SAMUNNATI FINANCE PRIVATE LIMITED	
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'Know Your Customer' (KYC) Guidelines – Anti Money Laundering (AML) – Sanction Screening Standards

1. Introduction

Reserve Bank of India (RBI) on February 25, 2016 (bearing ref no. **RBI/DOR/2025-26/361 ;DOR.AML.REC.No.280/14.01.003/2025-26 dated November 28, 2025** notified the **Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025** inter alia, directing that every Regulated Entity (RE) shall have a Know your customer (KYC) Policy duly approved by the Board of Directors. These directions have been issued by the RBI in terms of the provisions of Prevention of Money-Laundering Act, 2002 (**PMLA**) and the Prevention of Money-Laundering (Maintenance of Records) Rules 2005. The Frequently Asked Questions (FAQs) on KYC may be accessed at

Reserve Bank of India - Frequently Asked Questions (rbi.org.in)."

The policy also includes the requirements of screening our customers against the sanctions lists to ensure that the identity of the customer does not match with any person or entity whose names appear in the sanctions lists.

2. General Guidelines

The information collected from the customer for the purpose of opening of account should be kept confidential and any details thereof should not be divulged for cross-selling or any other purposes. Samunnati Finance Private Limited hereinafter referred to as "SAMUNNATI" would ensure that information sought from the customer is relevant to the perceived risk, is not intrusive, and is in conformity with the guidelines issued in this regard. Any other information from the customer should be sought separately with his/her consent and after opening the account.

3. Definitions

3.1 "Aadhaar number" shall have the meaning assigned to it in clause (a) of section 2 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 (18 of 2016);

3.2 "Act" and "Rules" means the Prevention of Money-Laundering Act, 2002 and the Prevention of Money-Laundering (Maintenance of Records) Rules, 2005, respectively and amendments thereto.

3.3 "Authentication", in the context of Aadhaar authentication, means the process as defined under sub-section (c) of section 2 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016.

3.4 Beneficial Owner (BO) shall have the meaning as per table below:

Type of Customer	Persons to be considered Beneficial Owners (BOs)
Companies	a) A natural person who, whether acting alone or together, or through one or more juridical person, has/have an ownership of or entitlement to more than 10 percent of shares or capital or profits of the company; or b) A natural person who whether acting alone or together, or through one or more juridical person, has/have the right to appoint majority of directors or to control the management or policy decisions including by virtue of their shareholding or management rights or shareholders agreements or voting agreements.
Partnership Firm	A natural person who, whether acting alone or together, or through one or more juridical person, has/have an ownership of/ entitlement to more than 10 percent of capital or profits of the partnership; or who exercises control through other means ("control" shall include the right to control the Management or policy decision)
Unincorporated association of persons or body of individuals	a) A natural person who whether acting alone or together, or through one or more juridical person, has/have an ownership of/ entitlement to more than 15 percent of property or capital or profits of such association or body of individuals. b) Term 'body of individuals' includes societies.
Trust/ Foundation	a) Identification of the Author of the trust; or b) Identification of the Trustees; or c) The Beneficiaries of the trust with 10 percent or more interest in the trust; or d) A natural person exercising ultimate effective control over the trust through a chain of control or ownership
Where no natural person is identified	For Companies, Partnership Firm or Unincorporated association of persons or body of individuals, where no natural person is identified, the beneficial owner is the relevant natural person who holds the position of senior managing official

"Certified Copy of Aadhar" - Obtaining a certified copy by SAMUNNATI shall mean comparing the copy of the proof of possession of Aadhaar number where offline verification cannot be carried out or officially valid document so produced by the customer with the original and recording the same on the copy by the authorized officer of SAMUNNATI as per the provisions contained in the ACT.

Provided that in case of Non-Resident Indians (NRIs) and Persons of Indian Origin (PIOs), as defined in Foreign Exchange Management (Deposit) Regulations, 2016 {FEMA 5(R)}, alternatively, the original certified copy, certified by any one of the following, may be obtained:

a) authorized officials of overseas branches of Scheduled Commercial Banks registered in India,
b) branches of overseas banks with whom Indian banks have relationships,
c) Notary Public abroad,
d) Court Magistrate,
e) Judge,
f) Indian Embassy/Consulate General in the country where the non-resident customer resides.

3.5 "Central KYC Records Registry" (CKYCR) means an entity defined under Rule 2(1) of the Rules, to receive, store, safeguard and retrieve the KYC records in digital form of a customer.

3.6 "Designated Director" means a person designated by SAMUNNATI to ensure overall compliance with the obligations imposed under chapter IV of the PML Act and the Rules. In the case of SAMUNNATI, the Designated Director is Mr. N. Gurunath (Whole Time Director).

a) The name, designation and address of the Designated Director shall be communicated to the FIU-IND
b) Further, the name, designation, address and contact details of the Designated Director shall also be communicated to the RBI.

c) The Principal Officer should not be nominated as the "Designated Director".

3.7 "Principal Officer" means an officer at the management level nominated by SAMUNNATI, responsible for furnishing information as per rule 8 of the Rules. With a view to enable the PO to discharge his responsibilities, the PO and other appropriate staff should have timely access to customer identification data and other CDD information, transaction records and other relevant information. Further, SAMUNNATI should ensure that the PO is able to act independently and report directly to the Senior Management or to the Board of Directors. The role and responsibilities of the PO should include overseeing and ensuring overall compliance with regulatory guidelines on KYC/AML/CFT issued from time to time and obligations under the Prevention of Money Laundering Act, 2002, rules and regulations made thereunder, as amended from time to time. The Chief Compliance Officer, Mr. C S Ramakrishnan is nominated as the "Principal Officer" .

a) The name, designation and address of the Principal Officer shall be communicated to the FIU-IND
b) Further, the name, designation, address and contact details of the Principal Officer shall also be communicated to the RBI.

3.8 “Senior Management” for the purpose of KYC compliance are following:

1. Designated Director of SAMUNNATI
2. Principal officer of SAMUNNATI

3.9 “Digital KYC” means the capturing live photo of the customer and officially valid document or the proof of possession of Aadhaar, where offline verification cannot be carried out, along with the latitude and longitude of the location where such live photo is being taken by an authorized officer of SAMUNNATI as per the provisions contained in the Act.

3.10 “Digital Signature” shall have the same meaning as assigned to it in clause (p) of subsection (1) of section (2) of the Information Technology Act, 2000 (21 of 2000).

3.11 “Equivalent e-document” means an electronic equivalent of a document, issued by the issuing authority of such document with its valid digital signature including documents issued to the digital locker account of the customer as per rule 9 of the Information Technology (Preservation and Retention of Information by Intermediaries Providing Digital Locker Facilities) Rules, 2016.

3.12 “Group” – The term “group" shall have the same meaning assigned to it in clause (e) of sub-section (9) of section 286 of the Income-tax Act,1961 (43 of 1961).

3.13 “Know Your Client (KYC) Identifier” means the unique number or code assigned to a customer by the Central KYC Records Registry.

3.14 “Non-profit organizations” (NPO) means any entity or organization, constituted for religious or charitable purposes referred to in clause (15) of section 2 of the Income-tax Act, 1961 (43 of 1961), that is registered as a trust or a society under the Societies Registration Act, 1860 or any similar State legislation or a company registered under Section 8 of the Companies Act, 2013 “(18 of 2013).

3.15 Officially Valid Document” (OVD) means the passport, the driving license, proof of possession of Aadhaar number, the Voter's Identity Card issued by the Election Commission of India, job card issued by NREGA duly signed by an officer of the State Government and letter issued by the National Population Register containing details of name and address.

3.16 “Offline verification” shall have the same meaning as assigned to it in clause (pa) of section 2 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 (18 of 2016).

3.17 “Person” has the same meaning assigned in the Act and includes:

a) an individual,

b) a Hindu undivided family,

c) a company,

d) a firm,

e) an association of persons or a body of individuals, whether incorporated or not

f) every artificial juridical person, not falling within any one of the above persons (a to e), and

g) any agency, office or branch owned or controlled by any of the above persons (a to f).

3.18 “Suspicious transaction” means a “transaction” as defined below, including an attempted transaction, whether or not made in cash, which, to a person acting in good faith:

a. gives rise to a reasonable ground of suspicion that it may involve proceeds of an offence specified in the Schedule to the Act, regardless of the value involved; or

b. appears to be made in circumstances of unusual or unjustified complexity; or

c. appears to not have economic rationale or bona-fide purpose; or

d. gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

Explanation: Transaction involving financing of the activities relating to terrorism includes transaction involving funds suspected to be linked or related to, or to be used for terrorism, terrorist acts or by a terrorist, terrorist organization or those who finance or are attempting to finance terrorism.

3.19 “Transaction” means a purchase, sale, loan, pledge, gift, transfer, delivery, or the arrangement thereof and includes:

- opening of an account.
- deposit, withdrawal, exchange or transfer of funds in whatever currency, whether in cash or by cheque, payment order or other instruments or by electronic or other non-physical means;
- the use of a safety deposit box or any other form of safe deposit.
- entering into any fiduciary relationship
- any payment made or received, in whole or in part, for any contractual or other legal obligation; or
- establishing or creating a legal person or legal arrangement.

Terms bearing meaning assigned in this Direction, unless the context otherwise requires, shall bear the meanings assigned to them below:

a) "Common Reporting Standards" (CRS) means reporting standards set for implementation of multilateral agreement signed to automatically exchange information based on Article 6 of the Convention on Mutual Administrative Assistance in Tax Matters.

b) "Customer" means a person who is engaged in a financial transaction or activity with SAMUNNATI and includes a person on whose behalf the person who is engaged in the transaction or activity, is acting.

c) "Customer Due Diligence (CDD)" means identifying and verifying the customer and the beneficial owner using reliable and independent sources of identification. The CDD, at the time of commencement of an account-based relationship, shall include:

- Identification of the customer, verification of their identity using reliable and independent sources of identification, obtaining information on the purpose, and intended nature of the business relationship, where applicable,
- Taking reasonable steps to understand the nature of the customer's business, and its ownership and control.
- Determining whether a customer is acting on behalf of a beneficial owner and identifying the beneficial owner and taking all steps to verify the identity of the beneficial owner, using reliable and independent sources of identification.

d) "Customer identification" means undertaking the process of CDD.

e) "FATCA" means Foreign Account Tax Compliance Act of the United States of America (USA) which, inter alia, requires foreign financial institutions to report about financial accounts held by U.S. taxpayers or foreign entities in which U.S. taxpayers hold a substantial ownership interest.

f) "IGA" means Inter Governmental Agreement between the Governments of India and the USA to improve international tax compliance and to implement FATCA of the USA.

g) "KYC Templates" means templates prepared to facilitate collating and reporting the KYC data, to the CKYCR, for individuals and legal entities.

h) "Non-face-to-face customers" means customers who open accounts without visiting the branch/offices of SAMUNNATI or meeting the officials of SAMUNNATI.

i) "On-going Due Diligence" means regular monitoring of transactions in accounts to ensure that they are consistent with SAMUNNATI' s knowledge of the customers, customers' business and risk profile, and source of funds/wealth.

j) "Periodic Up-dation" means steps taken to ensure that documents, data, or information collected under the CDD process is kept up-to-date and relevant by undertaking reviews of

existing records at periodicity prescribed by the Reserve Bank.

k) Shell Bank" means a bank that has no physical presence in the country in which it is incorporated and licensed, and which is unaffiliated with a regulated financial group that is subject to effective consolidated supervision. Physical presence means meaningful mind and management located within a country. The existence simply of a local agent or low-level staff does not constitute a physical presence.

l) "Video based Customer Identification Process (V-CIP)": an alternate method of customer identification with facial recognition and Customer Due Diligence(CDD) by an authorized official of SAMUNNATI by undertaking seamless, secure, live, informed-consent based audio-visual interaction with the customer to obtain identification information required for CDD purpose, and to ascertain the veracity of the information furnished by the customer through independent verification and maintaining audit trail of the process. Such processes complying with prescribed standards and procedures shall be treated on par with face-to-face CIP for the purpose of this Master Direction.

