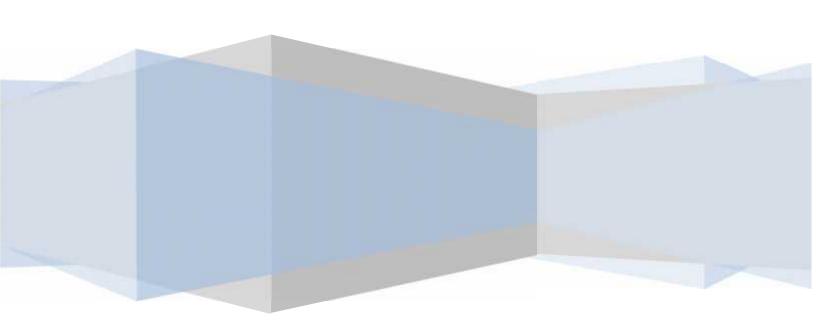


# **Customer (CDD/ KYC) Policy**



#### 1. Introduction

- 1.1 Muhammad Salim Kasmani Securities (Pvt.) Ltd (MSK) has formulated a Customer Due Diligence/ Know Your Customer policy, referred here as "CDD/ KYC policy", based on the criteria/ guidelines specified in the Securities & Exchange Commission of Pakistan (SECP) and Explanatory note/ Commentary dated March 16, 2012
- 1.2 The CDD/ KYC policy has been approved by the Board of MSK. The Board has authorized the CEO to approve any subsequent amendments.
- 1.3 This policy defines different types of customers, their minimum required information & Documents along with the characteristics of High Risk Customers. It further explains how to ensure the identity of the clients, who initiates relationship with MSK and how to maintain and update the CDD/KYC measures for existing customers
- 1.4 For better services to our customers, MSK has also developed and put in place a "KYC Form" which classifies the categories of CDD/ KYC for both Individual and Institutional Clients MSK Sales Team are required to ensure that the Customer's information (including Joint Account holders) shall be submitted to the Operations Department by duly submitting a KYC Form
- 1.5 The KYC Form is attached as Appendix 2 and CDD Checklist is attached in Appendix 1 and shall be considered as integral part of CDD/KYC policy

#### 2. Areas Covered

- 2.1 The scope of CDD/ KYC policy is to establish reasonable measures to know about the Customers of MSK, whether individual or institutional, in accordance with the stated Guidelines by the Commission
- 2.2 For this purpose, training with respect to CDD/ KYC to the concerned staff of MSK shall be carried out on regular basis

### 3. Documents Required

3.1 MSK shall obtain the minimum information/set of documents from various types of Customers, detail of which are as follows;

