

ANTI-MONEY LAUNDERING POLICY



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Anti-Money Laundering Policy

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1 INTRODUCTION

The Prevention of Money Laundering Act, 2002 (Act No. 15 of 2003) (PMLA or the Act) has been brought into force with effect from July 1, 2005. As per its provisions, among others, every intermediary associated with securities market and registered under section 12 of the Securities and Exchange Board of India Act, 1992 shall have to maintain a record of all the transactions; the nature and value of which has been prescribed in the Rules notified under the PMLA. GreenCell Mobility Private Limited ("Company") is a portfolio company of the Green Growth Equity Fund, which is managed by Eversource Capital Private Limited ("Eversource") in its capacity as the Investment Manager.

2 BACKGROUND

SEBI has issued a Press Release, Circular and Guidelines dated January 18, 2006 in relation to Anti-Money Laundering (AML) measures required to be put in place by all SEBI registered intermediaries. Though not strictly applicable, the Company as a matter of good governance has adopted this Policy. The SEBI Guidelines provides a general background on the subjects of money laundering and terrorist financing summarizes the main provisions of the applicable anti-money laundering and anti-terrorist financing legislation in India and provides guidance on the practical implications of the Act. The Guidelines also sets out the steps that a registered intermediary and any of its representatives, should implement to discourage and identify any money laundering or terrorist financing activities.

International initiatives taken to combat drug trafficking, terrorism and other organized and serious crimes have concluded that financial institutions including securities market intermediaries must establish procedures of internal control aimed at preventing and impeding money laundering and terrorist financing. Money Laundering (ML) is the processing of criminal proceeds in order to disguise their illegal origin. Banking system worldwide is susceptible to channeling of funds for such activities. In response to the international community's growing concern about this problem, most global organizations and national governments who are members of the United Nations General Assembly have been actively pursuing programs to deter ML.

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There is a need for financial intermediaries to have a system in place for identifying, monitoring and reporting suspected money laundering or terrorist financing transactions to the law enforcement authorities.

3 SCOPE AND OBJECTIVES

The AML Policy seeks to establish standards of compliance for the Company in respect of its activities and financial dealing handled by it. The Company is fully committed to establishing appropriate policies and procedures for the prevention of ML and terrorist financing and ensuring their effectiveness and compliance with all relevant legal and regulatory requirements. This AML Policy to combat money laundering covers:

- a) Communication of the AML Policy relating to prevention of money laundering and terrorist financing to all management and relevant staff that handle investor information, securities transactions, money and investor recordsetc.;
- b) Framing Investor, co-investor, joint venture partners, target companies, potential sellers, channel partners and applicable long term contracting parties due diligence measures, including requirements for proper identification and appropriate 'Know your Client' (KYC) documents;
- c) Maintenance of records;
- d) Compliance with relevant statutory and regulatory requirements;
- e) Co-operation with the relevant law enforcement authorities, including the timely disclosure of information; and
- f) Role of finance and compliance functions to ensure compliance with policies, procedures, and controls relating to prevention of money laundering and terrorist financing, including the testing of the system for detecting suspected money laundering transactions, evaluating and checking the adequacy of exception reports generated on large and/or irregular transactions, the quality of reporting of suspicious

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transactions and the level of awareness of front line staff of their responsibilities in this regard.

With a view of the Company's operations, ML is likely to occur primarily in relation to the sourcing of investments in the company, or its subsidiaries/ affiliates or potential acquisitions/sale, joint ventures or other arrangements with channel partners, and other similar long term contracting parties ("Investors"). However, there may be some selective transactions/ services provided which pose a risk of ML and hence these transactions / services have also to be viewed under the policy framework.

The key AML objectives of the Company are:

- a) To establish a framework for adopting appropriate AML procedures and controls in the operations/business processes of the Company.
- b) To ensure compliance with the laws and regulations in force from time to time.
- c) To protect the Company's reputation.
- d) To assist law enforcement agencies in their effort to investigate and track money launderers.
- e) To lay down AML compliance norms for the employees of the Company.

4 MONEY LAUNDERING RISKS

The Company is aware that it is exposed to several risks if an appropriate AML framework is not established, which are detailed as under:

- a) Reputation Risk- Risk of loss due to severe impact on Company's reputation. This requires maintaining the confidence of Company's investors, stakeholders, creditors and the general marketplace.
- b) Compliance Risk- Risk of loss by way of fines, criminal liability etc due to failure of compliance with key regulations governing the Company's operations.