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4. This policy shall include the following four key elements:

- Customer Acceptance Policy (CAP),
- Risk Management,
- Customer Identification Procedures (CIP); and
- Monitoring of Transactions

- This KYC policy shall incorporate provisions for:
  - Periodic updation of KYC
  - Any exceptional measures for KYC updation, such as requiring a recent photograph, physical presence, or a more frequent updation schedule than the minimum prescribed
  - Obtaining a copy of OVD or deemed OVD, for the purpose of proof of change of address during KYC updation
  - Providing facility of updation / periodic updation of KYC at any branch.
  - Change of registered Mobile Number for accounts opened in non-face-to-face mode.

5. In terms of PML Rules, groups are required to implement group-wide policies for the purpose of discharging obligations under the provisions of Chapter IV of the PML Act, 2002. (15 of 2003). Accordingly, every RE which is part of a group, shall implement group-wide programmes against money laundering and terror financing, including group-wide policies for sharing information required for the purposes of client due diligence and money laundering and terror finance risk management and such programmes shall include adequate safeguards on the confidentiality and use of information exchanged, including safeguards to prevent tipping-off

6.Money Laundering and Terrorist Financing Risk Assessment by SAMUNNATI:

(a) SAMUNNATI shall carry out 'Money Laundering (ML) and Terrorist Financing (TF) Risk Assessment' exercise periodically to identify, assess and take effective measures to mitigate its money laundering and terrorist financing risk for clients, countries or geographic areas, products, services, transactions, or delivery channels, etc.

(b) The assessment process shall consider all the relevant risk factors before determining the level of overall risk and the appropriate level and type of mitigation to be applied. While preparing the internal risk assessment, SAMUNNATI shall take cognizance of the overall sector-specific vulnerabilities, if any, that the regulator/supervisor may share with SAMUNNATI from time to time.

(c) The risk assessment by SAMUNNATI shall be properly documented and be proportionate to the nature, size, geographical presence, complexity of activities/structure, etc. of SAMUNNATI. Further, the periodicity of risk assessment exercise shall be determined by the Board of SAMUNNATI or any Committee of the Board to which power in this regard has been delegated, in alignment with the outcome of the risk assessment exercise. However, it should be reviewed at least annually.

(d) The outcome of the exercise shall be put up to the Board or any committee of the Board to which power in this regard has been delegated and shall be available to competent authorities and self- regulating bodies.

(e) SAMUNNATI shall apply a Risk Based Approach (RBA) for mitigation and management of the identified risk (identified on their own or through national risk assessment) and should have Board approved policies, controls, and procedures in this regard. SAMUNNATI shall implement a CDD program, having regard to the ML/TF risks identified and the size of the business. Further, SAMUNNATI shall monitor the implementation of the controls and enhance them if necessary.

7. Compliance of KYC policy

(a) SAMUNNATI shall ensure compliance with KYC Policy through:

1 Specifying as to who would constitute 'Senior Management' for the purpose of KYC compliance.
2 Allocation of responsibility for effective implementation of SAMUNNATI policies and procedures.
3 Independent evaluation of the compliance functions of SAMUNNATI' policies and procedures, including legal and regulatory requirements.
4 Concurrent/internal audit systems to verify the compliance with KYC/AML/Sanction policies and procedures.

5 Submission of quarterly audit notes and compliance observations to the Audit Committee.

(b) SAMUNNATI shall ensure that decision-making functions with regards to determining compliance with KYC norms are not outsourced.

8. Cusomer Acceptance Policy

SAMUNNATI shall ensure that:

a. No account is opened in anonymous or fictitious/benami name.

b. No account is opened where SAMUNNATI is unable to apply appropriate CDD measures, either due to non-cooperation of the customer or non-reliability of the documents/information furnished by the customer. SAMUNNATI shall consider filing a Suspicious Transaction Report (STR), if necessary, when it is unable to comply with the relevant CDD measures.

c. No transaction or account-based relationship is undertaken without following the CDD procedure.

d. The mandatory information to be sought for KYC purpose while opening an account and during the periodic up-dation, is specified.

e. Additional information, where such an information requirement has not been specified in the internal KYC Policy of SAMUNNATI, is obtained with the explicit consent of the customer after the account is opened.

f. SAMUNNATI shall apply the CDD procedure at the UCIC (Unique Customer Identification Code) level. Thus, if an existing KYC compliant customer of SAMUNNATI desires to open another account, or avail any other product or service from SAMUNNATI, there shall not be a requirement to undertake a fresh CDD exercise as far as identification of the customer is concerned.

g. CDD Procedure is followed for all the joint account holders, while opening a joint account.

h. Circumstances in which a customer is permitted to act on behalf of another person/entity, is clearly spelt out.

i. Suitable systems are put in place to ensure that the identity of the customer do not match with any person/s or entity/ies, whose name appears in the sanctions lists circulated by Reserve Bank of India indicated in para 18 to 21 of this policy.

j. Where Permanent Account Number (PAN) is obtained, the same shall be verified from the verification facility of the issuing authority.

k. Where an equivalent e-document is obtained from the customer, SAMUNNATI shall verify the digital signature as per the provisions of the Information Technology Act, 2000 (21 of 2000).

l. Where Goods and Services Tax (GST) details are available, the GST number shall be verified from the

search/verification facility of the issuing authority. Customer Acceptance Policy shall not result in denial of financial facility to members of the general public, especially those, who are financially or socially disadvantaged, including the Persons with Disabilities (PwDs). No application for onboarding or periodic updation of KYC shall be rejected without application of mind. Reason(s) of rejection shall be duly recorded by the officer concerned

j. Where SAMUNNATI forms a suspicion of money laundering or terrorist financing, and it reasonably believes that performing the CDD process will tip-off the customer, it shall not pursue the CDD process, and instead file an STR with FIU-IND.

9. Risk Management –

For Risk Management, SAMUNNATI shall have a risk-based approach which includes the following:

a. Customers shall be categorized as low, medium, and high-risk category, based on the assessment and risk perception of SAMUNNATI.
b. Broad principles may be laid down by SAMUNNATI for risk-categorization of customers.

c. Risk categorization shall be undertaken based on parameters such as customer's identity, social/financial status, nature of business activity, and information about the clients' business and their location, geographical risk covering customers as well as transactions, type of products/services offered, delivery channel used for delivery of products/services, types of transaction undertaken – cash, cheque/monetary instruments, wire transfers, forex transactions, etc. While considering customer's identity, the ability to confirm identity documents through online or other services offered by issuing authorities may also be factored in.
d. The risk categorization of a customer and the specific reasons for such categorization shall be kept confidential and shall not be revealed to the customer to avoid tipping off the customer.

Provided that various other information collected from different categories of customers relating to the perceived risk is non-intrusive and the same is specified in the KYC policy.

Explanation: Financial Action Task Force (FATF) Public Statement, the reports and guidance notes on KYC/AML issued by the Indian Banks Association (IBA), and other agencies, etc., may also be used in risk assessment.

10. Customer Identification Procedure (CIP)

SAMUNNATI shall undertake identification of customers in the following cases:

a. Commencement of an account-based relationship with the customer.
b. When there is a doubt about the authenticity or adequacy of the customer identification data it has obtained.

c. Selling third party products as agents, selling their own products, payment of dues of credit cards/sale and reloading of prepaid/travel cards and any other product for more than rupees fifty thousand.

For the purpose of verifying the identity of customers at the time of commencement of an account-based relationship, SAMUNNATI, shall at their option rely on customer due diligence done by a third party, subject to the following conditions:

(a) Records or the information of the customer due diligence carried out by the third party is obtained within two days from the third party or from the Central KYC Records Registry.

(b) Adequate steps are taken by SAMUNNATI to satisfy themselves that copies of identification data and other relevant documentation relating to the Customer due diligence requirements shall be made available from the third party upon request without delay.

(c) The third party is regulated, supervised, or monitored for, and has measures in place for, compliance with customer due diligence and record-keeping requirements in line with the requirements and obligations under the PML Act.

(d) The third party shall not be based in a country or jurisdiction assessed as high risk.

(e) The ultimate responsibility for customer due diligence and undertaking enhanced due diligence measures, as applicable, will be with SAMUNNATI.

11. Customer Due Diligence (CDD) Procedure:

Nature of customer	List of applicable documents
Individual	The Company shall obtain the following from an individual while establishing an account-based relationship or while dealing with the individual who is a beneficial owner, authorized signatory or the power of attorney holder related to any legal entity: a) the Aadhaar number where, i. He/ she is desirous of receiving any benefit or subsidy under any scheme notified under section 7 of the Aadhaar (Targeted Delivery of Financial and Other subsidies, Benefits and Services) Act, 2016 (18 of 2016); or ii. He/ she decides to submit his/ her Aadhaar number voluntarily or b) proof of possession of Aadhaar number where offline verification can be carried out; or c) the proof of possession of Aadhaar number where offline verification cannot be carried out or any OVD or the equivalent e-document thereof containing the details of his identity and address; or d) the KYC Identifier with an explicit consent to download records from CKYCR; and e) the Permanent Account Number (PAN) or Form no.60; and f) such other documents as specified by the Company from time to time.

	Provided that: 1. where the customer submits his proof of possession of Aadhaar number as an OVD, he may submit it in such form as are issued by the UIDAI (Unique Identification Authority of India). 2. Where the OVD furnished by the customer does not have an updated address, the following documents shall be deemed to be OVDs for the limited purpose of proof of address: - i. utility bill which is not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill), ii. property or Municipal tax receipt. iii. pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings if they contain the address. iv. letter of allotment of accommodation from employer issued by State Govt. or Central Govt. Departments, statutory or regulatory bodies, public sector undertakings, scheduled commercial banks, financial institutions and listed companies and leave and license agreements with such employers allotting official accommodation. v. The customer shall submit OVD with the current address within a period of three months of submitting the documents specified at '(2)' above. vi. where the OVD presented by a foreign national does not contain the details of address, in such case the documents issued by the Government departments of foreign jurisdictions and letter issued by the Foreign Embassy or Mission in India shall be accepted as proof of address. Explanation: A document shall be deemed to be an OVD even if there is a change in the name subsequent to its issuance provided it is supported by a marriage certificate issued by the State Government or Gazette notification, indicating such a change of name.
Sole Proprietary firms	1) Customer due diligence of the individual proprietor shall be carried out as applicable specified for Individual.