S. #	Type of Customers	Information Required	Documents Required
1	Individuals / Sole proprietor Ship	Name and Father's Name Address Telephone Number(s)/Mobil No /Email Sources of Income Nationality & NTN Guardian name (if Applicable)	Copy of CNIC or passport or attested copy of B form in case of Minor  Detail of Business / Employment Proof/ Pension/Spouse or Family funds  Zakat Exemption Certificate (If Applicable )  Guardian Certificate (If Applicable)
2	Partnership based entity	Name of Partnership Entity Names of Partners Father's Name of Partners Address of Partnership entity Telephone Number(s)	Copy of CNIC/ passport of all Partners Copy of CNIC of authorized signatories List of Authorized signatories along with power of attorney Resolution authorizing investments Copy of latest financials of partnership
3	Companies (Institutional and Corporate)	Name of Company and its Directors Registered Address Telephone number (s) Contact persons Registered number & NTN	Copy of CNIC/ passport of all Directors  Audited Accounts of the company  Memorandum and Article of Association  Board Resolution authorizing investments  Certificate of Incorporation/ Commencement of Business  List of Authorized Signatories along with copy of CNICs and power attorney
4	Clubs, Societies and Associations	<ul> <li>Name of Club, Society or Association</li> <li>Registered address of Club, Society or Association</li> <li>Telephone numbers(s)</li> <li>Contact Persons</li> </ul>	Board / Governing Body Resolution for investment Certified copy of bylaws/ rules and regulations Copy of CNIC of Board's members Certified copy of certificate of Registration List of Authorized Signatories along with copy of CNICs and power attorney Copy of latest financials
5	Trusts including, but not limited to, Provident Fund, Gratuity Fund, Pension Fund, Mutual Fund, etc.)	<ul> <li>Name of trust, Fund etc</li> <li>Name of Trustee</li> <li>Address of Trust/ Fund etc.</li> <li>Telephone number(s)</li> <li>Contact persons</li> </ul>	Copy of CNIC of all Trustees Certified copy of Trust Deed Trustee / Governing body Resolution for investment Copy of the latest financials of the Trust List of Authorized Signatories along with copy of CNICs and power attorney
6	Executors and Administrators	<ul> <li>Name of Entity for Executor/Admin. is appointed</li> <li>Name of Executor/Administrator</li> <li>Address of entity &amp; Tele Numbers</li> </ul>	Copy of CNIC of Executor/Administrator Certified copy of the letter of Administration
7	Government Entities	<ul> <li>Name of Government owned organization</li> <li>Address of Government owned organization</li> <li>Telephone numbers</li> <li>Contact persons</li> </ul>	A Special Resolution/ authority endorsed by the Ministry of Finance or Finance Department from concerned Government (Federal/ Provincial/Local) clearly listing the persons/ officers authorized to operate such account  List of Authorized Signatories  Copy of CNIC of authorized officer(s)  Resolution authorizing investment

### 4. Principles of CDD/ KYC

- 4.1 MSK has structured few principles for the effective implementation of KYC policy. These principles shall be applicable to all the existing and new customers, details of which are as follows;
- 4.1.1 Payment in cash or bearer instruments, above Rs. 25000 shall be strictly prohibited; Further, receipt of cash above 25000 on any day, in case of exceptional circumstances like loss of margin, bounced cheques, overdue payment etc should be reported to Exchange as per relevant rules and regulations
- 4.1.3 Government account shall not be opened in the personal names of the Government Official(s);
- 4.1.4 CDD/ KYC measures shall be enhanced for High Risk Customers. Characteristics of High Risk Customers are given in **Section 7** of this policy;
- 4.1.5 Dealing with any Political Exposed Person or customers holding public or high Profile position, relationship with them should be discouraged and only in case of long and comfortable relationship be established and/ or maintained with the approval of Senior Management of MSK including if any existing customer Becomes holder of any public office or high profile position;
- 4.1.6 MSK must 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
- 4.1.7 For customers that are legal persons or for legal arrangements, MSK is required to take reasonable measures to understand (i) the ownership and control structure of the Company (ii) determines that who own or control the company. This includes those Persons who exercise ultimate effective control over a company;
- 4.1.8 In case MSK is not able to satisfactorily complete the required CDD/ KYC measures, Account should not be opened, business relationship should not be established and Business transaction should not be carried out. Similarly, relationship with existing customer should be Terminated CDD/ KYC is Found unsatisfactory;
- 4.1.9 Any exception (including suspicious transaction) identified in fulfilling the criteria/guidelines laid down in this policy shall be clearly indicated in writing and referred To the Chief Executive Officer (CEO) in order to decide future course of action; and

- 4.1.10 A copy of any exception (including suspicious transaction) reporting to CEO shall Also be submitted to Compliance Department
- 4.1.11 If a customer is acting on behalf of another customer, his identity should be ascertained and relevant documents should also be obtained
- 4.1.12 The simplified check list should also very broadly cover the investment outlook and risk appetite of the customer, which along with the profile helps build the risk assessment of customer
- 4.1.13 On a very broad scope, also evaluate in a generalized manner the risk appetite, investment horizons, stock preference like sharia compliant etc, to evaluate the customers risk appetite and risk profile