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- c) Operations Risk- Risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events.
- d) Financial Risk- Risk of loss due to any of the above risks or combination thereof resulting into the negative financial impact on the Company.

5 AML OPERATING STRUCTURE

The responsibility of complying with Policy, PMLA and related legislations, circulars and guidelines of SEBI/ RBI, is on all the employees of the Company. However, select departments such as the Finance and Compliance Departments of the Company have specific responsibilities as laid down in the AML Policy.

5.1 Supervision by the Board

The Board shall supervise the implementation of the AML Policy framework.

5.2 Money Laundering Reporting Officer (MLRO)

The PMLA requires that a principal officer is to be named who will be responsible for compliance with PMLA and the rules framed thereunder, monitoring of transactions and reporting of suspicious transactions. For the Company the principal officer designated as the MLRO will be the Compliance Officer. The Company shall have a committee for monitoring the implementation of this Policy comprising of the MLRO and 1 person from finance team and 1 from the operations team (**Money Laundering Reporting Committee**).

The functions of the MLRO/MLRC shall include:

- a) Liaising with the regulatory/enforcement authorities on AML matters. MLRO/MLRC shall submit periodic reports to the Board including the adequacy of the systems and controls of the Company for managing ML risks and for recommending any changes or improvements, as necessary.
- b) Review and approve all funds raised/invested /services offered/services availed by the Company to ensure compliance with AML policies and procedures. New fund raised/invested

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and services offered/ services availed of the Company shall be referred to the MLRO/MLRC in this regard.

- c) Ensure that AML controls are put in place before any new investor is brought on board, or new joint venture, or partnership is executed, or acquisition/sale is undertaken, or arrangements with channel partners, and similar long term contracting parties are executed. The controls shall include the ML risk rating of Investors, checklist on ML indicators, definition of suspicious behavior and compliance framework and systems for monitoring and mitigating the ML risks.
- d) Participate in strategic planning meetings or comment on proposed plans specifically if the new strategy increases the ML risk exposure of the Company e.g. receiving investments from international markets, introduction of products to facilitate cross border payments etc.
- e) Advise the detailed responsibilities of the respective AML Compliance functionaries.
- f) Escalation of unusual behavior and suspicious activity / investments /transactions to the Board of Directors of the Company.
- g) Monitoring of compliance and exception reporting.
- h) Review all reports required to be submitted to regulatory/law enforcement authorities and ensure that the reports are submitted on a timely basis.
- i) Communication of the Policy to all staff and arrangements for their training in respect of the AML Policy.

5.3 Exception Procedures

All the exceptions to AML policy and procedures must be recorded and reported to the MLRO/MLRC immediately. The MLRO/MLRC shall subsequently lay down appropriate exception procedures and reporting from time to time as may be necessary. Significant exceptions shall be reported to the Board on a quarterly basis.

5.4 Escalation Procedures

Any suspicious activity or transaction, which has been identified, shall be escalated to the MLRO/MLRC as soon as possible but not later

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than one working day after establishing the reasonable grounds for suspicion. The suspicious activity or transaction in the prescribed format will be reported in accordance with the applicable laws.

6 AML STANDARDS

The Company adopts a risk-based approach in implementing its AML framework. The AML standards would be primarily based on two pillars, namely, KYC and Monitoring/Reporting of Suspicious Transactions (MSTR). The suspicious transactions shall include large as well as cash transactions above a threshold limit. Though, the provisions allow the Company to accept cash up to the specified threshold limit, the Company shall not accept any cash in respect of financial dealing handled by it.

6.1 Risk-based Approach in Implementing AML Framework

In order to ensure efficient implementation of the AML framework, it is necessary to establish a risk-based process on the basis of which, detailed AML procedures shall be evolved. It is recognized that a higher level of due diligence and monitoring would be specified for business areas prone to higher ML risks.

It is generally recognized that certain Investors may be of a higher or lower risk category depending on circumstances such as the their background, type of business relationship or transaction etc. As such, the Company should apply each of the due diligence measures on a risk sensitive basis. The basic principle enshrined in this approach is that the Company should adopt an enhanced due diligence process for higher risk categories. Conversely, a simplified due diligence process may be adopted for lower risk categories of such Investors. In line with the risk-based approach, the type and amount of identification information and documents that Company should obtain necessarily depend on the risk category of a particular Investor.

