguise the true origin and ownership of the proceeds of their criminal activities thereby avoiding prosecution, conviction and confiscation of the criminal funds. The source of the proceeds may include drug trafficking, terrorism, organized crime, illicit trade, fraud and other related crimes.

Process of Money Laundering: There are three stages of money laundering which are explained as under:

a. Placement

Involves introduction of illegally obtained fund into the financial system, usually through financial institutions. This can be achieved through purchase of goods in cash etc.

b. Layering

Usually consists of a series of transactions, through conversion and movement of funds, designed to conceal the origin of funds. This may be accomplished by creating layers of transactions by moving the illicit funds between accounts, between businesses, and by buying and selling goods from/to various parties/countries until the original source of the money is virtually untraceable.

c. Integration

This stage involves re-entering funds into legitimate economy. Once the illegitimate money is successfully integrated into the financial system, these illicit funds are reintroduced into the economy and financial system and often used to purchase legitimate assets, fund legitimate businesses, or conduct other criminal activity. The transactions are made in such a manner so as to appear as being made out of legitimate funds.

6.2 Terrorist Financing

Terrorist financing is the process by which terrorists fund their operations in order to perform terrorist acts. Terrorist financing relates to provision or collection of funds to carry out an act of killing or seriously injuring a civilian with the objective of

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intimidating a section of people or compelling a government to do or to abstain from doing any act.

6.3 Anti – Money Laundering

Anti-money laundering (AML) is a set of procedures & controls implemented to detect and prevent money laundering activities. Prevention of money laundering encompasses following aspects:

- Know Your Customers / Distributors/ Business Associates / Employees (KYC) - Identifying/ verifying the identity of customers, distributors, business associates as well as employees to be associated with the Company through prudent due diligence at the point of on-boarding/ empanelment and on-going maintenance of relationship.
- Customer/ Distributors/ Business Partner / Employees Due Diligence - Due diligence refers to various checks performed to effectively assess the identity of business partners and potential risks they may pose from a money laundering/ terrorist financing perspective. Due diligence is carried out by collecting information/ documents to identify and establish purpose, nature of business relationship and ownership. The nature and extent of due diligence will depend on the risk perceived and local regulatory requirements.
- Transaction monitoring - Ongoing monitoring of transactions to detect and control potential money laundering activities.
- Reporting suspicious activities -Periodically reporting any unusual activities from AML/CTF standpoint to regulatory authorities and in line with the reporting procedures.

6.4 Business Associates

A 'Business Associates' is defined as a person/entity who is engaged in a financial transaction or activity with the Company and includes a person on whose behalf the person who is engaged in the transaction acts. In context of this policy, it also includes customers, distributors, external processing agencies, vendors and suppliers etc.

6.5 Beneficial owner

A Beneficial owner means the natural person who ultimately owns or controls a client/ business partner and or, the person on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a juridical person.

6.6 Controlling parties

Controlling parties are individuals or entities with direct or indirect control over the relationship/ account created with the Company. For KYC purposes, controlling

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parties are defined as authorized signatories, power of attorney holders, executive management of the organization (e.g. partners, directors etc.). Different relationship/account types and transactions could involve different controlling parties depending on who is interacting with them.

6.7 Politically exposed person (PEP)

As per Financial Action Task Force (FATF) politically exposed person (PEP) is defined as an individual who is or has been entrusted with a prominent public function. Due to their position and influence, it is recognized that many PEPs are in positions that potentially can be abused for the purpose of committing money laundering and related predicate offences, including corruption and bribery, as well as conducting activity related to terrorist financing.

This also includes an immediate family member, or known close associate of such person.

For example, Heads of State or of Government, senior politicians, judicial or military officials, senior executives of state owned corporations etc.

6.8 Shell company

Shell company is a company which has no physical presence, business and assets. These companies are just used as a financial vehicle to move funds.

Shell companies can be identified through public domain information, media reports, screening and regulator's orders.