	2) In addition to the above, any two of the following documents or the equivalent e-documents there of as a proof of business/ activity in the name of the proprietary firm shall also be obtained: a) Registration certificate including Udyam Registration Certificate (URC) issued by the Government. b) Certificate/license issued by the municipal authorities under Shop and Establishment Act. c) Sales and income tax returns. d) CST/VAT/ GST certificate (provisional/final). e) Certificate/registration document issued by Sales Tax/Service Tax/Professional Tax authorities. f) IEC (Importer Exporter Code) issued to the proprietary concern by the office of DGFT or License/certificate of practice issued in the name of the proprietary concern by any professional body incorporated under a statute. g) Complete Income Tax Return (not just the acknowledgement) in the name of the sole proprietor where the firm's income is reflected, duly authenticated/acknowledged by the Income Tax authorities. h) Utility bills such as electricity, water, landline telephone bills, etc. Explanation: In cases where SAMUNNATI is satisfied that it is not possible to furnish two such documents, SAMUNNATI may, at its discretion, accept only one of those documents as proof of business/activity after recording the appropriate reason for accepting one document. Provided SAMUNNATI shall undertake contact point verification and collect such other information and clarification as would be required to establish the existence of such firm, and shall confirm and satisfy itself that the business activity has been verified from the address of the proprietary concern
Company	Certified copies of each of the following documents or the equivalent e-documents thereof shall be obtained: a) Certificate of incorporation b) Memorandum and Articles of Association c) Permanent Account Number of the company

	d) A resolution from the Board of Directors and power of attorney granted to its managers, officers, or employees to transact on its behalf. e) Documents, as specified for Individual, relating to beneficial owner, the managers, officers or employees, as the case may be, holding an attorney to transact on the company's behalf. f) the names of the relevant persons holding senior management position; and g) the registered office and the principal place of its business if it is different.
Partnership Firm	Certified copies of each of the following documents or the equivalent e-documents thereof shall be obtained: a) Registration certificate b) Partnership deed c) Permanent Account Number of the partnership firm d) Documents, as specified for Individual, relating to beneficial owner, managers, officers, or employees, as the case may be, holding an attorney to transact on its behalf. e) the names of all the partners and f) address of the registered office, and the principal place of its business, if it is different.
Trust	Certified copies of each of the following documents or the equivalent e-documents thereof shall be obtained: a) Registration certificate b) Trust deed c) Permanent Account Number or Form No.60 of the trust d) Documents, as specified for Individual, relating to beneficial owner, managers, officers, or employees, as the case may be, holding an attorney to transact on its behalf. e) the names of the beneficiaries, trustees, settlor, protector, if any and authors of the trust f) the address of the registered office of the trust; and g) list of trustees and documents, as specified under Customer Due Diligence for individuals, for those discharging the role as trustee and authorized to transact on behalf of the trust.

Unincorporated Association or a Body of Individuals	Certified copies of each of the following documents or the equivalent e-documents thereof shall be obtained: a. Resolution of the managing body of such association or body of individuals b. Permanent Account Number or Form No. 60 of the unincorporated association or a body of individuals c. Power of attorney granted to transact on its behalf. d. Documents, as specified for Individual, relating to beneficial owner, managers, officers, or employees, as the case may be, holding an attorney to transact on its behalf and e. Such information as may be required by the Company to collectively establish the legal existence of such an association or body of individuals. Explanation: I. Unregistered trusts/partnership firms shall be included under the term 'unincorporated association'. II. Term 'body of individuals includes societies.
a juridical person (not specifically covered in the earlier part) such as societies, universities, and local bodies like village panchayats, etc., or who purports to act on behalf of such juridical person or individual or trust	Certified copies of the or the equivalent e-document of the following documents shall be obtained: a) Document showing the name of the person authorized to act on behalf of the entity. b) Documents, as specified for Individual, of the person holding an attorney to transact on its behalf and c) Such documents may be required by the Company to establish the legal existence of such an entity/juridical person.

Provided that where the customer has submitted,

i) Aadhaar number under clause (b) above to SAMUNNATI notified under first proviso to sub-section (1) of section 11A of the PML Act, SAMUNNATI shall carry out authentication of the customer's Aadhaar number using e-KYC authentication facility provided by the Unique Identification Authority of India. Further, in such a case, if a customer wants to provide a current address, different from the address as per the identity information available in the Central Identities Data Repository, he may give a self-declaration to that effect to SAMUNNATI.

ii) proof of possession of Aadhaar under clause (c) above where offline verification can be carried out, SAMUNNATI shall carry out offline verification.

iii) An equivalent e-document of any OVD, SAMUNNATI shall verify the digital signature as per the provisions of the Information Technology Act, 2000 (21 of 2000) and any rules issues thereunder and take

a live photo as specified under Annex V.

iv) any OVD or proof of possession of Aadhaar number under clause (d) above where offline verification cannot be carried out, SAMUNNATI shall carry out verification through digital KYC as specified under Annex IV.

v) KYC Identifier under clause (d) above as part of document to be submitted by Individuals, SAMUNNATI shall retrieve the KYC records online from the CKYCR in accordance with paragraph 56

Provided that for a period not beyond such date as may be notified by the Government, instead of carrying out digital KYC, SAMUNNATI may obtain a certified copy of the proof of possession of Aadhaar number or the OVD and a recent photograph where an equivalent e-document is not submitted.

Provided further that in case e-KYC authentication cannot be performed for an individual desirous of receiving any benefit or subsidy under any scheme notified under section 7 of the Aadhaar (Targeted Delivery of Financial and Other subsidies, Benefits and Services) Act, 2016 owing to injury, illness or infirmity on account of old age or otherwise, and similar causes, SAMUNNATI shall, apart from obtaining the Aadhaar number, perform identification preferably by carrying out offline verification or alternatively by obtaining the certified copy of any other OVD or the equivalent e-document thereof from the customer. CDD done in this manner shall invariably be carried out by an official of SAMUNNATI and such exception handling shall also be a part of the concurrent audit as mandated in paragraph 8. SAMUNNATI shall ensure to duly record the cases of exception handling in a centralized exception database. The database shall contain the details of grounds of granting exception, customer details, name of the designated official authorizing the exception and additional details, if any. The database shall be subjected to periodic internal audit/inspection by SAMUNNATI and shall be available for supervisory review.

Explanation 1: SAMUNNATI shall, where its customer submits a proof of possession of Aadhaar Number containing Aadhaar Number, ensure that such customer redacts or blacks out his Aadhaar number through appropriate means where the authentication of Aadhaar number is not required as per proviso (i) above.

Explanation 2: Biometric based e-KYC authentication, including Aadhaar Face Authentication can be done by bank official/business correspondents/business facilitators.

Explanation 3: The use of Aadhaar, proof of possession of Aadhaar etc., shall be in accordance with the Aadhaar (Targeted Delivery of Financial and Other Subsidies Benefits and Services) Act, 2016 and the regulations made thereunder.

Accounts opened using Aadhar OTP-based e-KYC, in non-face-to-face mode, are subject to the following conditions:

i. There must be specific consent from the customer for authentication through OTP.

ii. As a risk-mitigating measure for such accounts, SAMUNNATI shall ensure that transaction alerts, OTP, etc., are sent only to the mobile number of the customer registered with Aadhaar. SAMUNNATI shall have a board approved policy delineating a robust process of due diligence for dealing with requests for change of mobile number in such accounts.

iii. As regards borrowal accounts, only term loans shall be sanctioned. The aggregate amount of term loans sanctioned shall not exceed rupees sixty thousand in a year.

iv. Borrowal accounts opened using OTP-based e-KYC shall not be allowed for more than one year within which identification as per para 9 is to be carried out.

v. If the CDD procedure as mentioned above is not completed within a year, in respect of borrowal accounts no further debits shall be allowed.

vi. A declaration shall be obtained from the customer to the effect that no other account has been opened nor will it be opened using OTP based KYC in non-face-to-face mode with any other Regulated Entity (RE). Further, while uploading KYC information to CKYCR, SAMUNNATI shall clearly indicate that such accounts are opened using OTP based e-KYC and other REs shall not open accounts based on the KYC information of accounts opened with OTP based e-KYC procedure in non-face-to-face mode.

vii. SAMUNNATI shall have strict monitoring procedures including systems to generate alerts in case of any non-compliance/violation, to ensure compliance with the above-mentioned conditions.

8B. SAMUNNATI may undertake live V-CIP as provided in Annexure V

12. Identification of Beneficial Owner

For opening an account of a Legal Person who is not a natural person, the beneficial owner(s) shall be identified and all reasonable steps in terms of Rule 9(3) of the Prevention of Money-laundering (Maintenance of Records) Rules, 2005 to verify his/her identity shall be undertaken keeping in view the following:

(a) Where the customer or the owner of the controlling interest is
(i) an entity listed on a stock exchange in India, or
(ii) it is an entity resident in jurisdictions notified by the Central Government and listed on stock exchanges in such jurisdictions, or
(iii) it is a subsidiary of such listed entities, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

(b) In cases of trust/nominee or fiduciary accounts whether the customer is acting on behalf of another person as trustee/nominee or any other intermediary is determined. In such cases, satisfactory evidence of the identity of the intermediaries and of the persons on whose behalf they are acting, as also details of the nature of the trust or other arrangements in place shall be obtained.

13. On-going Due Diligence

i. SAMUNNATI shall undertake on-going due diligence of customers to ensure that their transactions are consistent with their knowledge about the customers, customers' business and risk profile; and the source of funds/wealth.

ii. Without prejudice to the generality of factors that call for close monitoring, Transactions which exceed the thresholds prescribed for specific categories of accounts shall necessarily be monitored.

For ongoing due diligence, SAMUNNATI may consider adopting appropriate innovations including artificial intelligence and machine learning (AI & ML) technologies to support effective monitoring.

iii. The extent of monitoring shall be aligned with the risk category of the customer.

Explanation: High risk accounts have to be subjected to more intensified monitoring.
A system of periodic review of risk categorization of accounts, with such periodicity being at least once in six months for High Risk, and the need for applying enhanced due diligence measures shall be put in place.

Explanation: small deposits (generally in cash) across the country in one Loan account, shall be immediately reported to Reserve Bank of India and other appropriate authorities such as FIU-IND.

14. Up-dation/ Periodic Up-dation of KYC

SAMUNNATI shall adopt a risk-based approach for periodic up-dation of KYC ensuring that the information or data collected under CDD is kept up-to-date and relevant particularly where there is high risk. However, Periodic Up-dation of KYC shall be carried out at least once in every two years for high-risk customers, once in every eight years for medium risk customers and once in every ten years for low-risk customers from the date of opening the account/last KYC up-dation (indicative list of High Risk and Medium Risk Custom given in Annex-II)

Notwithstanding the provisions given above, in respect of an individual customer who is categorized as low risk, SAMUNNATI shall allow all transactions and ensure the up-dation of KYC within one year of its falling

due for KYC or up to June 30, 2026, whichever is later. SAMUNNATI shall subject accounts of such customers to regular monitoring. This shall also be applicable to low-risk individual customers for whom periodic up-dation of KYC has already fallen due.

Type of Customer	Periodic Updation

Individual Customers	**a) No change in KYC information:** In case of no change in the KYC information, a self-declaration from the customer in this regard shall be obtained through customer's email-id registered with SAMUNNATI, customer's mobile number registered with SAMUNNATI, digital channels (mobile application of SAMUNNATI), letter etc. b) **Change in address:** In case of a change only in the address details of the customer, a self-declaration of the new address shall be obtained from the customer through customer's email-id registered with SAMUNNATI, customer's mobile number registered with SAMUNNATI, , digital channels (such as, mobile application of SAMUNNATI), letter etc., and the declared address shall be verified through positive confirmation within two months, by means such as address verification letter, contact point verification, deliverables etc.
	Further, SAMUNNATI, at their option, may obtain a copy of OVD or deemed OVD viz , means the passport, the driving licence, proof of possession of Aadhaar number, the Voter's Identity Card issued by the Election Commission of India, job card issued by NREGA duly signed by an officer of the State Government and letter issued by the National Population Register containing details of name and address or the equivalent e-documents thereof, viz electronic equivalent of a document, issued by the issuing authority of such document with its valid digital signature including documents issued to the digital locker account of the customer as per rule 9 of the Information Technology (Preservation and Retention of Information by Intermediaries Providing Digital Locker Facilities) Rules, 2016 for the purpose of proof of address, declared by the customer at the time of periodic up-dation. Such requirement, however, shall be clearly specified by SAMUNNATI in their internal KYC policy duly approved by the Board of Directors of SAMUNNATI or any committee of the Board to which power has been delegated. c) Aadhaar OTP based e-KYC in non-face to face mode may be used for periodic up-dation. To clarify, conditions stipulated for opening an account using Aadhar OTP based E-KYC are not applicable in case of up-dation / periodic up-dation of KYC through Aadhaar OTP based e-KYC in non-face to face mode.
	Declaration of current address, if the current address is different from the address in Aadhaar, shall not require positive confirmation in this case. SAMUNNATI shall ensure that the mobile number for Aadhaar authentication is same as the one available with them in the customer's profile, in order to prevent any fraud.