#### 5. Verification

- 5.1 Verification is an integral part of CDD/ KYC measures for which MSK is required to ensure the following areas;
- 5.1.1 Before opening an account, MSK shall verify the signature of the account holder is verified from the bank in Sub Account Opening Form
- 5.1.2 For this purpose, MSK will not open any account without UIN approval from National Clearing Company of Pakistan (NCCPL)
- 5.1.3 Priority should be given to clients visit at the time of account opening. Faceless / online, should be verified by third party

#### 6. Record Updation & Data Maintenance

- 6.1 CDD/ KYC should not be contemplated as a onetime exercise at the time entering into Relationship with the customers. It should be viewed as an ongoing process and should encompass the followings;
- 6.1.1 Concerned person will provide the list of discrepant/ incomplete documents to senior management time to time, for necessary follow up and approval
- 6.1.2 Maintain proper records of customer identifications and clearly indicate in writing any exception in fulfilling CDD/ KYC measures these exceptions will be referred to The CEO to decide future course of action

#### 7. High Risk Customers & Low Risk Customers

- 7.1 MSK is required to conduct enhanced customers due diligence if the customers falls within the definition of High Risk Customers, which are defined as under;
- 7.1.1 Non-resident customers;
- 7.1.2 Non-legal persons or arrangements including non-governmental organizations (NGOs) / Not for profit organizations (NPOs) and Trusts/charitable trust;
- 7.1.3 Customer with links to offshore tax havens;
- 7.1.4 Customers dealing in high-value items;
- 7.1.5 Politically Exposed Persons (PEPs). Those individuals who are or who have been Entrusted with prominent public functions in a country or territory, for example Heads of state or of government, senior politicians, senior government, judicial or Military officials, senior executives of state owned entities, important political party Officials but not middle ranking or more junior individuals in these categories;
- 7.1.6 The MSK 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. MSK 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. there is reason to believe that the customer has been refused brokerage services by another brokerage house;
  - vii. Non-face-to-face / on-line customers;
  - viii. establishing business relationship or transactions with counterparts from or in countries not sufficiently applying FATF recommendations; and
  - ix. Politically Exposed Persons (PEPs) or customers holding public or high profile positions
  - 7.1.7 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

- 7.1.8 MSK should conduct a self assessment for money laundering and terrorist financing risk, identifying and documenting the key risks presented to it.
- 7.1.9 Customers from or in countries where CDD/ KYC and anti-money laundering Regulations are lax and are not sufficiently applying Financial Action Task Force (FATF) recommendations
- 7.1.10 Customers who have been refused by another financial institution (based on Reasonable information)
- 7.1.11 While dealing with the high-risk customers including the PEPs, the MSK should:
  - a) 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;
- 7.1.12 If the MSK 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
- 7.2 For Low Risk Customers, MSK may apply simplified or reduced CDD/ KYC measures. A client may be considered under Low Risk category, if the identity of the customer(s) and the beneficial owner of a customer are publicly known or where adequate checks and controls exist
- 7.3 Following cases may be considered as Low Risk Customers for application of simplified or reduced CDD/ KYC:
- 7.3.1 Financial institutions provided they are subject to requirements to combat money Laundering and terrorist financing and are supervised for compliance with those Requirements;
- 7.3.2 Public listed companies that are subject to regulatory disclosure requirements, Government administrations/entities.

### 8. Screening and Verification

8.1 MSK shall develop and implement appropriate screening viz 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

8.2 MSK must provide any information concerning its clients and their transactions to the exchanges, Financial Monitoring Unit or the Commission as and when required

#### 9. Procedures for Compliance

- 9.1 All new account opening forms should be reviewed and authorized by compliance Officer
- 9.2 A periodic meeting of compliance officer, CDC in charge and back office in charge Should take place and review all the existing policies and procedures as well all the New directives / guidelines and report to the CEO
- 9.3 MSK should set up a compliance function with suitable human resource and MIS reporting capabilities, enabling it to effectively monitor the clients' transactions and make Timely reports
- 9.4 The Head of Compliance function must have skills and experience necessary for Satisfactory performance of functions assigned and report directly to Board of Directors
- 9.5 Retain the essential data / record for future inspection by regulatory authorizes as per Rules and regulations

### 10 Anti Money Laundering

MSK must comply with the requirements of Anti Money Laundering Act, 2010 as applicable on them, including and any directives, circulars, guidelines issued in this regard by Federal Government, Financial Monitoring Unit and SECP.