6.2 Due Diligence Process

The AML Policy has three specific parameters, which are related to the overall 'Due Diligence Process':

- a. Policy for acceptance of Investors
- b. Procedure for identifying the Investors

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c. Monitoring and reporting especially Suspicious Transactions Reporting (MSTR)

6.2.1 The Investor Due Diligence ("IDD") measures comprise the following:

- a) Obtaining sufficient information in order to identify persons who beneficially own or control the investments made in the Funds managed by the Company. Whenever it is apparent that the investment made or maintained are beneficially owned by a party other than the investor, that party should be identified using investor identification and verification procedures. The beneficial owner is the natural person or persons who ultimately own, control or influence a investor and/or persons on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person or arrangement;
- b) Verifying the Investors' identity using reliable, independent source documents, data or information;
- c) Identifying beneficial ownership and control, i.e. determine which individual(s) ultimately own(s) or control(s) the Investor and/or the person on whose behalf a transaction is being conducted;
- d) Verifying the identity of the beneficial owner of the Investor and/or the person on whose behalf a transaction is being conducted, corroborating the information provided in relation to (c); and
- e) Conducting ongoing due diligence and scrutiny, i.e. perform ongoing scrutiny of the transactions and account throughout the course of the business relationship to ensure that the transactions being conducted are consistent with the Company's knowledge of the customer, its business and risk profile, taking into account, where necessary, the Investor's source of funds.

An illustrative checklist to be followed by the Finance Department before acceptance of contributions from investors is enclosed in Annexure II.

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6.3 Policy for Acceptance of Investors:

This Policy aims at identifying the types of Investors that are likely to pose a higher than the average risk of money laundering or terrorist financing. By following the AML Policy, the Company will be in a better position to apply Investor Due Diligence on a risk sensitive basis depending on the type of customer business relationship or transaction. In a nutshell, the following safeguards will be followed, while accepting Investors:

- a) No investment will be accepted in a fictitious / benami name or on an anonymous basis. No payments to or from any Investor, shall be made other than through bank transfer or Demand Draft.
- b) Documentation requirement and other information to be collected in respect of different classes of Investors depending on perceived risk and having regard to the requirement to PMLA, guidelines issued by RBI / SEBI from time to time.
- c) Ensure that an investment or payment is not accepted where the Company is unable to apply appropriate Investor Due Diligence measures / KYC policies. This may be applicable in cases where it is not possible to ascertain the identity of the Investor, information provided to the Company is suspected to be non-genuine, perceived non co-operation of the client in providing full and complete information. The Company will not continue to do business with such a person/ entity and file a suspicious activity report. It should also evaluate whether there is suspicious trading in determining in whether to suspend or return the investment or suspend or cancel the contract. The Company should be cautious to ensure that it does not return investments/ payments that may be from suspicious trades. However, in such a case the relevant authorities could be consulted in determining what action it should take when it is suspected that the transaction involves suspicious trading.

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- d) Necessary checks and balance to be put into place before accepting an investment so as to ensure that the identity of the investor does not match with any person having known criminal background or is not banned in any other manner, whether in terms of criminal or civil proceedings by any enforcement agency worldwide.

6.4 Identification Procedure (IIP/ KYC):

The Company is aware that availability of sufficient Investor information underpins all other AML procedures and should be seen as a critical element in the effective management of ML risks. The 'Know your Client' (KYC) policy spells out the Investor identification procedure to be carried out at different stages i.e. while establishing the Company-Investor relationship, while carrying out transactions with the Investor or when the Company has doubts regarding the veracity or the adequacy of previously obtained Investor identification data.

The procedures to be followed for the KYC are as under:

- a) The Investor should be identified by the Company by using reliable sources including documents / information. The Company shall ensure that there is in place a process of Investor identification and verification depending on the nature/status of the investor and kind of transactions that are contemplated to take place. Appropriate Investor identification and verification procedures shall be conducted at different stages i.e. while establishing a investor relationship, carrying out a financial transaction or when the Company has doubt about the authenticity/veracity or the adequacy of the previously obtained investor identification data. The Finance Department and Compliance Team should obtain adequate information to satisfactorily establish the identity of each new Investor and the purpose of the intended nature of the relationship before contribution of the Investor is accepted. The checklist appended in Annexure II provides suggested documentation that is to be collected in this regard. The Company shall ensure that a business relationship is commenced only after establishing and verifying the identity of the Investor and understanding the

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nature of the business the Investor expects to conduct. Appropriate KYC procedures based on commercial judgment shall be adopted which will include systems relating to proper management oversight, controls, segregation of duties, training, due diligence, reporting, regulations and other related procedures.