Customers other than individuals	**a) No change in KYC information:** In case of no change in the KYC information of the LE customer, a self-declaration in this regard shall be obtained from the LE customer through its email id registered with SAMUNNATI, ATMs, digital channels (such as online banking / internet banking, mobile application of SAMUNNATI), letter from an official authorized by the LE in this regard, board resolution etc. Further, SAMUNNATI shall ensure during this process that Beneficial Ownership (BO) information available with them is accurate and shall update the same, if required, to keep it as up to date as possible. b) **Change in KYC information:** In case of change in KYC information, SAMUNNATI shall undertake the KYC process equivalent to that applicable for on-boarding, a new LE customer.
Additional measures	In addition to the above, SAMUNNATI shall ensure that, The KYC documents of the customer as per the current CDD standards are available with them. This is applicable even if there is no change in customer information but the documents available with SAMUNNATI are not as per the current CDD standards. Further, in case the validity of the CDD documents available with SAMUNNATI has expired at the time of periodic up-dation of KYC, SAMUNNATI shall undertake the KYC process equivalent to that applicable for on- boarding a new customer. Customer's PAN details, if available with SAMUNNATI, is verified from the database of the issuing authority at the time of periodic up-dation of KYC. Acknowledgment is provided to the customer mentioning the date of receipt of the relevant document(s), including self-declaration from the customer, for carrying out Updation/periodic up-dation. Further, it shall be ensured that the information / documents obtained from the customers at the time of Updation/periodic up-dation of KYC are promptly updated in the records / database of SAMUNNATI and an intimation, mentioning the date of up-dation of KYC details, is provided to the customer. In order to ensure customer convenience, SAMUNNATI may consider making available the facility of Updation/periodic up-dation of KYC at any branch, in terms of their internal KYC policy duly approved by the Board of Directors of or any committee of the Board to which power has been delegated.

	SAMUNNATI shall adopt a risk-based approach with respect to periodic up-dation of KYC. SAMUNNATI shall be clearly specified in the internal KYC policy duly approved by the Board of Directors of SAMUNNATI or any committee of the Board to which power has been delegated. SAMUNNATI shall advise the customers that in order to comply with the PML Rules, in case of any update in the documents submitted by the customer at the time of establishment of business relationship / account-based relationship and thereafter, as necessary, customers shall submit to SAMUNNATI the update of such documents. This shall be done within 30 days of the update to the documents for the purpose of updating the records at SAMUNNATI end
Due Notices for Periodic Updation of KYC	SAMUNNATI shall intimate its customers, in advance, to update their KYC. Prior to the due date of periodic updation of KYC, SAMUNNATI shall give at least three advance intimations, including at least one intimation by letter, at appropriate intervals to its customers through available communication options/ channels for complying with the requirement of periodic updation of KYC. Subsequent to the due date, SAMUNNATI shall give at least three reminders, including at least one reminder by letter, at appropriate intervals, to such customers who have still not complied with the requirements, despite advance intimations. The letter of intimation/ reminder may, *inter alia*, contain easy to understand instructions for updating KYC, escalation mechanism for seeking help, if required, and the consequences, if any, of failure to update their KYC in time. Issue of such advance intimation/ reminder shall be duly recorded in the RE's system against each customer for audit trail.

In case of existing customers, SAMUNNATI shall obtain the Permanent Account Number or equivalent e-document thereof or Form No.60, by such date as may be notified by the Central Government, failing which SAMUNNATI shall temporarily cease operations in the account till the time the Permanent Account Number or equivalent e-documents thereof or Form No. 60 is submitted by the customer.

Provided that before temporarily ceasing operations for an account, SAMUNNATI shall give the customer an accessible notice and a reasonable opportunity to be heard. However, customers who are unable to provide Permanent Account Number or equivalent e-document thereof or Form No. 60 owing to injury, illness, or infirmity on account of old age or otherwise, and such like causes. Such accounts shall, however, be subject to enhanced monitoring.

Provided further that if a customer having an existing account-based relationship with SAMUNNATI gives in writing that he does not want to submit his Permanent Account Number or equivalent e-document thereof or Form No.60, SAMUNNATI shall close the account and all obligations due in relation to the account shall be appropriately settled after establishing the identity of the customer by obtaining the identification documents as applicable to the customer.

Explanation – For the purpose of this paragraph, "temporary ceasing of operations" in relation an account shall mean the temporary suspension of all transactions or activities in relation to that account by SAMUNNATI till such time the customer complies with the provisions of this paragraph. In case of asset accounts such as loan accounts, for the purpose of ceasing the operation in the account, only credits shall be allowed.

15. Enhanced Due Diligence Procedure

I. **Enhanced Due Diligence (EDD) for non-face-to-face customer onboarding (other than customer onboarding in terms of paragraph 17):**

Non-face-to-face onboarding facilitates SAMUNNATI to establish relationship with the customer without meeting the customer physically or through V-CIP. Such non-face-to-face modes for the purpose of this paragraph includes the use of digital channels such as CKYCR, Digi Locker, equivalent e-document, etc., and non-digital modes such as obtaining a copy of OVD certified by additional certifying authorities as allowed for NRIs and PIOs. The following EDD measures shall be undertaken by SAMUNNATI for non-face-to- face customer onboarding (other than customer onboarding in terms of paragraph 17):

a) In case SAMUNNATI has introduced the process of V-CIP, the same shall be provided as the first option to the customer for remote onboarding. It is reiterated that processes complying with prescribed standards and procedures for V-CIP shall be treated on par with face-to-face CIP for the purpose of this Master Direction.

b) In order to prevent frauds, alternate mobile numbers shall not be linked post CDD with such accounts for transaction OTP, transaction updates, etc. Transactions shall be permitted only from the mobile number used for account opening. SAMUNNATI shall have a Board approved policy delineating a robust process of due diligence for dealing with requests for change of registered mobile number.

c) Apart from obtaining the current address proof, SAMUNNATI shall verify the current address through positive confirmation before allowing operations in the account. Positive confirmation may be carried out by means such as address verification letter, contact point verification, deliverables, etc.

d) SAMUNNATI shall obtain PAN from the customer and the PAN shall be verified from the verification facility of the issuing authority.

e) Such customers shall be categorized as high-risk customers and accounts opened in non-face to face mode shall be subjected to enhanced monitoring until the identity of the customer is verified in face-to-face manner or through V-CIP.

II. Accounts of Politically Exposed Persons (PEPs)

SAMUNNATI shall have the option of establishing a relationship with PEPs (whether as a customer or beneficial owner) subject to the Approval of Designated Director (Refer Section 3.18) provided that apart from performing normal customer due diligence:

a. SAMUNNATI has appropriate risk management systems to determine whether the customer or the Beneficial owner is PEP,
b. Reasonable measures are taken by SAMUNNATI for establishing source of funds/wealth.
c. Sufficient information including information about the sources of funds accounts of family members and close relatives is gathered on the PEP.
d. The identity of the person shall have been verified before accepting the PEP as a customer.
   The decision to open an account for a PEP is taken at a Senior Management level in accordance with SAMUNNATI's Customer Acceptance Policy.

   All such accounts are subjected to enhanced monitoring on an on-going basis.

e. in the event of an existing customer or the beneficial owner of an existing account subsequently becoming a PEP, senior management's approval is obtained to continue the business relationship.
f. CDD measures as applicable to PEPs including enhanced monitoring on an on-going basis are applicable.
   These instructions are also applicable to family members or close associates of PEPs
   Explanation: For the purpose of this paragraph, "Politically Exposed Persons" (PEPs) are individuals who are or have been entrusted with prominent public functions **by a foreign country**, including the Heads of States/Governments, senior politicians, senior government or judicial or military officers, senior executives of state-owned corporations and important political party officials.

16. Simplified Due Diligence:

I. Simplified norms for Self Help Groups (SHGs)

a. CDD Procedure of all the office bearers shall be done.
b. CDD Procedure of all the members of SHG may be undertaken at the time of credit linking of SHGs.

17. Record Management

The following steps shall be taken regarding maintenance, preservation and reporting of customer information, with reference to the provisions of the PML Act and Rules. SAMUNNATI shall,

(1) maintain all necessary records of transactions between SAMUNNATI and the customer, both domestic and international, for at least five years from the date of transaction.

(2) preserve the records pertaining to the identification of the customers and their addresses obtained while opening the account and during the course of business relationship, for at least five years after the business relationship is ended.

(3) make available swiftly, the identification records and transaction data to the competent authorities upon request.

(4) maintain all necessary information in respect of transactions prescribed under PML Rule 3 as given above so as to permit reconstruction of individual transactions, including the following:

a. the nature of the transactions.
b. the amount of the transaction and the currency in which it was denominated.
c. the date on which the transaction was conducted; and
d. the parties to the transaction.

(5) evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

(6) maintain records of the identity and address of their customer, and records in respect of transactions referred to in Rule 3 in hard or soft format.

Explanation. – For the purpose of this paragraph, the expressions "records pertaining to the identification", “identification records”, etc., shall include updated records of the identification data, account files, business correspondence and results of any analysis undertaken.

(7) SAMUNNATI shall ensure that in the case of customers who are non-profit organizations, the details of such customers are registered on the DARPAN Portal of NITI Aayog. If the same are not registered, SAMUNNATI shall register the details on the DARPAN Portal. SAMUNNATI shall also maintain such registration records for a period of five years after the business relationship between the customer and SAMUNNATI has ended or the account has been closed, whichever is later.

18. **V-CIP Records and Data Management:**

1. The entire data and recordings of V-CIP shall be stored in a system / system located in India. SAMUNNATI shall ensure that the video recording is stored in a safe and secure manner and bears the date and time stamp that affords easy historical data search. The extant instructions on record management, as stipulated in this MD, shall also be applicable for V-CIP.
2. The activity log along with the credentials of the official performing the V-CIP shall be preserved.

19. Reporting Requirements to Financial Intelligence Unit – India

SAMUNNATI shall furnish to the Director, Financial Intelligence Unit-India (FIU-IND), information referred to in Rule 3 of the PML (Maintenance of Records) Rules, 2005 in terms of Rule 7 thereof.

Explanation: In terms of Third Amendment Rules notified September 22, 2015, regarding amendment to sub rule 3 and 4 of rule 7, Director, FIU-IND shall have powers to issue guidelines to SAMUNNATI for detecting transactions referred to in various clauses of sub-rule (1) of rule 3, to direct them about the form of furnishing information and to specify the procedure and the manner of furnishing information.

While furnishing information to the Director, FIU-IND, delay of each day in not reporting a transaction or delay of each day in rectifying a mis-represented transaction beyond the time limit as specified in the Rule shall be constituted as a separate violation. SAMUNNATI shall not put any restriction on operations in the accounts where an STR has been filed. SAMUNNATI shall keep the fact of furnishing of STR strictly confidential. It shall be ensured that there is no tipping off to the customer at any level. It shall not inhibit the sharing of information of any analysis of transactions and activities which appear unusual, if any such analysis has been done.