6.9 Sanction countries/ entities/ individuals

- Countries - Sanctions are imposed on a country that does not apply sufficient legislations in terms of combating money laundering and terrorist financing or which is known to be affected by criminal activities and terrorism. The list of sanctioned countries are available on the website of Office of Foreign Assets Control (OFAC) i.e. https://sanctionssearch.ofac.treas.gov/.
- Entities / individuals - Any entity/individuals who are associated with terrorism/money laundering are included in the Sanctions list. The list is maintained by United Nations Security Council and published on their website https://scsanctions.un.org/search/.

6.10 Tip-Off

Tipping off is a situation where, intentionally/unintentionally, confidential information` related to investigation is disclosed to the suspect individual/entity. For example: Internal investigation details shared by employee with the customer/ distributors/ business partner.

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6.11 Trade based money laundering (TBML)

As per FATF, trade-based money laundering is defined as the process of disguising the proceeds of crime and moving value through the use of trade transactions in an attempt to legitimize their illicit origins.

There are various common techniques used by criminals to launder money, some of which are listed below:

- Under-invoicing - Exporting the goods with invoicing lower amount than market standard which helps importer to sell the goods in the market and generate the funds.
- Over-invoicing - Exporting the goods with invoicing higher amount through which importer transfer the funds to exporter more than correct value.
- Multiple Invoicing - Creating more than one invoice for the same consignment exported to justify the reason of multiple payments. Multiple payments can be generated from various financial institutions.
- Over & under Shipment - Displaying over/ under shipment exported for receiving unreal credits in the account through trade transactions.
- False description of goods - Method of incorrect description of goods can be used to launder the money. E.g. exporter misrepresenting the quality or type of the goods on the invoice and customs documents.

6.12 Dual use goods

Dual use goods are items which can be used for both civil and military purpose e.g. software, technology, document, diagrams etc. These goods can also include raw material & components such as bearing, aluminum alloys or laser etc.

7. Customer/ Distributors/ Business Associates Acceptance Policy

The objective is to enable the Company to identify customer's/ business partners with whom Company will not establish any relationship. The relationship will not be accepted under the following circumstances:

- With any anonymous or fictitious entity
- When the Company is unable to apply appropriate customer due diligence measures,

i.e. unable to verify the identity and /or obtain required documents either due to non-cooperation of the customer or non-reliability of the documents/information furnished by the customer.

- With any sanctioned individual/ entity/country as detailed in section 6.9.
- In any manner with any person, if it is known that the Person/ entity is
  - Barred by the law of the land
  - Belongs to or affiliated to Terrorists and Terrorist & Banned Organizations.

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List of such organizations / entities is available on the website of Office of Foreign Assets Control (OFAC) i.e. https://sanctionssearch.ofac.treas.gov/

- A shell company

8. Customer Identification, Know Your Customer (KYC) and On-boarding

Customer identification means conducting client due diligence measures before establishing client relationship including identification and verification of the customer and the beneficial owner on the basis of documents to the extent feasible. The Company should collect sufficient information to establish the identity of each new customer. Following general procedures are to be followed:

- Verify customer identification evidence confirming the identity of the customer to ensure that customer is involved in legitimate business activities
- Discussions to understand their capabilities and credentials
- Site visits on a need basis

8.1 Document Collection and Verification

Necessary documents should be collected and reviewed to establish the genuineness of the customer/ distributors to the extent applicable.

List of acceptable identification documents are set out in the Annexure 1.

8.2 Identification of Beneficial Owner

The Company must aim to determine whether the customer/ distributor is acting on behalf of another person. In such case, officers/ employees may consider to obtain sufficient identification data to verify the identity of that other person to the extent feasible.

For customers that are legal persons or legal arrangements, officers/ employees of the Company must attempt to take steps to (to the extent possible):

- Understand the ownership and control structure of the customer.
- Determine the natural person(s) who ultimately owns or controls the customer.
- In case the beneficial owner is a PEP, enhanced due diligence should be carried out.

9. Risk Based Approach (RBA)

RBA means to identify and assess the money laundering and terrorist financing risks in accordance with the level of risk posed by the customer / distributors/ business associates.

