ICHIBAAN FINANCE PRIVATE LIMITED
Website: https://ichibaanfinance.com/

ANTI–MONEY LAUNDERING (AML) POLICY – VERSION 2.0

Approved by Board of Directors on 2nd February 2026
Effective from 2nd February 2026

ANTI–MONEY LAUNDERING (AML) POLICY – VERSION 2.0

---

1. PREAMBLE

Ichibaan Finance Private Limited ("the Company") is committed to preventing the use of its financial services for money laundering, terrorist financing, or any other unlawful activity.

This Policy is framed in accordance with:

- Prevention of Money Laundering Act, 2002 (PMLA)
- Prevention of Money Laundering Rules, 2005
- RBI (Non-Banking Financial Companies – Know Your Customer) Directions, 2025 (as amended from time to time)
- RBI Master Direction – NBFC – Scale Based Regulation (SBR)
- Applicable FIU-IND reporting requirements

This AML Policy shall be read together with the Company's KYC Policy.

---

2. OBJECTIVE

The objectives of this Policy are to:

- Prevent the Company from being used for money laundering (ML) and terrorist financing (TF)
- Establish a risk-based framework for AML compliance
- Ensure timely detection and reporting of suspicious activities
- Strengthen governance, monitoring, and regulatory reporting.

---

3. APPLICABILITY

This Policy applies to:

- All branches
- All employees
- All business verticals (Gold Loans and other loan products)
- All customers (individuals and non-individuals).

ICHIBAAN FINANCE PRIVATE LIMITED
Website: https://ichibaanfinance.com/

ANTI–MONEY LAUNDERING (AML) POLICY – VERSION 2.0

Approved by Board of Directors on 2nd February 2026
Effective from 2nd February 2026

4. AML GOVERNANCE STRUCTURE

4.1 Board of Directors

The Board shall:

- Approve the AML Policy
- Oversee implementation
- Review periodic AML compliance reports.

4.2 Designated Director (PMLA)

The Company shall appoint a Designated Director responsible for:

- Overall AML compliance
- Ensuring reporting to FIU-IND
- Ensuring regulatory adherence.

4.3 Principal Officer

The Company shall appoint a Principal Officer responsible for:

- Monitoring suspicious transactions
- Filing STRs and CTRs
- Coordinating with FIU-IND and RBI
- Ensuring confidentiality of reports

Details shall be communicated to FIU-IND and RBI as required.

---

5. RISK-BASED APPROACH (RBA)

The Company shall adopt a documented Risk-Based Approach to identify and mitigate ML/TF risks.

5.1 Enterprise-Level Risk Assessment

The Company shall periodically assess risks based on:

- Customer profile
- Nature of products (Gold loans / other loans)
- Geographic risk
- Delivery channels (branch/digital, if applicable)
- Transaction patterns

Risk categories:

- Low Risk
- Medium Risk
- High Risk

Enhanced Due Diligence (EDD) shall apply to high-risk customers.

---

6. CUSTOMER DUE DILIGENCE (CDD)

CDD shall be conducted in accordance with the Company's KYC Policy and RBI KYC Directions, 2025, as amended from time to time.

CDD includes:

- Customer identification and verification
- Beneficial ownership identification
- Purpose and intended nature of business relationship
- Ongoing due diligence

No anonymous or fictitious accounts shall be opened.

---

7. ENHANCED DUE DILIGENCE (EDD)

EDD shall be applied to:

- Politically Exposed Persons (PEPs)
- Non-face-to-face customers
- High-risk jurisdictions
- Complex ownership structures

- Unusual transaction patterns

EDD measures include:

- Senior management or Board of Directors approval
- Source of funds verification
- Enhanced transaction monitoring.

---

8. ONGOING MONITORING

The Company shall:

- Monitor transactions to detect unusual patterns
- Identify transactions inconsistent with customer profile
- Conduct periodic review of high-risk accounts
- Re-verify KYC where required.

Special monitoring shall apply to:

- Early loan closures with abnormal repayment patterns
- Third-party repayments
- Large cash transactions
- Multiple gold loan accounts across branches.

---

9. REPORTING TO FIU-IND

The Company shall report:

9.1 Suspicious Transaction Report (STR)

Filed promptly upon identification of suspicious activity.

Indicators include:

- Structuring of transactions
- Unusual repayment behavior
- False documentation
- Transactions without economic rationale

STR filing shall remain strictly confidential.

9.2 Cash Transaction Report (CTR)

Filed for cash transactions exceeding prescribed thresholds under PMLA Rules.

9.3 Non-Profit Organization (NPO) Transaction Reports

If applicable under law.

---

10. SANCTIONS & WATCHLIST SCREENING

The Company shall:

- Screen customers against UN Sanctions List
- Comply with domestic sanctions lists
- Prevent transactions with designated individuals/entities.

If a match is found:

- Freeze assets (if applicable)
- Inform appropriate authorities
- File necessary reports.

---

11. RECORD RETENTION

The Company shall maintain:

- KYC records: Minimum 5 years after end of relationship
- Transaction records: Minimum 5 years
- STR/CTR reporting records as prescribed

Records shall be retrievable promptly for regulatory inspection.

---

12. DATA CONFIDENTIALITY

Information relating to:

- STR filings
- Investigations
- Internal AML alerts

shall remain strictly confidential.

Employees shall not disclose STR filings to customers (no tipping-off).

---

13. TRAINING & AWARENESS

The Company shall conduct:

- Regular AML training programs
- Induction training for new employees
- Specialized training for branch and credit staff

Training shall cover:

- Identifying suspicious transactions
- Reporting obligations
- Red flags in gold loan business
- Data confidentiality

---

14. INTERNAL CONTROLS & AUDIT

The Company shall ensure:

- Independent audit of AML framework
- Periodic internal compliance review
- Reporting of deficiencies to the Board.

Corrective actions shall be implemented promptly.

---

15. EMPLOYEE ACCOUNTABILITY

Failure to comply with AML obligations may result in:

- Disciplinary action
- Reporting to regulatory authorities
- Termination of employment

---

16. GOLD LOAN SPECIFIC AML RISKS

Given the nature of gold loans, the Company shall monitor:

- Repeated pledging and release cycles
- High-value gold loans inconsistent with customer income
- Third-party gold pledging
- Gold loans used for layering activities

Branch staff shall verify source of funds for high-risk cases.

---

17. DIGITAL CHANNEL AML CONTROLS (IF APPLICABLE)

For digital onboarding or transactions:

- Secure KYC validation
- Geo-tagging and video verification (if V-CIP used)
- Fraud detection systems
- Audit trail maintenance

---

18. POLICY REVIEW

This Policy shall be:

- Reviewed annually
- Updated in line with RBI/PMLA amendments
- Approved by the Board.

---

19. EFFECTIVE DATE

This AML Policy – Version 2.0 supersedes all previous AML policies and remains effective until amended by the Board.

For Ichibaan Finance Private Limited

(CIN: U65900MH2010PTC209855)

Mr. Ashokkumar Kanhaiyalal Jain
Director
DIN: 03226248

---------- End of Policy ----------