# **Annexure I**

# **KYC / CDD Checklist**

Date	Account Title	Account / UIN #

# **SECTION A**

	ents to be provided by Investor		
		Pls tick	Pls tick
1. Individuals/Sole Proprietorships	2. Partnerships	3. Institutions/Corporates	
CNIC of Principal and Joint Holders / Passport for Foreign Nationals / NICOP for non-resident Pakistanis	CNICs/NICOP of all partners, as applicable	CNIC / NICOP of Authorized Signatories and Directors	
Proof of Employment/Business	Partnership Deed	List of Directors and Officers	
NTN Certificate, where available	Latest financial statements	NTN Certificate	
	Certificate of Registration (in case of registered partnership firm)	Documentary evidence of Tax Exemption (if applicable)	
	NTN Certificate	Certificate of Incorporation	
		Certificate of Commencement of Business	
		Certified Copy of Board Resolution	
		Memorandum & Articles of Association/ Bye Laws/ Trust Deed	
		Audited Accounts of the Company	
4. Trusts	5. Clubs Societies and Associations	6. Executors/Administrators	
CNICs of all trustees	Certified copy of certificate of Registration	CNICs of all Executors/Administrators	
Certified copy of the Trust Deed	List of members	Certified copy of Letter of Administration	
Latest financials of the trust	CNIC/NICOP of members of Governing Board		
Documentary Evidence of Tax Exemption (if applicable)	Certified copy of bylaws/rules and regulations		
Trustee/Governing Body Resolution	Copy of latest financials of Society/Association		
	Board/Governing Body Resolution		

List	anv	missing	documents /	' information	below:

1

2

#### **SECTION B**

SECTION B		
Assessment of information provided in section A		
Based on information provided in A,		
1. Is the investor also the ultimate beneficiary of the funds to be invested	YES	NO
If NO, joint account should be opened or power of attorney be provided by ultimate beneficiary with relevant documentary details of the beneficiary		
2. In case the Investor is a <b>private company</b> , IS the latest shareholders' list available	YES	NO
3. In case of Government Accounts,		
Mark YES if the account is <b>not</b> in the personal name of the government official	YES	NO
A resolution / authority letter (duly endorsed by Ministry of Finance or Finance Department of concerned government) is available, which authorizes the opening and operating of this account by an officer of federal / provincial / local government in his / her official capacity		

## **SECTION C**

Tubic Cutcher, of Investor	se tick ox	
1. Government Department / Entity	LOW RISK	Go to Section G.1
2. Public listed company	LOW RISK	Go to Section G.1
3. Private limited company	MEDIUM RISK	Go to Section G.2
4. Non-Governmental Organization (NGO)	HIGH RISK	Go to Section G.3
5. Trust / Charity	HIGH RISK	Go to Section G.3
6. Unlisted Financial institution		Go to Section D
7. Individual		Go to Section E

#### **SECTION D**

Unlisted Private Financial Institution (NBFI)		
Is the unlisted private financial institution domiciled in Pakistan and is regulated by the SECP/State Bank of Pakistan (SBP)  OR  Is it domiciled in a FATF member country that is satisfactorily following the FATF recommendations and is supervised by a regulatory body	YES YES	NO NO

