

STRONGMANS SECURITIES (PRIVATE) LIMITED

Customer Due Diligence/ Know Your Customer (CDD/ KYC) Policy


COMPANY SECRETARY
STRONGMAN SECURITIES (PVT) LTD.

• Introduction

- Strongman Securities (Pvt.) Limited 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) Circular No. 12 of 2009 dated April 28, 2009.
- The CDD/ KYC policy has been approved by the Board of Strongman Securities (Pvt.) Limited in the meeting held on August 27, 2014. In the said meeting, the Board has authorized the CEO to approve any subsequent amendments or modifications associated with this policy. Furthermore, it was also clarified that the first exercise conducted for CDD/ KYC measures, as required under clause 6.1.1 of this policy.
- This policy defines different types of customers, their minimum required information & documents along with the characteristics of High Risk Customers, who pose greater than average risk of money laundering activities. It further explains how to ensure the identity of the clients, who initiates relationship with Strongman Securities (Pvt.) Limited and how to maintain and update the CDD/ KYC measures for existing customers.
- For better services to our customers, Strongman Securities (Pvt.) Limited has also developed and put in place a “KYC Form” which classifies the categories of CDD/ KYC for both Individual and Institutional clients. Strongman Securities (Pvt.) Limited Sales Team/ sales agent/ channel partners 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.
- The KYC Form is attached as Appendix I and shall be considered as integral part of CDD/ KYC policy.


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Scope

- The scope of CDD/ KYC policy is to establish reasonable measures to know about the customers of Strongman Securities (Pvt.) Limited, whether individual or institutional, in accordance with the stated guidelines by the Commission.
- The scope of the policy is concerned with the staff of Strongman Securities (Pvt.) Limited and to those whose services are in place under the Distribution Agreements such as channel partners. For this purpose, training with respect to CDD/ KYC to the concerned staff of Strongman Securities (Pvt.) Limited and channel partners shall be carried out on regular basis.



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3. Type of Customers, Information & Documents Required

3.1 Strongman Securities (Pvt.) Limited shall obtain the minimum information/ set of documents from various types of customers details of which are as follows:

1 Individuals / Sole proprietor ship	Name and Father's Name Address Telephone Number(s) 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 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	Name of Club, Society or Association Registered address of Club, Society or Association Telephone numbers(s) Contact Persons	Board / Governing Body Resolution for investment Certified copy of by laws/ 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.)	Name of trust, Fund etc Name of Trustee Address of Trust/ Fund etc. Telephone number(s) Contact persons	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	Name of Entity for Executor/ Admin. is appointed Name of Executor/ Administrator Address of entity & Tele Numbers	Copy of CNIC of Executor/Administrator Certified copy of the letter of Administration.
7 Government Entities	Name of Government owned organization	A Special Resolution/ authority endorsed by the Ministry of Finance or Finance Department from concerned Government (Federal/ Provincial/

4. Principles of CDD/ KYC

4.1 Strongman Securities (Pvt.) Limited 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 shall be strictly prohibited;
- 4.1.2 Third party cheques shall be strictly prohibited;
- 4.1.3 Any account which has zero balance for a period of more than one year will be considered as "Dormant Account"
- 4.1.4 Government account shall not be opened in the personal names of the Government Official(s);
- 4.1.5 Operation Department will provide the list of discrepant/ incomplete documents in coordination with Transfer Agent to Investment Advisory Department within thirty days after every calendar year, who shall obtain all required information/ documents from existing customers;
- 4.1.6 CDD/ KYC measures shall be enhanced for High Risk Customers. Characteristics of High Risk Customers are given in Section 7 of this policy;
- 4.1.7 Dealing with any Political Exposed Person or customers holding public or high profile position, relationship with them should be established and/ or maintained with the approval of Senior Management of Company including if any existing customer becomes holder of any public office or high profile position;
- 4.1.8 For customers that are legal persons or for legal arrangements, Strongman Sec. is required to take reasonable measures to understand (i) the ownership and control structure of the company (ii) determine that who own or control the company. This includes those persons who exercise ultimate effective control over a company;
- 4.1.9 In case Strongman Securities (Pvt.) Limited 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. Instead reporting of suspicious transaction is considered. Similarly, relationship with existing customer should be terminated and reporting of suspicious transactions be considered if CDD/ KYC is found unsatisfactory;
- 4.1.10 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
- 4.1.11 A copy of any exception (including suspicious transaction) reporting to CEO shall also be submitted to Internal Audit & Compliance Department.

5. Verification

5.1 Verification is an integral part of CDD/ KYC measures for which Strongman Securities (Pvt.) Limited is required to ensure the following areas;

5.1.1 Before opening an account, Strongman Securities (Pvt.) Limited shall verify the copy of CNIC from NADRA.

The cost of verification of CNIC from NADRA shall not be passed on to the existing or prospective account holder of Strongman Securities (Pvt.) Limited.

6. Record Updation & Retention

6.1 CDD/ KYC should not be contemplated as a one time 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 Operation Department will provide the list of discrepant/ incomplete documents to Investment Advisory Department within thirty days after every calendar year and Investment Advisory shall provide discrepant/ incomplete information to Operations Department for record maintenance and updation;
- 6.1.2 Investment Advisory shall carry out regular training to the Strongman Securities Sales team and to the Channel partners on the updation of clients information and records; and
- 6.1.3 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.

6.2 Furthermore, Strongman Securities shall keep records regarding the identification data obtain through
The customer due diligence process (e.g. copies or records of official identification documents like passports, identity cards, driving licenses or similar documents) account files and business correspondence for at least 5 (five) years after the business relationship is ended.

7. Risk Profile (High Risk Customers/ Low Risk Customers)

7.1 Strongman Securities is required to conduct enhanced customer 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 High net worth customers with no clearly identifiable source of income;
- 7.1.5 Customers dealing in high-value items;
- 7.1.6 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;
- 7.1.7 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; and
- 7.1.8 Customers who have been refused by another financial institution (based on reasonable information).

7.2 For Low Risk Customers, Strongman Securities (Pvt.) Ltd. 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; and

7.3.2 Public listed companies that are subject to regulatory disclosure requirements, Government administrations/entities.



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