



# ARYA ONE GLOBAL IFSC LLP

## Anti-Money Laundering (AML)/Counter-Terrorism Financing (CFT) and Know Your Customer (KYC) Policy

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Version 2.0 | Dated April 1, 2026

### 1. Objective and Scope

This Policy outlines the framework for the prevention of money laundering (ML), terrorism financing (TF), and the implementation of robust KYC norms at Arya One Global IFSC LLP ("the Firm"), a Fund Management Entity registered under the IFSCA (Fund Management) Regulations, 2022.

It ensures compliance with:

- IFSCA (AML, CFT & KYC) Guidelines, 2022;
- The Prevention of Money Laundering Act, 2002 and associated Rules;
- IFSCA (Fund Management) and (BATF) Regulations as applicable;
- Global best practices and FATF recommendations.

### 2. Key Definitions

- Client: Any investor or participant engaging with the Fund(s) managed by the Firm.
- Investor: Shareholder or partner of a Fund or scheme managed by the Firm.
- Beneficial Owner: A natural person who ultimately owns or controls a client/investor as defined under Rule 9 of the PML Rules.
- PEP: Politically Exposed Person.
- STR: Suspicious Transaction Report.
- Designated Person: Any person/entity appearing on UN/OFAC/FIU-IND or other applicable sanctions lists.

### **3. Governance and Responsibilities**

- Principal Officer: A senior-level officer responsible for AML compliance, STR filings, and liaison with regulatory authorities.
- Compliance Officer: Responsible for day-to-day AML/KYC compliance, risk classification, and internal controls. Accountable for oversight, review, and approval of AML/KYC policies and risk mitigation strategies.

### **4. KYC and Client Due Diligence (CDD)**

#### **4.1 Identification & Verification**

- Obtain and verify information using Officially Valid Documents (OVDs) for individuals and legal persons.
- Ensure identification of:
  - Natural persons;
  - Beneficial owners;
  - Authorized signatories;
  - Connected parties.

#### **4.2 Risk-Based Categorization**

Clients and investors shall be classified into:

- Low Risk (Green) – e.g. regulated financial institutions, government entities.
- Medium Risk (Yellow) – domestic corporates, HNIs.
- High Risk (Red) – PEPs, clients from high-risk jurisdictions, trusts, or clients with complex structures.

### **5. Enhanced Due Diligence (EDD)**

EDD will be triggered in the following cases:

- Clients/investors in red risk category;
- PEPs or their close associates;
- High-risk countries/jurisdictions;
- Unusual transaction patterns.

EDD includes:

- Source of wealth/funds verification;
- Independent adverse media screening;
- Ongoing enhanced monitoring.

## **6. Simplified Due Diligence (SDD)**

Permitted for low-risk clients such as regulated financial institutions or listed companies, after approval by the Principal Officer.

## **7. Sanctions and Blacklists**

- All clients/investors screened against:
- UN Security Council Sanctions Lists;
- OFAC and EU lists;
- FIU-IND and SEBI lists.
- Accounts or transactions with listed persons/entities shall be blocked and reported.

## **8. Ongoing Monitoring and Review**

- Continuous monitoring of transactions and client profiles;
- Review of KYC data periodically based on risk category:
- Low Risk – every 3 years
- Medium Risk – every 2 years
- High Risk – annually

## **9. Suspicious Transaction Reporting**

- STRs shall be filed with the FIU-IND promptly upon detection.
- Internal escalation process is defined, with confidentiality ensured at all levels.

## **10. Record Keeping**

Maintain:

- KYC records for 5 years after the cessation of relationship;
- Transaction records for at least 5 years from date of transaction.

## **11. Training and Awareness**

- Periodic AML/CFT training for all employees;

- Mandatory induction training for new hires;
- Special sessions for front line and compliance staff.

## **12. Outsourcing and Third-Party Reliance**

- Outsourcing of AML functions allowed under IFSCA guidelines with appropriate oversight and due diligence.
- Third-party reliance permitted where the party is FATF-compliant and under formal agreement.

## **13. Technology and Screening Tools**

- Use of automated tools like **World Check, Refinitiv, or LexisNexis for screening;**
- Secure systems to store KYC/AML data and risk flags.

## **14. Policy Review**

This policy shall be reviewed annually or in response to significant regulatory changes.

**Approved By:**

**Governing Body**

Effective Date: April 1, 2026

Review Cycle: Annual / As required