20. Obligations under the Unlawful Activities (Prevention) (UAPA) Act, 1967:

SAMUNNATI shall ensure that in terms of Section 51A of the Unlawful Activities (Prevention) (UAPA) Act, 1967 and amendments thereto, SAMUNNATI do not have any account in the name of individuals/entities appearing in the lists of individuals and entities, suspected of having terrorist links, which are approved by and periodically circulated by the United Nations Security Council (UNSC).

(a) The **"ISIL (Da'esh) &Al-Qaida Sanctions List"**, which includes names of individuals and entities associated with the Al-Qaida. The updated ISIL &Al-Qaida Sanctions List is available at https://scsanctions.un.org/ohz5jen-al-qaida.html

(b) The **"Taliban Sanctions List"**, established and maintained pursuant to Security Council resolution 1988 (2011), which includes names of individuals and entities associated with the Taliban is available at https://scsanctions.un.org/3ppp1en-taliban.htm

SAMUNNATI shall also ensure to refer to the lists as available in the Schedules to the Prevention and Suppression of Terrorism (Implementation of Security Council Resolutions) Order, 2007, as amended from time to time. The aforementioned lists, i.e., UNSC Sanctions Lists and lists as available in the Schedules to the Prevention and Suppression of Terrorism (Implementation of Security Council Resolutions) Order, 2007, as amended from time to time, shall be verified on daily basis and any modifications to the lists in terms of additions, deletions or other changes shall be taken into account by SAMUNNATI for meticulous compliance.

Details of accounts resembling any of the individuals/entities in the lists shall be reported to FIU-IND apart from advising Ministry of Home Affairs (MHA) as required under UAPA notification dated February 2, 2021

(Annexure I).

In addition to the above, other UNSCRs circulated by the Reserve Bank in respect of any other jurisdictions/ entities from time to time shall also be taken note of.

Freezing of Assets under Section 51A of Unlawful Activities (Prevention) Act, 1967

The procedure laid down in the UAPA Order dated February 2, 2021(Annex I) shall be strictly followed and meticulous compliance with the Order issued by the Government shall be ensured. The list of Nodal Officers for UAPA is available on the website of Ministry of Home Affairs.

21. Obligations under Weapons of Mass Destruction (WMD) and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005 (WMD Act, 2005):

(a) SAMUNNATI shall ensure meticulous compliance with the "Procedure for Implementation of Section 12A of the Weapons of Mass Destruction (WMD) and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005" laid down in terms of Section 12A of the WMD Act, 2005 vide Order dated September 1, 2023, by the Ministry of Finance, Government of India (Refer Annex VI of this Policy document).

(b) In accordance with paragraph 3 of the aforementioned Order, SAMUNNATI shall ensure not to carry out transactions in case the particulars of the individual / entity match the particulars in the designated list.

(c) Further, SAMUNNATI shall run a check, on the given parameters, at the time of establishing a relation with a customer and on a periodic basis to verify whether individuals and entities in the designated list are holding any funds, financial asset, etc., in the form of bank account, etc.

(d) In case of match in the above cases, SAMUNNATI shall immediately inform the transaction details with full particulars of the funds, financial assets or economic resources involved to the Central Nodal Officer (CNO), designated as the authority to exercise powers under Section 12A of the WMD Act, 2005. A copy of the communication shall be sent to State Nodal Officer, where the account / transaction is held and to the RBI. SAMUNNATI shall file an STR with FIU-IND covering all transactions in the accounts covered above, carried through or attempted.

It may be noted that in terms of Paragraph 1 of the Order, Director, FIU-India has been designated as the CNO.

(e) SAMUNNATI may refer to the designated list, as amended from time to time, available on the portal of FIU-India.

(f) In case there are reasons to believe beyond doubt that funds or assets held by a customer would fall under the purview of clause (a) or (b) of sub-section (2) of Section 12A of the WMD Act, 2005, SAMUNNATI shall prevent such individual/entity from conducting financial transactions, under intimation to the CNO by email, FAX and by post, without delay.

(g) In case an order to freeze assets under Section 12A is received by SAMUNNATI from the CNO, SAMUNNATI shall, without delay, take necessary action to comply with the Order.

(h) The process of unfreezing of funds, etc., shall be observed as per paragraph 7 of the Order. Accordingly, copy of application received from an individual/entity regarding unfreezing shall be forwarded by SAMUNNATI along with full details of the asset frozen, as given by the applicant, to the CNO by email, FAX and by post, within two working days.

SAMUNNATI shall verify every day, the 'UNSCR 1718 Sanctions List of Designated Individuals and Entities', as available at https://www.mea.gov.in/Implementation-of-UNSC-Sanctions-DPRK.htm, to take into account any modifications to the list in terms of additions, deletions or other changes and also ensure compliance with the 'Implementation of Security Council Resolution on Democratic People's Republic of Korea Order, 2017', as amended from time to time by the Central Government.

In addition to the above, SAMUNNATI shall take into account – (a) other UNSCRs and (b) lists in the first schedule and the fourth schedule of UAPA, 1967 and any amendments to the same for compliance with the Government orders on implementation of Section 51A of the UAPA and Section 12A of the WMD Act. SAMUNNATI shall undertake countermeasures when called upon to do so by any international or intergovernmental organization of which India is a member and accepted by the Central Government

22. Jurisdictions that do not or insufficiently apply the FATF Recommendations

(a) FATF Statements circulated by Reserve Bank of India from time to time, and publicly available information, for identifying countries, which do not or insufficiently apply the FATF Recommendations, shall be considered. SAMUNNATI shall apply enhanced due diligence measures, which are effective and proportionate to the risks, to business relationships and transactions with natural and legal persons (including financial institutions) from countries for which this is called for by the FATF. Risks arising from the deficiencies in the AML/CFT regime of the jurisdictions included in the FATF Statement shall be taken into account.

(b) Special attention shall be given to business relationships and transactions with persons (including legal persons and other financial institutions) from or in countries that do not or insufficiently apply the FATF Recommendations and jurisdictions included in FATF Statements.

Explanation: The processes referred to in (a) & (b) above do not preclude SAMUNNATI from having legitimate trade and business transactions with the countries and jurisdictions mentioned in the FATF statement.

The background and purpose of transactions with persons (including legal persons and other financial institutions) from jurisdictions included in FATF Statements and countries that do not or insufficiently apply the FATF Recommendations shall be examined, and written findings together with all documents shall be retained and shall be made available to Reserve Bank/other relevant authorities, on request.

23. Secrecy Obligations and Sharing of Information:

(a) SAMUNNATI shall maintain secrecy regarding the customer information which arises out of the contractual relationship between SAMUNNATI and customer.

(b) Information collected from customers for the purpose of opening of account shall be treated as confidential and details thereof shall not be divulged for the purpose of cross-selling, or for any other purpose without the express permission of the customer.

(c) While considering the requests for data/information from the Government and other agencies, SAMUNNATI shall satisfy themselves that the information being sought is not of such a nature as will violate the provisions of the laws relating to secrecy in the related transactions.

(d) The exceptions to the said rule shall be as under:

i) Where disclosure is under compulsion of law
ii) Where there is a duty to the public to disclose,
iii) the interest of SAMUNNATI requires disclosure and
iv) Where the disclosure is made with the express or implied consent of the customer.

(e) SAMUNNATI shall maintain confidentiality of information as provided in Section 45NB of RBI Act 1934.

24. CDD Procedure and sharing KYC information with Central KYC Records Registry (CKYCR)

(a) Government of India has authorized the Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI), to act as, and to perform the functions of the CKYCR vide Gazette Notification No. S.O. 3183(E) dated November 26, 2015.

(b) In terms of provision of Rule 9(1A) of PML Rules, SAMUNNATI shall capture customer's KYC records and upload KYC data pertaining to

i all new individual accounts opened on or after from April 1, 2017
ii LEs opened on or after April 1, 2021,

onto CKYCR within 10 days of commencement of an account-based relationship with the customer.

(C) SAMUNNATI shall capture the KYC information for sharing with the CKYCR in the manner mentioned in the Rules, as per the KYC templates prepared for 'Individuals' and 'Legal Entities' (LEs), as the case may be. The templates may be revised from time to time, as may be required and released by CERSAI.

(d) Once KYC Identifier is generated by CKYCR, SAMUNNATI shall ensure that the same is communicated to the individual/LE as the case may be.

(e) In order to ensure that all KYC records are incrementally uploaded on to CKYCR, SAMUNNATI shall upload/update the KYC data pertaining to accounts of individual customers and LEs opened prior to the above-mentioned dates as per clauses (e) and (f) respectively at the time of periodic up-dation as specified in Section 38 of this Master Direction, or earlier, when the updated KYC information is obtained/received from the customer. Also, whenever SAMUNNATI obtains additional or updated information from any customer as per clause (j) below in this paragraph or Rule 9 (1C) of the PML Rules, SAMUNNATI shall within seven days or within such period as may be notified by the Central Government, furnish the updated information to CKYCR, which shall update the KYC records of the existing customer in CKYCR. CKYCR shall thereafter inform electronically all the reporting entities who have dealt with the concerned customer regarding the updation of KYC record of the said customer. Once CKYCR informs SAMUNNATI regarding an update in the KYC record of an existing customer, SAMUNNATI shall retrieve the updated KYC records from CKYCR and update the KYC record maintained with them

(f) SAMUNNATI shall ensure that during periodic up-dation, the customers are migrated to the current CDD standard.

(g) Where a customer, for the purposes of establishing an account-based relationship, updation/ periodic updation or for verification of identity of a customer, submits a KYC Identifier to SAMUNNATI, with an explicit consent to download records from CKYCR, then SAMUNNATI shall retrieve the KYC records online from the CKYCR using the KYC Identifier and the customer shall not be required to submit the same KYC records or information or any other additional identification documents or details, unless –

i. There is a change in the information of the customer as existing in the records of CKYCR or
ii. the KYC record or information retrieved is incomplete or is not as per the current applicable KYC norms; or
iii. the validity period of downloaded documents has lapsed; or
iv. SAMUNNATI considers it necessary in order to verify the identity or address(including current address) of the customer, or to perform enhanced due diligence or to build an appropriate risk profile of the client.

25. Reporting requirements under Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standards (CRS)

As SAMUNNATI is a non-deposit taking NBFC engaged in lending activities only for Indian Resident Customers, FATCA / CRS rules will not be applicable.

26. Introduction of New Technologies:

SAMUNNATI shall identify and assess the ML/TF risks that may arise in relation to the development of new products and new business practices, including new delivery mechanisms, and the use of new or developing technologies for both new and pre-existing products.

Further, SAMUNNATI shall ensure:

(a) to undertake the ML/TF risk assessments prior to the launch or use of such products, practices, services, technologies; and

(b) adoption of a risk-based approach to manage and mitigate the risks through appropriate EDD measures and transaction monitoring, etc.

27. Issuance of Prepaid Payment Instruments (PPIs):

PPI issuers shall ensure that the instructions issued by Department of Payment and Settlement System of Reserve Bank of India through their Master Direction are strictly adhered to.