- b) The risk based KYC procedures adopted herein shall be applicable to all the new Investor relationships. The KYC procedures shall become applicable to existing Investors only if the risk profile of the Investor or Investor segment changes to a higher risk category or based on materiality or pursuant to any applicable regulatory guidelines or when there is an unusual pattern in the operation of Investor's transactions. This shall be done by way of enhanced due diligence. Further, the Company should also maintain continuous familiarity and follow-up where it notices inconsistencies in the information provided. The underlying principle should be to follow the principles enshrined in the PMLA as well as the SEBI Act, 1992 so that the Company is aware of the Investor on whose behalf it is dealing.
- c) The information should be adequate enough to satisfy competent authorities (regulatory / enforcement authorities) in future that due diligence was observed by the Company in compliance with the Guidelines. Each original document should be seen prior to acceptance of a copy or the copy should be attested by Notary Public/ Gazetted Officer/ Manager of a Scheduled Commercial Bank.
- d) Failure by prospective investor to provide satisfactory evidence of identity should be noted and reported to the MLRO.

6.5 Monitoring/Reporting of Suspicious Transactions (MSTR)

A satisfactory KYC procedure provides the foundation for recognizing unusual or suspicious transactions. As a part of ongoing monitoring, transactions of individuals/entities shall be screened against negative list, including those notified by regulators/statutory authorities. For the purpose of reporting of suspicious transactions, apart from transactions integrally connected, transactions remotely connected or



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related will also be considered. A list of circumstances, which may be in the nature of suspicious transactions, is given below. This list is only illustrative and whether a particular transaction is suspicious or not will depend upon the background, details of the transactions and other facts and circumstances:

- a) Investors whose identity verification seems difficult or Investor appears not to cooperate;
- b) Investors where the source of the funds is not clear or not in keeping with investors apparent standing /business activity;
- c) Investors in high-risk jurisdictions or Investor introduced by banks or affiliates or other clients based in high risk jurisdictions;
- d) Unusually large cash investments made by an individual or business.

Any suspicion transaction should be immediately notified to the MLRC/MLRO in the form of a detailed report with specific reference to the Investor, transactions undertaken and the nature / reason of suspicion. However, it should be ensured that there is continuity in dealing with the Investor as normal until told otherwise and the Investor should not be told of the report/suspicion. In exceptional circumstances, consent may not be given to continue the transaction, and transactions may be suspended or other action taken.

6.6 Audit / Monitoring of Transactions

The Finance Department should ensure a record of transaction is preserved as may be required statutorily under the Companies Act, 2013 and / or Income Tax Act, 1961 and maintained in terms of section 12 of the PMLA and that transaction of suspicious nature or any other transaction notified under section 12 of the PMLA Act is reported to the appropriate law authority. Suspicious transactions should also be regularly reported to the MLRC/MLRO. Further, the MLRC/MLRO shall randomly examine a selection of transaction undertaken by Investor to comment on their nature i.e. whether they are in the suspicious transactions or not.

The scope of internal audit of the Company will include testing of compliance with the AML Policy and KYC/AML procedures. The checklist of items reviewed, including a summary of deficiencies and

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actions taken must be documented and submitted to the Board of Directors the Company.

6.7 Training and Review

Adequate ongoing training programmes shall be conducted for all concerned employees on the requirements laid down in this AML Policy document. Training must relate to employees' daily work and comprise examples from business including continuous training needs.

The Company will:

- a) ensure that the content of this AML Policy is understood by all staff members including training requirement envisaged;
- b) adopt procedures which are sensitive to the risk of money laundering and terrorist financing;
- c) undertake Investor Due diligence measures to an extent that is sensitive to the risk of money laundering and terrorist financing depending on the type of investor, business relationship or transaction; and
- d) Develop staff members' awareness and vigilance to guard against money laundering and terrorist financing.