# **SECTION E**

Individual		
	i	I
1. Is the person a non-resident Pakistani	YES	NO
2. Is the person a high net worth individual with no identifiable source of income or his/her profile/source of income doesn't match with size & quantum of investments/	YES	NO
3. Is the person involved in dealing in high value items (based on declared occupation)	YES	NO
4. Is the person a foreign national	YES	NO
5. Does the person appear to have links or money transfer to/from offshore tax havens or belongs to country(s) where KYC/CDD and anti money laundering regulations are lax (in terms of not sufficiently applying FATF recommendations)	YES	NO
6. Is there any reason to believe that the person has been refused account opening by another financial institution / brokerage house	YES	NO
7. Is the person opening the brokerage account on a non-face-to-face basis/on-line	YES	NO
If the response to any question (1-7) above was 'YES', proceed to Section	on G.3	
8. Is the person a holder of a senior level public (government) office i.e. a politically exposed person (PEP) or a family member of PEP.	YES	NO
9. Is the person a holder of high profile position (e.g. senior politician)	YES	NO
If the response to any question (8-9) above was 'YES', proceed to Section G.1	ion F,	

#### **SECTION F**

Politically Exposed Person / Foreign National / Hol	lders of High Profile Position		
Is the brokerage account relationship with this high risk exposed person / foreign national / holder of high profile Director, CEO / COO of the brokerage house (approval through signing the respective Account Opening Form)	position, approved by the Nominee	YES	NO
If YES, proceed to Section G.3	If NO, proceed to Sec	tion G.4	

# **Annexure II**

KNOW YOUR CUSTOMER (KYC) FOR INDIVIDUALS				
(TO BE FILLED BY THE ACCOUNT HOLDER)				
Name of Applicant: Father's / Husband's Name:				
Marital Status: Single Married Separated Divorced Male Female Widowed				
Qualification: Matric/O level Inter/A level Bachelors Masters & Above				
City: Sarachi Slamabad Shore Others (specify) Country				
Type of Accommodation: House Apartment Portion				
Residence is: Owned Rented Mortgage Parents Company Provided				
Occupation: Agriculturist Business Housewife Retired Person Student Service				
Industrialist Professional Business Executive Others (specify)				
Occupation Details: Employer / Business Name: Designation:				
Nature of Business:    Tenure:				
Sources of Income: Salaried Business Others (specify)				
Account Mode: Online Offline				
Expected Value of Investment: Up to Rs. 500,000/- Up to Rs. 1,500,000/- Up to Rs. 2,500,000 More than Rs. 2,500,000/-				
Knowledge of Stock Market: Yes No				
Sources of fund for Stock Investment: Loan / Borrowed Own Investment Collective Investment				
Do you have any Investor Account? Yes, then Investor Account #: No				
Do you / your family member have any other account in MSK?  Yes, then give name(s);				
REFERENCE DETAILS				
Name: Occupation: Contact #:				
Address:				
(TO BE FILLED BY THE JOINT ACCOUNT HOLDER (1))				
Name of Joint Applicant: Father's / Husband's Name:				
Marital Status: Single Married Separated Divorced Male Female Widowed				
Qualification:         Matric/O level         Inter/A level         Bachelors         Masters & Above				
City: Karachi Islamabad Lahore Others (specify) Country				

