

**Policy And Procedures of Know Your Customer (KYC) and Customer Due Diligence (CDD) of  
SAL Securities (Pvt) limited**

1. While developing the KYC and CDD policies and framework, International best practices, recommendations from the relevant bodies such as Financial Action Task Force (FATF) have been taken into account by our firm SAL Securities (Pvt) Ltd, here after called the company.
2. The KYC/CDD policy provides for the following:
  - Customer Identification
  - Risk assessment of customer
  - Circumstances where Enhanced Due Diligence is required
  - On-going due Diligence
  - Circumstances where simplified Due Diligence can be adopted
  - Compliance function
  - Data retention
  - Training and employee screening
3. Customer identification
  - 3.1. The company ensures that no anonymous accounts or accounts that are obviously in the name of fictitious persons are opened or maintained. The company must take all reasonable steps to confirm the true identity of the prospective client and to collect all relevant information to ascertain the identity of the real controlling party of the trading account. For this purpose, minimum set of documents as prescribed by SECP from time to time shall be obtained. Additional documents may be obtained where considered necessary.
  - 3.2. The company's management shall determine whether a customer is acting on behalf of another person. In such cases steps should be taken and all the relevant documents should be obtained to determine the true identity of that person.
  - 3.3. For legal persons, the company management shall reasonable measures to understand the beneficial ownership and control structure of the customer. For this purpose, the company shall seek to identify the natural persons with controlling interest and who constitute the mind and management of the legal person or arrangement.
  - 3.4. For legal persons, the company management shall verify that person purporting to act on behalf of the customer is so authorized.
  - 3.5. The company management shall ensure that accounts of Institutions/ body corporate are not opened in the individual name of any employee/ official. Government accounts should not be opened in the personal names of Government officials. Any such account, which is to be operated by an officer of the Federal/Provincial/Local Government in his/her official capacity, shall be opened only on production of a special resolution/ authority from the concerned administrative department duly endorsed by the Ministry of Finance or Finance Department of the concerned Provincial or Local Government.

- 3.6. The company should obtain and document sufficient information on the purpose and intended nature of the account to be opened/maintained with them and develop a profile of the customer based on results of customer identification and the risk assessment. Information regarding the intended investment plan of the customer must also be obtained to the extent possible and should be documented.
- 3.7. The company must obtain sufficient information to determine the expected source of funding for the account, particularly whether the client shall be receiving/ remitting funds in foreign currency.
- 3.8. In addition to the requirements mentioned above, the company must ensure that all receipts and payments to the customers above the prescribed threshold must be through cross cheques, bank drafts, pay orders or other crossed banking instruments. For exceptional circumstances where it becomes necessary for a broker to accept cash from a customer, reporting of such instances with rationale should be made immediately to the exchanges.
- 3.9. The company shall ensure physical presence of the customer at the time of opening of account. In case of off-shore clients or clients in cities where the company does not have a branch, the company must apply appropriate procedures, such as verification by a reliable third party, confirmation from previous broker of the clients etc. When obtaining confirmation from the third parties in different jurisdictions the brokerage house must consider whether that jurisdiction is following the FATF (Financial Action Task Force) recommendations.

#### 4. Risk Assessment

- 4.1. The company must perform a risk assessment of all the existing and prospective customers on the basis of information obtained regarding their identity, nature of income, source of funding, location etc and based on the results of such assessment, categorize their customers among high risk, medium risk and low risk customers. The company should develop clear guidelines for identification of High Risk customers which include:
  - i. non-resident customers;
  - ii. legal persons or arrangements including non-governmental organizations, (NGOs) / not-for-profit organizations (NPOs) and trusts / charities;
  - iii. customers belonging to countries where CDD / KYC and anti-money laundering regulations are lax or if funds originate or go to those countries;
  - iv. Customers whose business or activities present a higher risk of money laundering such as cash based businesses;
  - v. customers with links to offshore tax havens;
  - vi. high net worth customers with no clearly identifiable source of income;
  - vii. there is reason to believe that the customer has been refused brokerage services by another brokerage house;
  - viii. Non-face-to-face / on-line customers;
  - ix. establishing business relationship or transactions with counterparts from or in countries not sufficiently applying FATF recommendations; and
  - x. Politically Exposed Persons (PEPs) or customers holding public or high profile positions
- 4.2. Politically Exposed Persons” (PEPs) are individuals who are or have been entrusted with prominent public functions for example senior politicians, senior government, judicial or military

officials, senior executives of state owned corporations, important political party officials. Business relationships with family members or close associates of PEPs involve reputational risks similar to those with PEPs themselves. The definition is not intended to cover middle ranking or more junior individuals in the foregoing categories.