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RBA allows the Company to effectively use their resources and apply enhance measures in the event higher risk is identified. RBA assists in identifying the level of due diligence required for customers/ distributors/ business partners.

Company must attempt to adopt RBA to address management and mitigation of various ML/TF risks. In order to adopt RBA the Company has developed below categories of customers/ distributors/ business partners:

9.1 Prohibited

All the customers/ distributors/ business partners listed below are classified under prohibited category:

- Barred by the law of the land.
- Belongs to or affiliated to Terrorists and Terrorist & Banned Organizations. List of such organizations / entities is available on the website of Office of Foreign Assets Control (OFAC) i.e. https://sanctionssearch.ofac.treas.gov/.
- A shell company.

9.2 High Risk

Company must attempt to consider below indicative list of customers in high risk category:

- Politically Exposed Persons (PEPs).
- Customer associated with high risk countries/ tax haven countries (Annexure 2).
- Distributor/ dealer dealing with high value cash.
- Non-profit organizations/ Charitable trust etc.
- Customers involved in instances of third party payments.
- Any other customer, company find appropriate.

9.3 Low Risk

All the other customer which does not fall under prohibited and high risk customer should be classified under Low risk.

10. Client Due Diligence

There are different levels of due diligence applied to customer based on risk assessment.

10.1 Simplified Due Diligence (SDD)

Simplified due diligence is applied to all the customers for which minimal potential money laundering and terrorist financing risk exist.

10.2 Enhanced Due Diligence (EDD)

EDD refers to additional information collection and conducting advanced background checks on individual/entities. In case there is a perception of high risk of money laundering or terrorist financing, the Company must aim to conduct enhanced due diligence to gain deeper understanding of customer/ distributors/ business partner's activities. As a part of enhanced due diligence company must attempt to collect documents/information of the customers to the extent feasible.

- Adverse information/ media checks/ public domain search.
- Credit reports such as D&B report etc. to the extent feasible (wherever necessary).
- Physical meetings with Customer or Site visits (case to case basis) or business associates references.

10.3 De-empanelment / Black-listing of Customers/ Distributors/ Business Associates

The Company must aim to consider to black list the customers/ distributors/ business associates in case they are associated with money laundering/ terrorist financing. Once the customer/ distributors/ business partners is black listed, no services/products will be offered/obtained to them in future. The data base of black list should be updated and used while on-boarding new customers/ distributors/ business partners to the extent applicable.

11. Monitoring, Identification & Reporting of Suspicious Activities

The transactions with customers and other third parties should be monitored on an on- going basis by all functions while undertaking transactions to the extent feasible. Special caution should be exercised in context to the following red flags which may purport to potential money laundering.

Suspicious transactions are identified during:

- Interaction with customer/ distributors/ business partners during purchase/sale.
- Verification of documents.
- Ongoing transaction monitoring.
- Information received from designated person.

A Suspicious transaction is one where the nature of transaction:

- Gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime.
- Appears to be made in unusual circumstances or, is of unjustified complexity and Appears to have no economic rationale.

Any suspicious activity identified must be reported to AMLCO/Chief Ethics Counsellor with internal suspicious transaction report form (Annexure 3). AMLCO/Chief Ethics counsellor will report the suspicious transaction to the

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regulatory authority. The AMLCO/Chief Ethics Counsellor is required to record the reason for treating the transaction as suspicious or non-suspicious post investigation.

The Company must ensure there is no tipping-off at any level.