	Type of Accommodation: House Apartment Portion				
Residence is: Owned Rented Mortgage Parents Company Provided					
Occupation: Agriculturist Business Housewife Retired Person Student Service					
Industrialist Professional Business Executive Oth	ners (specify)				
Occupation Details: Employer / Business Name:	Designation:				
Nature of Business:	Tenure:				
Sources of Income: Salaried Business Others (specify)					
Account Mode: Online Offline					
Expected Value of Investment: Up to Rs. 500,000/- Up to Rs. 1,500,000/- 2,500,000/-	Up to Rs. 2,500,000 More than Rs.				
Knowledge of Stock Market: Yes No					
Sources of fund for Stock Investment: Loan / Borrowed Own Investment	Collective Investment				
Do you have any Investor Account? Yes, then Investor Account #:	No				
Do you / your family member have any other account in MSK?  Yes, then give	name(s);No				
REFERENCE DETAILS					
Name: Occupation:	Contact #:				
Address:					
(TO BE FILLED BY THE JOINT ACCOUNT HOLDER (2))					
	Name of Applicant: Father's / Husband's Name:				
Name of Applicant: Father's / Husband's	Name:				
	Name:  vorced Gender Male Female				
Marital Status: Single Married Separated Div					
Marital Status: Single Married Separated Dividowed  Qualification: Matric/O level Inter/A level Bachelors Mas	vorced Gender Male Female				
Marital Status: Single Married Separated Dividowed  Qualification: Matric/O level Inter/A level Bachelors Mas	vorced Gender Male Female				
Marital Status: Single Married Separated Divided Qualification: Matric/O level Inter/A level Bachelors Mass	vorced Gender Male Female				
Marital Status: Single Married Separated Dividence Matric/O level Inter/A level Bachelors Mass  City: Karachi Islamabad Lahore Others (sp. Type of Accommodation: House Apartment Portion	Gender Male Female  Sters & Above  Pecify) Country  Company Provided				
Marital Status: Single Married Separated Dividence Matric/O level Inter/A level Bachelors Mass  City: Karachi Islamabad Lahore Others (sp. Apartment Portion  Residence is: Owned Rented Mortgage Parents  Occupation: Agriculturist Business Housewife Retired Person	Gender Male Female  Sters & Above  Pecify) Country  Company Provided				
Marital Status: Single Married Separated Dividence Matric/O level Inter/A level Bachelors Mass  City: Karachi Islamabad Lahore Others (sp. Apartment Portion  Residence is: Owned Rented Mortgage Parents  Occupation: Agriculturist Business Housewife Retired Pers	Gender				
Marital Status: Single Married Separated Dividence Married: Separated Dividence Matric/O level Inter/A level Bachelors Mass  City: Karachi Islamabad Lahore Others (sp. Apartment Portion  Residence is: Owned Rented Mortgage Parents  Occupation: Agriculturist Business Housewife Retired Personal Business Executive Others	Gender				

Account Mode: Online Offline					
Expected Value of Investment: Up to Rs. 500,000/- Up to Rs. 1,500,000/- Up to Rs. 2,500,000 More than Rs. 2,500,000/-					
Knowledge of Stock Market: Yes	No				
Sources of fund for Stock Investment:	Loan / Borrowed	Own Investment Colle	ective Investment		
Do you have any Investor Account?	Yes, then Investo	or Account #:		No	
Do you / your family member have any other	er account in MSK?	Yes, then give name(s);		No	
	REFER	ENCE DETAILS			
Name:	Occupation:		Contact #:		
Address:		1			
(ТО ВЕ	FILLED BY THE	JOINT ACCOUNT HOLI	DER (3))		
Name of Joint Applicant:		Father's / Husband's Name:			
Marital Status: Single Widowed	Married	Separated Divorced	Gender	Male Female	
Qualification: Matric/O level	Inter/A level	Bachelors Masters & Abo	ove		
City: Karachi	Islamabad Lah	nore Others (specify)	Country		
Type of Accommodation: House	e Apartment	Portion			
Residence is: Owned Rente	ed Mortgage	Parents Company	y Provided		
Occupation: Agriculturist E	Business House	wife Retired Person	Student Service		
Industrialist Pro	ofessional Busine	ess Executive Others (speci	fy)		
Occupation Details: Employer / Bus	iness Name:		Designation	on:	
Nature of Busine	ess:	Te	nure:		
Sources of Income: Salaried Business Others (specify)					
Account Mode: Online Offline					
<b>Expected Value of Investment:</b> Up to Rs. 500,000/- Up to Rs. 1,500,000/- Up to Rs. 2,500,000 More than Rs. 2,500,000/-					
Knowledge of Stock Market: Yes No					
Sources of fund for Stock Investment: Loan / Borrowed Own Investment Collective Investment					
Do you have any Investor Account? Yes, then Investor Account #: No					
Do you / your family member have any other account in MSK?  Yes, then give name(s);  No					

REFERENCE DETAILS				
Name:	Occupation:		Contact #:	
Address:				