- 4.3. Broker should conduct a self-assessment for money laundering and terrorist financing risk, identifying and documenting the key risks presented to it by virtue of its business model, types of customers and geographical placement

## 5. Enhanced Due Diligence

- 5.1. The company should apply Enhanced Due Diligence (EDD) when dealing with high-risk customers. Appropriate policies and procedures must be developed and put in place to ensure that activities and transactions of High-risk customers are adequately monitored and any unusual transactions are reported.

- 5.2. While dealing with the high-risk customers including the PEPs, the company should:

- i. Obtain senior management approval for establishing business relationships with such customers. The same shall also apply in case of an existing customer which is classified as High-risk pursuant to these guidelines or which is subsequently classified as a result of ongoing due diligence;
- ii. Take reasonable measures to establish the source of wealth and source of funds.

- 5.3. If the Broker is unable to comply with the above requirements, it should not open the account, or should terminate the business relationship, as the case may be and should submit a Suspicious Transaction Report.

6. When a Broker is not able to identify and verify the identity of the customer and the beneficial owner or is not able to obtain adequate information regarding the purpose and intended nature of the customer relationship, it should not open the account, commence customer relationship or in the case of an existing customer should terminate the relationship and consider the filing of a Suspicious Transaction Report.

## 7. On-going Due Diligence

- 7.1. CDD is not a one-time exercise. The company should ensure that on-going Due Diligence On the customer relationship and scrutiny of transactions is undertaken to ensure that the transactions executed in a particular account are consistent with the Broker's knowledge of the Customer, its business and risk profile, historical pattern of transactions and the pattern and source of funding of the account.

- 7.2. The company shall ensure that the customer records are updated at regular intervals and sufficient information is obtained regarding any significant change in the customer profile.

## 8. Simplified Due Diligence

8.1. The company shall apply simplified or reduced CDD measures in the following circumstances:

- i. risk of money laundering or terrorist financing is lower;
- ii. information on the identity of the customer and the beneficial owner of a customer is publicly available;
- iii. adequate checks and controls exist.

8.2. Accordingly, following customers may be considered for simplified or reduced CDD:

- Financial institutions which are subject to requirements to combat money laundering and terrorist financing consistent with the FATF Recommendations and are supervised for compliance with those controls
- Public companies that are subject to regulatory disclosure requirements
- Government administrations or enterprises

8.3. When opting for simplified or reduced due diligence, the FATF guidelines in this regard must be consulted. Simplified CDD should not be followed when there is an identified risk of money laundering or terrorist financing.

## 9. Compliance function

9.1. The company should set up a compliance function with suitable human resource and MIS to effectively reporting capabilities, enabling it make timely reports.

9.2. The Head of Compliance function must have skills and experience necessary for satisfactory performance of functions assigned. Head of Compliance must be independent and report directly to the Board of Directors.

9.3. The Compliance function shall ensure compliance with the requirements of these guidelines as well as other regulatory requirements applicable on the Broker under the relevant legal framework. A record should be maintained of all violation/ non-compliance identified and reported to the BoD and must be available for the inspection of Commission as and when required.

9.4. Unusual activity in any account will be watched closely and Enhanced Due Diligence (EDD), wherever required, will be initiated. The compliance function shall ensure the access compliance

9.5. status with the regulatory requirements pertaining to KYC, CDD and EDD wherein net traded amount (i.e value bought – value sold) of an investor in a month is equal to or greater than the following thresholds.

INVESTOR CLASS	INVESTMENT AMOUNT (RS IN MILLION)
CORPORATE	25.00
PROPRIETARY BROKER	20.00
INDIVIDUAL	5.00

In case of non-compliance, appropriate action, which includes EDD and generation of Suspicious Transaction Report, will be initiated and a record of the same will be maintained. A summary

report of investors having net investment above or equal to the thresholds will be maintained in the format at Annexure-E. The Head of compliance will maintain the record and report directly to the Board of Directors.

#### 10. Data Retention

The company shall maintain the relevant documents obtained through the application of KYC/CDD procedures, especially those pertaining to identification of the identity of a customer, account files and correspondence exchanged for a minimum period of five years.

#### 11. Training

The company should develop an on-going employee training program to ensure that the employees understand their duties and are able to perform the same on a satisfactory level.

#### 12. Screening

12.1. The company shall develop and implement appropriate screening procedures to ensure high standards while hiring staff. However, the screening process must be an on-going exercise and must be applied consistently to ensure that employees, particularly those working at sensitive positions, meet and maintain high standards of integrity and professionalism.

12.2. The company must provide any information concerning its clients and their transactions to the exchanges, Financial Monitoring Unit or the Commission as and when required.

#### 13. Other requirements

The company must comply with the requirements of Anti Money Laundering Act, 2010 as applicable on them, including the requirement to file Suspicious Transaction Reports and any directives, circulars, guidelines issued in this regard by Federal Government, Financial Monitoring Unit and SECP.