Indicative list of potential red flags listed as below may be considered as a part of on- going monitoring:

- Customers/ distributor/ business associates reluctant to provide complete information and/or provide insufficient, false, or suspicious information.
- The KYC documents appear as suspicious i.e. customer/ distributor submits false documents that appears to be alerted/ inaccurate etc.
- Customers/ distributor/ business associates unwilling to comply with the Company's KYC norms customers / distributor/ business associates who appear to be acting as an agent for another company or individual, but decline or are reluctant to provide information regarding the company or individual.
- Refusal to identify owners or controlling interests.
- Beneficial owner of the customer/ distributor is located at sanctioned, high risk, and tax heaven countries.
- The transaction has no apparent or visible economic or lawful purpose.
- Customer transactions are more than expected level of activities.
- Selling or buying TSL products within same jurisdiction having an intermediary located abroad / unnecessary involvement of third parties.
- Frequent changes in bank accounts by customer/ distributors.
- Customers/ distributors whose address is not a physical site/ who do not have a physical presence.
- Any other transaction of unusual or inconsistent in nature.

12. On-going Due Diligence / Evaluation

The Company must aim to perform on-going periodic due diligence (PEP review/Sanctions screening) on their customer, distributor and business associates. The level of due diligence may differ in case of change in risk category of the customer/business associates to mitigate money laundering and terrorist financing risk.

13. Employee Training and Awareness

The Company must attempt to implement ongoing employee training programme so that all the staff members are adequately trained in AML/CTF guidelines. While considering the training needs, the Company should look into the existing experience, skill and abilities, functions and role intended, outcome of earlier training etc. Company carry out review of training needs at regular intervals in

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order to ensure that the objectives of the trainings are met depending on role of the staff members.

14. Record Maintenance

The Company consider to maintain all documents and records related to the following for five years in line with PMLA requirements.

- KYC and due diligence documents
- Transaction records
- Trainings records etc.

15. Periodic review & assessment of compliance with AML guidelines

The Company should consider periodic review and assessment of AML compliance programme to align with internal/ regulatory development (if any).

Sudeep Mishra

Sudeep Mishra

Managing Director

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Annexures

1. Annexure 1 - List sanctioned & high risk countries

Indicative List of Sanctioned countries:

Country Name	Categorization
North Korea	Sanctioned
Syria	
Iran	
Cuba	
Ivory Coast	

Indicative List of High, medium, low risk countries

Country Name	Categorization
Afghanistan	High Risk
Nigeria	
Tajikistan	
Laos	
Ghana	
Zimbabwe	
Uganda	
Cambodia	
Tanzania	
Kenya	
Liberia	
Myanmar	
Zambia	
Namibia	
Lebanon	
Yemen	
Turkey	
Pakistan	
Kuwait	Medium Risk
China	
Saudi Arabia	
Georgia	
Peru	
South Africa	
Luxembourg	

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Egypt	
Bahrain	
Mexico	
Finland	Low Risk
New Zealand	
Denmark	
Sweden	
Malta	
Poland	

Notes - For any other country listed above, staff member may approach to AMLCO

The above indicative list is based on FATF, AML Basel Index information etc.

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2. Annexure 2 – List of acceptable KYC documents

Customer/Client	Acceptable Documents
Private Limited Companies	a. Certificate of incorporation b. Memorandum and Articles of Association c. A resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf d. An officially valid document in respect of managers, officers or employees holding an attorney to transact on its behalf.
Partnership firms	a. Registration certificate b. Partnership deed c. An officially valid document in respect of the person holding an attorney to transact on its behalf
Trusts	a. Registration certificate b. Trust deed c. An officially valid document in respect of the person holding a power of attorney to transact on its behalf
Proprietorship Concerns	a. Registration certificate (in the case of a registered concern) b. Certificate/licence issued by the Municipal authorities under Shop & Establishment Act c. Sales and income tax returns d. CST/VAT certificate/ GST certificate (provisional/final). e. Certificate/registration document issued by Sales Tax/Service Tax/Professional Tax authorities

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3. Annexure 3 – Internal Suspicious Transaction Report (STR) Form

Internal Suspicious Transaction Report (STR) Form For Unusual / Potentially Suspicious Transactions From

Name Of the Employee	
Employee Code	
Designation	

To

The MLRO
Company

Transaction Details

Name of Customer	
ID No. Of the Customer	
Transaction Reference No:	
Date of Transaction	
Transaction Type	
Amount (INR)	

Reason for Suspicion by the employee

Employee's Signature	Date :