7 MIS & REPORTING

7.1 Record Keeping

The Finance Department shall maintain appropriate records or documentation of investor relationships and transactions sufficient to permit or enable reconstruction of any transaction including the amounts and types of currencies involved, if any, so as to provide, if necessary, evidence for prosecution of criminal behavior. The Company should ensure compliance with the record keeping requirements contained in the SEBI Act, 1992, Rules and Regulations made there-under, PMLA as well as other relevant legislation, Rules, Regulations, Exchange Bye-laws and Circulars.

The Finance Department shall be required to maintain a record of all the transactions, which include:

- a) All cash transactions of the value of more than Rs.10 lakh or its equivalent in foreign currency.

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- b) All series of cash transactions integrally connected to each other which have been valued below Rs.10 lakh or its equivalent in foreign currency where such series of transactions take place within one calendar month.
- c) All suspicious transactions whether or not made in cash.

Should there be any suspected drug related or other laundered money or terrorist property, the competent investigating authorities would need to trace through the audit trail for reconstructing a financial profile of the suspect account. To enable this reconstruction, the Finance Department shall retain the following information of transaction of the investors in order to maintain a satisfactory audit trail:

- a) the beneficial owner of the account;
- b) the volume of the funds flowing through the account; and
- c) for selected transactions:
 - the origin of the funds;
 - the form in which the funds were offered or withdrawn, e.g. cash, cheques etc.;
 - the identity of the person undertaking the transaction;
 - the destination of the funds;
 - the form of instruction and authority.

The Finance Department should ensure that all investor and transaction records and information are available on a timely basis to the competent investigating authorities. Where appropriate, they should consider retaining certain records, e.g. investor identification, transaction files and business correspondence, for periods which may exceed that required under the SEBI Act, Rules and Regulations framed PMLA, other relevant legislations, Rules and Regulations or Exchange bye-laws or circulars.

7.2 Retention of Records

All records, both domestic and international shall be maintained for a period of ten years or such minimum period prescribed under the relevant legislations (including PMLA) from the date of cessation of the transaction. Records shall be maintained in a manner, which facilitates its easy retrieval as and when required. Records on investor identification (e.g. copies or records of identity residence like passports, identity cards, driving licenses or similar documents),

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transaction files and business correspondence should also be kept for the same period. In situations where the records relate to on-going investigations or transactions which have been the subject of a suspicious transaction reporting, they should be retained until it is confirmed that the case has been closed.

7.3 Reporting to the Board

The Board shall review reports detailing the ML risk management actions of the Company. The adequacy of the ML risk measurement systems, including any findings of internal and external auditors and advisors shall be reported to the Board on a quarterly basis. The Board will review the quarterly exception reports submitted by the MLRO.

7.4 Regulatory Reporting

MLRC/MLRO must implement necessary procedures and controls to ensure that all regulatory reporting as laid down by the applicable regulations is completed properly and within the required reporting timelines. The MLRC/MLRO or his designated staff shall review all reports required to be submitted to regulatory/law enforcement authorities prior to submission from time to time. Specific forms/formats as approved by the MLRC/MLRO shall be used for reporting unusual transactions/suspicious transactions or in submitting any other information as may be prescribed.

8 Annexure I : Glossary Of Terms

Investor

The term 'Investor' would refer to any person or entity whether a natural person, juristic entity, a firm, a trust, an unincorporated association of persons, acting for itself or in any fiduciary capacity, who (i) for itself or on behalf of another, invest in the Funds advised or managed by the Company or (ii) has a business relationship with the Company or (iii) is a beneficiary of the transactions conducted by Professional Intermediaries [Professional Intermediaries include Stockbrokers, Chartered Accountants, Solicitors etc. as permitted under law or customary practices] or (iv) is connected with a financial transaction which can pose significant reputational or other risks to the Company.



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Records

The term 'Records' shall include the records maintained in the form of books or stored in a disk, floppy/micro film etc. and any other electronic storage device or such other form as may be prescribed.