28. Hiring of Employees and Employee training

a. Adequate screening mechanisms, including Know Your Employee / Staff policy, as an integral part of their personnel recruitment/hiring process shall be put in place.

b. SAMUNNATI shall endeavor to ensure that the staff dealing with / being deployed for KYC/AML/CFT matters have high integrity and ethical standards, good understanding of extant KYC/AML/CFT standards, effective communication skills and ability to keep up with the changing KYC/AML/CFT landscape, nationally and internationally. SAMUNNATI shall also strive to develop an environment which fosters open communication and high integrity amongst the staff.

c. On-going employee training program shall be put in place so that the members of staff are adequately trained in KYC/CFT policy. The focus of the training shall be different for frontline staff, compliance staff and staff dealing with new customers. The front desk staff shall be specially trained to handle issues arising from lack of customer education. Proper staffing of the audit function with persons adequately trained and well-versed in KYC/CFT policies of

SAMUNNATI, regulation and related issues shall be ensured.

d. Currently, the new employees are provided with KYC-AML training as a part of their induction. Apart from this, annual refresher training on the aspects of KYC-AML-Sanctions, shall be administered to all the employees

Annex-I

File No.14014/01/2019/CFT

Government of India

Ministry of Home Affairs

CTCR Division

North Block, New Delhi,

Dated 02nd February,2021

ORDER

Subject: - Procedure for implementation of Section 51A of the Unlawful (Prevention) Act, 1967.

Section 51A of the Unlawful Activities (Prevention) Act, 1967 (UAPA) reads as under: -

"51A. For the prevention of, and for coping with terrorist activities, the Central Government shall have power to —

a. freeze, seize or attach funds and other financial assets or economic resources held by, on behalf of or at the direction of the individuals or entities listed in the Schedule to the Order, or any other person engaged in or suspected to be engaged in terrorism.
b. prohibit any individual or entity from making any funds, financial assets or economic resources or related services available for the benefit of the individuals or entities listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism.
c. prevent the entry into or the transit through India of individuals listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism".

The Unlawful Activities (Prevention) Act, 1967 defines "Order" as under: -

"Order" means the Prevention and Suppression of Terrorism (Implementation of Security Council Resolutions) Order, 2007, as may be amended from time to time.

2. In order to ensure expeditious and effective implementation of the provisions of Section 51A, a revised procedure is outlined below in supersession of earlier orders and guidelines on the subject:

3. Appointment and communication details of the UAPA Nodal Officers:

3.1 The Joint Secretary (CTCR), Ministry of Home Affairs would be the Central [designated] Nodal Officer for the UAPA **[Telephone Number: 011-23093124, 011-230923465 (Fax), email address: jsctcr-mha@gov.in].**

3.2 The Ministry of External Affairs, Department of Economic Affairs, Ministry of Corporate Affairs, Foreigners Division of MHA, FIU-IND, Central Board of Indirect Taxes and Customs (CBIC) and Financial Regulators (RBI, SEBI and IRDA) shall appoint a UAPA Nodal Officer and communicate the name and contact details to the Central [designated] Nodal Officer for the UAPA.

3.3 All the States and UTs shall appoint a UAPA Nodal Officer preferably of the rank of the Principal Secretary/Secretary, Home Department and communicate the name and contact details to the Central [designated] Nodal Officer for the UAPA.

3.4 The Central [designated] Nodal Officer for the UAPA shall maintain the consolidated list of all UAPA Nodal Officers and forward the list to all other UAPA Nodal Officers, in July every year or as and when the list is updated and shall cause the amended list of UAPA Nodal Officers circulated to all the Nodal Officers.

3.5 The Financial Regulators shall forward the consolidated list of UAPA Nodal Officers to the banks, stock exchanges/depositories, intermediaries regulated by SEBI and insurance companies.

3.6 The Regulators of the real estate agents, dealers in precious metals & stones (DPMS) and DNFBPs shall forward the consolidated list of UAPA Nodal Officers to the real estate agents, dealers in precious metals & stones (DPMS) and DNFBPs.

4. Communication of the list of designated individuals/entities:

4.1 The Ministry of External Affairs shall update the list of individuals and entities subject to the UN sanction measures whenever changes are made in the lists by the UNSC 1267 Committee pertaining to Al Qaida and Da'esh and the UNSC 1988 Committee pertaining to Taliban. On such revisions, the Ministry of External Affairs would electronically forward the changes without delay to the designated Nodal Officers in the Ministry of Corporate Affairs, CBIC, Financial Regulators, FIU-IND, CTCR Division and Foreigners Division in MHA.

4.2 The Financial Regulators shall forward the list of designated persons as mentioned in Para 4(i) above, without delay to the banks, stock exchanges/ depositories, intermediaries regulated by SEBI and insurance companies.

4.3 The Central [designated] Nodal Officer for the UAPA shall forward the designated list as mentioned in Para 4(i) above, to all the UAPA Nodal Officers of States/UTs without delay.

4.4 The UAPA Nodal Officer in Foreigners Division of MHA shall forward the designated list as mentioned in Para 4(i) above, to the immigration authorities and security agencies without delay.

4.5 The Regulators of the real estate agents, dealers in precious metals & stones (DPMS) and DNFBPs, shall forward the list of designated persons as mentioned in Para 4(i) above, to the real estate agents, dealers in precious metals & stones (DPMS) and DNFBPs without delay.

5. Regarding funds, financial assets or economic resources or related services held in the form of bank accounts, stocks or Insurance policies etc.

5.1 The Financial Regulators will issue necessary guidelines to banks, stock exchanges/depositories, intermediaries regulated by the SEBI and insurance companies requiring them -

(i) To maintain updated designated lists in electronic form and run a check on the given parameters on a daily basis to verify whether individuals or entities listed in the Schedule to the Order, hereinafter, referred to as designated individuals/entities are holding any funds, financial assets or economic resources or related services held in the form of bank accounts, stocks, Insurance policies etc., with them.

(ii) In case, the particulars of any of their customers match with the particulars of designated individuals/entities, the banks, stock exchanges/depositories, intermediaries regulated by SEBI, insurance companies shall immediately inform full particulars of the funds, financial assets or economic resources or related services held in the form of bank accounts, stocks or Insurance policies etc., held by such customer on their books to the Central [designated] Nodal Officer for the UAPA, at Fax No.011-23092551, and also convey over telephone No. 011-23092548. The particulars apart from being sent by post shall necessarily be conveyed on email id: jsctcr-mha@gov.in.

(iii) The banks, stock exchanges/depositories, intermediaries regulated by SEBI and insurance companies shall also send a copy of the communication mentioned in 5.1 (ii) above to the UAPA Nodal Officer of the State/UT where the account is held and to Regulators and FIU-IND, as the case may be, without delay.

(iv) In case, the match of any of the customers with the particulars of designated individuals/entities is beyond doubt, the banks, stock exchanges/depositories, intermediaries regulated by SEBI and insurance companies shall prevent such designated persons from conducting financial transactions, under intimation to the Central [designated] Nodal Officer for the UAPA at Fax No.011-23092551 and also convey over telephone No.011-23092548. The particulars apart from being sent by post should necessarily be conveyed on e-mail id: jsctcr-mha@gov.in, without delay.

(v) The banks, stock exchanges/depositories, intermediaries regulated by SEBI, and insurance companies shall file a Suspicious Transaction Report (STR) with FIU-IND covering all transactions in the accounts, covered under Paragraph 5.1(ii) above, carried through or attempted as per the prescribed format.

5.2 On receipt of the particulars, as referred to in Paragraph 5 (i) above, the Central [designated] Nodal Officer for the UAPA would cause a verification to be conducted by the State Police and/or the Central Agencies so as to ensure that the individuals/ entities identified by the banks, stock exchanges/depositories, intermediaries and insurance companies are the ones listed as designated individuals/ entities and the funds, financial assets or economic resources or related services, reported

by banks, stock exchanges/depositories, intermediaries regulated by SEBI and insurance companies are held by the designated individuals/entities. This verification would be completed expeditiously from the date of receipt of such particulars.

5.3 In case, the results of the verification indicate that the properties are owned by or are held for the benefit of the designated individuals/entities, an order to freeze these assets under Section 51A of the UAPA would be issued by the Central [designated] nodal officer for the UAPA without delay and conveyed electronically to the concerned bank branch, depository and insurance company under intimation to respective Regulators and FIU-IND. The Central [designated] nodal officer for the UAPA shall also forward a copy thereof to all the Principal Secretaries/Secretaries, Home Department of the States/UTs and all UAPA nodal officers in the country, so that any individual or entity may be prohibited from making any funds, financial assets or economic resources or related services available for the benefit of the designated individuals/ entities or any other person engaged in or suspected to be engaged in terrorism. The Central [designated] Nodal Officer for the UAPA shall also forward a copy of the order to all Directors General of Police/ Commissioners of Police of all States/UTs for initiating action under the provisions of the Unlawful Activities (Prevention) Act, 1967.

The order shall be issued without prior notice to the designated individual/entity.

6. Regarding financial assets or economic resources of the nature of immovable properties:

6.1 The Central [designated] Nodal Officer for the UAPA shall electronically forward the designated list to the UAPA Nodal Officers of all States and UTs with request to have the names of the designated individuals/entities, on the given parameters, verified from the records of the office of the Registrar performing the work of registration of immovable properties in their respective jurisdiction, without delay.

6.2 In case, the designated individuals/entities are holding financial assets or economic resources of the nature of immovable property and if any match with the designated individuals/entities is found, the UAPA Nodal Officer of the State/UT would cause communication of the complete particulars of such individual/entity along with complete details of the financial assets or economic resources of the nature of immovable property to the Central [designated] Nodal Officer for the UAPA without delay at Fax No. 011-23092551 and also convey over telephone No. 011-23092548. The particulars apart from being sent by post would necessarily be conveyed on email id: jsctcr-mha@gov.in.

6.3 The UAPA Nodal Officer of the State/UT may cause such inquiry to be conducted by the State Police so as to ensure that the particulars sent by the Registrar performing the work of registering immovable properties are indeed of these designated individuals/entities. This verification shall be completed without delay and shall be conveyed within 24 hours of the verification, if it matches with the particulars

of the designated individual/entity to the Central [designated] Nodal Officer for the UAPA at the given Fax, telephone numbers and also on the email id.

6.4 The Central [designated] Nodal Officer for the UAPA may also have the verification conducted by the Central Agencies. This verification would be completed expeditiously.

6.5 In case, the result of the verification indicates that the particulars match with those of designated individuals/entities, an order under Section 51A of the UAPA shall be issued by the Central [designated] Nodal Officer for the UAPA without delay and conveyed to the concerned Registrar performing the work of registering immovable properties and to FIU-IND under intimation to the concerned UAPA Nodal Officer of the State/UT.

The order shall be issued without prior notice to the designated individual/entity.

6.6 Further, the UAPA Nodal Officer of the State/UT shall cause to monitor the transactions/ accounts of the designated individual/entity so as to prohibit any individual or entity from making any funds, financial assets or economic resources or related services available for the benefit of the individuals or entities listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism. The UAPA Nodal Officer of the State/UT shall, upon becoming aware of any transactions and attempts by third party immediately bring to the notice of the DGP/Commissioner of Police of the State/UT for initiating action under the provisions of the Unlawful Activities (Prevention) Act, 1967.

7. Regarding the real-estate agents, dealers of precious metals/stones (DPMS) and other Designated Non-Financial Businesses and Professions (DNFBPs) and any other person:

(i) The Designated Non-Financial Businesses and Professions (DNFBPs), inter alia, include casinos, real estate agents, dealers in precious metals/stones (DPMS), lawyers/notaries, accountants, company service providers and societies/ firms and non-profit organizations. The list of designated entities/individuals should be circulated to all DNFBPs by the concerned Regulators without delay.
(a) The DNFBPs are required to ensure that if any designated individual/entity approaches them for a transaction or relationship or attempts to undertake such transactions, the dealer should not carry out such transactions and, without delay, inform the UAPA Nodal officer of the State/UT with details of the funds/assets held and the details of the transaction, who in turn would follow the same procedure as in para 6.2 to 6.6 above. Further, if the dealers hold any assets or funds of the designated individual/entity, either directly or indirectly, they shall freeze the same without delay and inform the UAPA Nodal officer of the State/UT.