9 ANNEXURE II: CHECKLIST OF DOCUMENTS REQUIRED TO COMPLY WITH AML LEGISLATIONS

The Company shall verify the identity of all investors / beneficial owners and keep on record the following due diligence documents in addition to an explanation on source of funds by the investor:

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9.1 Individuals

1. Identity Proof - One copy of his/her recent photograph; and Adhaar Card/ Permanent Account Number (PAN) Card. In case of Non Photo PAN Card in addition to copy of PAN Card any one of the following: Driving License /Passport copy / Voter ID.
2. Address / Residence Proof (any one)
 - (i) Adhaar Card
 - (ii) Passport
 - (iii) Driving license
 - (iv) Latest Bank account statement
 - (v) Ration Card
 - (vi) Rent Agreement
 - (vii) Latest Telephone bill
3. Kindly Note
 - (i) **Joint Holders:** Joint holders (including first, second and third if any) are required to be individually KYC compliant. e.g. in case of three joint holders, all holders need to be KYC compliant.
 - (ii) **Minors:** In case of investments in respect of a Minor, the Guardian should be KYC compliant. The Minor, upon attaining majority, should immediately apply for KYC compliance in his/her own capacity, in order to be able to transact further in his/her own capacity.
 - (iii) **Power of Attorney (PoA) Holder:** Investors desirous of investing through a PoA must note that the KYC compliance requirements are mandatory for both the PoA issuer (i.e. Investor) and the Attorney (i.e. the holder of PoA), both of whom should be KYC compliant in their independent capacity and attach their respective KYC Acknowledgements while investing.

9.2 Corporate Bodies

True copies of all of the below documents:

1. Certificate of incorporation and Memorandum & Articles of Association

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2. Resolution of the Board of Directors:
 - a. to invest in the Company, mentioning amount to be invested or mentioning the word "upto any amount"
 - b. delegating power to its directors, officers etc to transact on its behalf; OR
 - c. Copy of Power of Attorney granted to its managers, officers or employees to transact business on its behalf (if applicable)
3. Declaration of Company's letterhead giving details of any two directors (Name, Address, PAN No., Passport No., Voter ID Card No.) & details including PAN No. and address of major shareholders holding more than 20% stake
4. PAN card
5. Address proof – Form 18 and Latest telephone bill or Rent bill or Electricity bill
6. If listed company then website address of the stock exchange where listed

9.3 Partnership Firms

True copies of all of the below documents:

1. Extract from the Registrar of Firms / Registration Certificate (certified)
2. Partnership deed (notarized)
3. Any officially valid document identifying the partners and the persons holding the Power of Attorney and their addresses (if applicable)
4. Address proof of the Firm - Telephone bill, Rent bill or Electricity Bill in the name of firm/partners and bearing the address of the Firm
5. PAN Card of the Firm
6. Identity proof of the Partners - One copy of his/her recent photograph; and Permanent Account Number (PAN) Card. In case of Non Photo PAN Card in addition to copy of PAN Card any one of the following - Driving License /Passport / Voter ID.

9.4 Trusts

True copies of all of the below documents:

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1. Certificate of registration, if registered
2. Trust deed
3. Resolution of the managing body of the foundation / association for
 - a. the investment specifying the amount to be invested in the Company or overall limit.
 - b. delegating power to its Trustees, officers etc to transact on its behalf; OR
 - c. Power of Attorney granted to transact business on its behalf
4. Address proof - Telephone bill or Electricity Bill or Rent Bill
5. PAN No. of the Trust
6. Identity proof and address proof of the Trustees and the Beneficiaries - One copy of his/her recent photograph; and Permanent Account Number (PAN) Card. In case of Non Photo PAN Card in addition to copy of PAN Card any one of the following - Driving License /Passport copy / Voter ID.

9.5 Association of Persons (AOP) or Body of Individuals (BOI) e.g. HUF

True copies of all of the below documents:

1. Address Proof

One certified copy of an officially valid document containing details of his/her permanent address or addresses, current address or addresses; and any one of

- a) Passport
- b) Driving license
- c) Bank account statement
- d) Ration Card
- e) Rent Agreement
- f) Latest Telephone bill

2. Identity proof of Karta

His/her recent photograph and Adhaar Card/ Permanent Account Number (PAN) Card. In case of Non Photo PAN Card in addition to copy of PAN Card any one of the following: Driving License /Passport copy / Voter ID.



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- 3.** Resolution of the managing body of such association or body of individuals for
 - a. investing in the Fund and
 - b. delegating power to its Karta, officers etc to transact on its behalf; OR
 - c. Power of attorney granted to him to transact on its behalf.

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