(ii) The CBIC shall advise the dealers of precious metals/stones (DPMS) that if any designated individual/entity approaches them for sale/purchase of precious metals/stones or attempts to undertake such transactions the dealer should not carry out such transaction and without delay inform the CBIC, who in turn follow the similar procedure as laid down in the paragraphs 6.2 to 6.5 above.

(iii) The UAPA Nodal Officer of the State/UT shall advise the Registrar of Societies/ Firms/ non-profit organizations that if any designated individual/ entity is a shareholder/ member/ partner/ director/settler/ trustee/ beneficiary/ beneficial owner of any society/ partnership firm/ trust/ non-profit organization, then the Registrar should inform the UAPA Nodal Officer of the State/UT without delay, who will, in turn, follow the procedure as laid down in the paragraphs 6.2 to 6.5 above. The Registrar should also be advised that no societies/ firms/ non-profit organizations should be allowed to be registered, if any of the designated individual/ entity is a director/ partner/ office bearer/ trustee/ settler/ beneficiary or beneficial owner of such juridical person and in case such request is received, then the Registrar shall inform the UAPA Nodal Officer of the concerned State/UT without delay, who will, in turn, follow the procedure laid down in the paragraphs 6.2 to 6.5 above.

(iv) The UAPA Nodal Officer of the State/UT shall also advise appropriate department of the State/UT, administering the operations relating to Casinos, to ensure that the designated individuals/ entities should not be allowed to own or have beneficial ownership in any Casino operation. Further, if any designated individual/ entity visits or participates in any game in the Casino and/ or if any assets of such designated individual/ entity is with the Casino operator, and of the particulars of any client matches with the particulars of designated individuals/ entities, the Casino owner shall inform the UAPA Nodal Officer of the State/UT without delay, who shall in turn follow the procedure laid down in paragraph 6.2 to 6.5 above.

(v) The Ministry of Corporate Affairs shall issue an appropriate order to the Institute of Chartered Accountants of India, Institute of Cost and Works Accountants of India and Institute of Company Secretaries of India (ICSI) requesting them to sensitize their respective members to the provisions of Section 51A of UAPA, so that if any designated individual/entity approaches them, for entering/ investing in the financial sector and/or immovable property, or they are holding or managing any assets/ resources of Designated individual/ entities, then the member shall convey the complete details of such designated individual/ entity to UAPA Nodal Officer in the Ministry of Corporate Affairs who shall in turn follow the similar procedure as laid down in paragraph 6.2 to 6.5 above.

(vi) The members of these institutes should also be sensitized that if they have arranged for or have been approached for incorporation/ formation/ registration of any company, limited liability firm, partnership

(vii) firm, society, trust, association where any of designated individual/ entity is a director/ shareholder/ member of a company/ society/ association or partner in a firm or settler/ trustee or beneficiary of a trust or a beneficial owner of a juridical person, then the member of the institute should not incorporate/ form/register such juridical person and should convey the complete details of such designated individual/ entity to UAPA Nodal Officer in the Ministry of Corporate Affairs who shall in turn follow the similar procedure as laid down in paragraph 6.2 to 6.5 above.

(viii) In addition, the member of the ICSI be sensitized that if he/she is Company Secretary or is holding any managerial position where any of designated individual/ entity is a Director and/or Shareholder or having beneficial ownership of any such juridical person then the member should convey the complete details of such designated individual/ entity to UAPA Nodal Officer in the Ministry of Corporate Affairs who shall in turn follow the similar procedure as laid down in paragraph 6.2 to 6.5 above.

(ix) The Registrar of Companies (ROC) may be advised that in case any designated individual/ entity is a shareholder/ director/ whole time director in any company registered with ROC or beneficial owner of such company, then the ROC should convey the complete details of such designated individual/ entity, as per the procedure mentioned in paragraph 8 to 10 above. This procedure shall also be followed in case of any designated individual/ entity being a partner of Limited Liabilities Partnership Firms registered with ROC or beneficial owner of such firms. Further the ROC may be advised that no company or limited liability Partnership firm shall be allowed to be registered if any of the designated individual/ entity is the Director/ Promoter/ Partner or beneficial owner of such company or firm and in case such a request received the ROC should inform the UAPA Nodal Officer in the Ministry of Corporate Affairs who in turn shall follow the similar procedure as laid down in paragraph 6.2 to 6.5 above.

(x) Any person, either directly or indirectly, holding any funds or other assets of designated individuals or entities, shall, without delay and without prior notice, cause to freeze any transaction in relation to such funds or assets, by immediately informing the nearest Police Station, which shall, in turn, inform the concerned UAPA Nodal Officer of the State/UT along with the details of the funds/assets held. The concerned UAPA Nodal Officer of the State/UT, would follow the same procedure as in para 6.2 to 6.6 above.

8. Regarding implementation of requests received from foreign countries under U.N. Security Council Resolution 1373 of 2001:

8.1 The U.N. Security Council Resolution No.1373 of 2001 obligates countries to freeze without delay the funds or other assets of persons who commit, or attempt to commit, terrorist acts or participate in or facilitate the commission of terrorist acts; of entities owned or controlled directly or indirectly by such persons; and of persons and entities acting on behalf of, or at the direction of such persons and entities, including funds or other assets derived or generated from property owned or controlled, directly or indirectly, by such persons and associated persons and entities. Each individual country has the authority to designate the persons and entities that should have their funds or other assets frozen. Additionally, to ensure that effective cooperation is developed among countries, countries should examine and give effect to, if appropriate, the actions initiated under the freezing mechanisms of other countries.

8.2 To give effect to the requests of foreign countries under the U.N. Security Council Resolution 1373, the Ministry of External Affairs shall examine the requests made by the foreign countries and forward it electronically, with their comments, to the Central [designated] Nodal Officer for the UAPA for freezing of funds or other assets.

8.3 The Central [designated] Nodal Officer for the UAPA shall cause the request to be examined without delay, so as to satisfy itself that on the basis of applicable legal principles, the requested designation is supported by reasonable grounds, or a reasonable basis, to suspect or believe that the proposed designee is a terrorist, one who finances terrorism or a terrorist organization, and upon his satisfaction, request would be electronically forwarded to the Nodal Officers in Regulators, FIU-IND and to the Nodal Officers of the States/UTs. The proposed designee, as mentioned above would be treated as designated individuals/entities.

9. Upon receipt of the requests by these Nodal Officers from the Central [designated] Nodal Officer for the UAPA, the similar procedure as enumerated at paragraphs 5 and 6 above shall be followed.

The freezing orders shall be issued without prior notice to the designated persons involved.

10. Regarding exemption, to be granted to the above orders in accordance with UNSCR 1452.

10.1 The above provisions shall not apply to funds and other financial assets or economic resources that have been determined by the Central [designated] nodal officer of the UAPA to be:-
(a) necessary for basic expenses, including payments for foodstuff, rent or mortgage, medicines and medical treatment, taxes, insurance premiums and public utility charges, or exclusively for payment of reasonable professional fees and reimbursement of incurred expenses associated with the provision of legal services or fees or service charges for routine holding or maintenance of frozen funds or other financial assets or economic resources, after notification by the MEA of the intention to authorize, where appropriate, access to such funds, assets or resources and in the absence of a negative decision within 48 hours of such notification;

(b) necessary for extraordinary expenses, provided that such determination has been notified by the MEA.

10.2. The addition may be allowed to accounts of the designated individuals/ entities subject to the provisions of paragraph 10 of:

(a) interest or other earnings due on those accounts, or

(b) payments due under contracts, agreements or obligations that arose prior to the date on which those accounts became subject to the provisions of resolutions 1267 (1999), 1333 (2000), or 1390 (2002),

Provided that any such interest, other earnings and payments continue to be subject to those provisions.

10.3 (a): The designated individual or organization may submit a request to the Central [Designated] Nodal Officer for UAPA under the provisions of Para 10.1 above. The Central [Designated] Nodal Officer for UAPA may be approached by post at "Additional Secretary (CTCR), North Block, New Delhi – 110001" or through email to jsctcr-mha@gov.in"

(b): The Central [Designated] Nodal Officer for UAPA shall examine such requests, in consultation with the Law Enforcement Agencies and other Security Agencies and Intelligence Agencies and, if accepted, communicate the same, if applicable, to the Ministry of External Affairs, Government of India for notifying the committee established pursuant to UNSC Resolution 1267 (1999) of the intention to authorize, access to such funds, assets or resources in terms of Para 10.1 above.

11. Regarding procedure for unfreezing of funds, financial assets or economic resources or related services of individuals/entities inadvertently affected by the freezing mechanism upon verification that the person or entity is not a designated person:

11.1 Any individual or entity, if it has evidence to prove that the freezing of funds, financial assets or economic resources or related services, owned/held by them has been inadvertently frozen, they shall move an application giving the requisite evidence, in writing, to the concerned bank, stock exchanges/ depositories, intermediaries regulated by SEBI, insurance companies, Registrar of Immovable Properties, ROC, Regulators of DNFBPs and the UAPA Nodal Officers of State/UT.

11.2 The banks, stock exchanges/depositories, intermediaries regulated by SEBI, insurance companies, Registrar of Immovable Properties, ROC, Regulators of DNFBPs and the State/ UT Nodal Officers shall inform and forward a copy of the application together with full details of the asset frozen given by any individual or entity informing of the funds, financial assets or economic resources or related services have been frozen inadvertently, to the Central [designated] Nodal Officer for the UAPA as per the contact details given in Paragraph 3.1 above, within two working days.

11.3 The Central [designated] Nodal Officer for the UAPA shall cause such verification, as may be required on the basis of the evidence furnished by the individual/entity, and, if satisfied, he/she shall pass an order, without delay, unfreezing the funds, financial assets or economic resources or related services, owned/held by such applicant, under intimation to the concerned bank, stock exchanges/depositories, intermediaries regulated by SEBI, insurance company, Registrar of Immovable Properties, ROC, Regulators of DNFBPs and the UAPA Nodal Officer of State/UT. However, if it is not possible for any reason to pass an Order unfreezing the assets within 5 working days, the Central [designated] Nodal Officer for the UAPA shall inform the applicant expeditiously.

11A. Regarding procedure for unfreezing of funds, financial assets or economic resources or related services of individuals/organisations in the event of delisting by the UNSCR 1267 (1999), 1988 (2011) and 1989 (2011) Committee

Upon making an application in writing by the concerned individual/organization, to the concerned bank, stock exchanges/depositories, intermediaries regulated by SEBI, insurance companies, Registrar of Immovable Properties, RoC, Regulators of DNFBPs, Department of Posts and the UAPA Nodal Officers of all States/UTs., who in turn shall forward the application along with the full details of the assets frozen to the Central [Designated] Nodal Officer for UAPA within two working days. The Central [Designated] Nodal Officer for UAPA shall examine the request in consultation with the Law Enforcement Agencies and other Security Agencies and Intelligence Agencies and cause such verification as may be required and if satisfied, shall pass an order, without delay, unfreezing the funds, financial assets or economic resources or related services owned or held by the applicant under intimation to concerned bank, stock exchanges/ depositories, intermediaries regulated by SEBI, insurance companies, Registrar of Immovable Properties, RoC, Regulators of DNFBPs, Department of Posts and the UAPA Nodal Officers of all States/UTs.

12. Regarding prevention of entry into or transit through India:

12.1 As regards prevention of entry into or transit through India of the designated individuals, the UAPA Nodal Officer in the Foreigners Division of MHA, shall forward the designated lists to the immigration authorities and security agencies with a request to prevent the entry into or the transit through India. The order shall take place without prior notice to the designated individuals/entities.

12.2 The immigration authorities shall ensure strict compliance of the order and also communicate the details of entry or transit through India of the designated individuals as prevented by them to the UAPA Nodal Officer in Foreigners Division of MHA.

13. Procedure for communication of compliance of action taken under Section 51A:

The Central [designated] Nodal Officer for the UAPA and the Nodal Officer in the Foreigners Division, MHA shall furnish the details of funds, financial assets or economic resources or related services of designated individuals/entities frozen by an order, and details of the individuals whose entry into India or transit through India was prevented, respectively, to the Ministry of External Affairs for onward communication to the United Nations.

14. Communication of the Order issued under Section 51A of Unlawful Activities (Prevention) Act, 1967:

The order issued under Section 51A of the Unlawful Activities (Prevention) Act, 1967 by the Central [designated] Nodal Officer for the UAPA relating to funds, financial assets or economic resources or related services, shall be communicated to all the UAPA nodal officers in the country, the Regulators of Financial Services, FIU-IND and DNFBPs, banks, depositories/stock exchanges, intermediaries regulated by SEBI, Registrars performing the work of registering immovable properties through the UAPA Nodal Officer

of the State/UT.

Annex-IIIndicative List	Characteristics
High Risk Customers	Individuals and entities listed in various United Nations Security Council Resolutions (UNSCRs) such as UN 1267 etc. 1. Individuals or entities listed in the schedule to the order under section 51A of the Unlawful Activities (Prevention) Act, 1967 relating to the purposes of prevention of, and for coping with terrorist activities. 2. Individuals or entities in watch lists issued by Interpol and other similar international organizations. 3. Customers with dubious reputation as per public information available or commercially available watch lists. 4. Individuals and entities specifically identified by regulators, FIU and other competent authorities as high risk. 5. Customers conducting their business relationship or transactions in unusual circumstances such as significant and unexplained geographic distance between the institution and the location of the customer, frequent and unexplained movement of accounts to different institutions, frequent and unexplained movement of funds between institutions in various geographic locations etc. 6. Customers based in high-risk countries / jurisdictions or locations. 7. Politically exposed persons (PEPs) of foreign origin, customers who are close relatives of PEPs and accounts of which a PEP is the ultimate beneficial owner. 8. Non-resident customers and foreign nationals. 9. Embassies/consulates 10. Off-shore (foreign) corporation/business 11. Non-face-to-face customers 12. High net worth individuals 13. Firms with “Sleeping partners” 14. Companies having close family shareholding or beneficial ownership. 15. Complex business ownership structures, which can make it easier to conceal underlying beneficiaries, where there is no legitimate commercial rationale. 16. Shell companies which have no physical presence in the country in which it is incorporated. The existence simply of a local agent or low-level staff does not constitute physical presence. 17. Investment Management/ Money Management Company/ Personal Investment Company 18. Accounts for “gatekeepers” such as accountants, lawyers, or other professionals for their clients where the identity of the underlying client is not disclosed to the financial institution. 19. Client Accounts managed by professional service providers such as law firms, accountants, agents, brokers, fund managers, trustees, custodians etc. 20. Trusts, charities, NGOs/Non- Profit Organizations (NPOs) (Especially those operating on a “cross-border” basis) unregulated clubs and organizations receiving donations (excluding NPOs/NGOs promoted by United Nations or its agencies) 21. Money Service Business: including seller of : Money Orders/ Travellers’ Checks/ Money Transmission/ Check Cashing/ Currency Dealing or Exchange 22. Business accepting third party cheques (except Supermarkets or retail stores that accept payroll cheques/ cash payroll cheques) 23. Gambling/ Gaming including “Junket Operators” arranging gambling tours.

	24. Dealers in high value or precious goods (e.g. Jewel, gem and precious metals dealers, art and antique dealers and auction houses, estate agents and real estate brokers) 25. Customers engaged in business which is associated with higher levels of corruption (e.g. arms manufacturers, dealers, and intermediaries.) 26. Customers engaged in industries that might relate to nuclear proliferation activities or explosives. 27. Customers that may appear to be Multi-level marketing companies etc.
Medium Risk	1. Non-Bank Financial Institution 2. Stock brokerage 3. Import/Export 4. Gas Station 5. Car/Boat/ Plane dealership 6. Electronics (wholesale) 7. Travel Agency 8. Used Car sales 9. Telemarketers 10. Providers of telecommunications service, internet café, IDD call service, phone cards, phone center 11. Dot-com company or internet business 12. Pawn shops 13. Auctioneers 14. Cash intensive business such as restaurants, retail shops, parking garages, fast food stores, movie theaters etc. 15. Sole Practitioners or Law Firms (small, little known) 16. Notaries (small, little known) 17. Secretarial Firms (small, little known) 18. Accountants (small, little known firms) 19. Venture Capital companies
Low Risk	Risk which is not categorized in High risk and Medium risk will be identified as low Risk
High/Medium risk Geographies	Indicative List of High/Medium risk Geographies Countries/Jurisdictions 1. Countries subject to sanctions, embargoes, or similar measures in the United Nations Security Council Resolutions (UNSCR) 2. Jurisdictions identified in FATF public statement as having substantial money laundering and terrorist financing (ML/TF) risks (www.fatf-gafi.org) 3. Jurisdictions identified in FATF public statement with strategic AML/CFT deficiencies (www.fatf-gafi.org) 4. Tax havens or countries that are known for highly secretive banking and corporate law practices 5. Counties identified by credible sources as lacking appropriate AML/CFT laws, regulations and other measures. 6. Countries identified by credible sources as providing funding or support for terrorist activities that have designated terrorist organizations operating within them 7. Countries identified by credible sources as having significant levels of criminal activity 8. Countries identified by the bank as high risk because of its prior experiences, transaction history or other factors (e.g. legal considerations, or allegations of official corruption)

Annex-III

Income-tax Rules, 1962

FORM NO. 60

[See second proviso to rule 114B]

Form for declaration to be filed by an individual or a person (not being a company or firm) who does not have a permanent account number and who enters into any transaction specified in rule 114B

1	First Name									
	Middle Nam									
	Surname									
2	Date of Birth/ Incorporation of declarant	D	D	M	M	Y	Y	Y	Y	
3	Father's Name (in case of individual)									
	First Name									
	Middle Name									
	Surname									

4	Flat/ Room No.	5	Floor No.
6	Name of premises	7	Block Name/No.
8	Road/ Street/ Lane	9	Area/ Locality

10	Town/ City	11	District	12	State

13	Pin code	14	Telephone Number (with STD code)	15	Mobile Number

16	Amount of transaction (Rs.)	

17	Date of transaction	D	D	M	M	Y	Y	Y	Y	
18	In case of transaction in joint names, number of persons involved in the transaction									
19	Mode of transaction: Cash, Cheque, Card, Draft/Banker's Cheque, Online transfer, Other									
20	Aadhaar Number issued by UIDAI (if available)									
21	If applied for PAN and it is not yet generated enter date of application and acknowledgement number	D	D	M	M	Y	Y	Y	Y	
22	If PAN not applied, fill estimated total income (including income of spouse, minor child etc. as per section 64 of Income-tax Act, 1961) for the financial year in which the above transaction is held									
	A Agricultural income (Rs.)									
	B Other than agricultural income (Rs.)									

23	Details of document being produced in support of identify in Column 1 *(Refer Instruction overleaf)*	Document code	Document identification number	Name and address of the authority issuing the document
24	Details of document being produced in support of address in Columns 4 to 13 *(Refer Instruction overleaf)*	Document code	Document identification number	Name and address of the authority issuing the document

Verification

I, _____ do hereby declare that what is stated above is true to the best of my knowledge and belief. I further declare that I do not have a Permanent Account Number and my/ our estimated total income (including income of spouse, minor child etc. as per section 64 of Income-tax Act, 1961) computed in accordance with the provisions of Income-tax Act, 1961 for the financial year in which the above transaction is held will be less than maximum amount not chargeable to tax. Verified today, the _____ day of _20_____

Place: _____ (Signature of declarant)

Note:

1. Before signing the declaration, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable,

(i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;

(ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

2. The person accepting the declaration shall not accept the declaration where the amount of income of the nature referred to in item 22b exceeds the maximum amount which is not chargeable to tax, unless PAN is applied for and column 21 is duly filled.

Instruction:

(1) Documents which can be produced in support of identity and address (not required if applied for PAN and item 20 is filled): -

Sl.	*Nature of Document*		*Document Code*	*Proof of Identity*	*Proof of Address*
A	**For Individuals and HUF**				
	1.	AADHAR card	**01**	Yes	Yes
	2.	Bank/Post office passbook bearing photograph of the person	**02**	Yes	Yes
	3.	Elector's photo identity card	**03**	Yes	Yes
	4.	Ration/Public Distribution System card bearing photograph of the person	**04**	Yes	Yes
	5.	Driving License	**05**	Yes	Yes
	6.	Passport	**06**	Yes	Yes
	7.	Pensioner Photo card	**07**	Yes	Yes
	8.	National Rural Employment Guarantee Scheme (NREGS) Job card	**08**	Yes	Yes
	9.	Caste or Domicile certificate bearing photo of the Person	**09**	Yes	Yes

10.	Certificate of identity/address signed by a Member of Parliament or Member of Legislative Assembly or Municipal Councillor or a Gazetted Officer as per annexure A prescribed in Form 49A	**10**	Yes	Yes
11.	Certificate from employer as per annexure B prescribed in Form 49A	**11**	Yes	Yes
12.	Kisan passbook bearing photo	**12**	Yes	No
13.	Arm's license	**13**	Yes	No
14.	Central Government Health Scheme /Ex-servicemen Contributory Health Scheme card	**14**	Yes	No
15.	Photo identity card issued by the government / Public Sector Undertaking	**15**	Yes	No
16.	Electricity bill *(Not more than 3 months old)*	**16**	No	Yes
17.	Landline Telephone bill *(Not more than 3 months old)*	**17**	No	Yes
18.	Water bill *(Not more than 3 months old)*	**18**	No	Yes
19.	Consumer gas card/book or piped gas bill *(Not more than 3 months old)*	**19**	No	Yes
20.	Bank Account Statement *(Not more than 3 months old)*	**20**	No	Yes
21.	Credit Card statement *(Not more than 3 months old)*	**21**	No	Yes
22.	Depository Account Statement *(Not more than 3 months old)*	**22**	No	Yes
23.	Property registration document	**23**	No	Yes
24.	Allotment letter of accommodation from Government	**24**	No	Yes
25.	Passport of spouse bearing name of the person	**25**	No	Yes
26.	Property tax payment receipt *(Not more than one year old)*	**26**	No	Yes

B	**For Association of persons (Trusts)**			
	Copy of trust deed or copy of certificate of registration issued by Charity Commissioner	**27**	Yes	Yes
C	**For Association of persons (other than Trusts) or Body of Individuals or Local authority or Artificial Juridical Person)**			
	Copy of Agreement or copy of certificate of registration issued by Charity commissioner or Registrar of Cooperative society or any other competent authority or any other document originating from any Central or State Government Department establishing identity and address of such person.	**28**	Yes	Yes

(2) In case of a transaction in the name of a Minor, any of the above-mentioned documents as proof of Identity and Address of any of parents/guardians of such minor shall be deemed to be the proof of identity and address for the minor declarant, and the declaration should be signed by the parent/guardian.

(3) For HUF any document in the name of Karta of HUF is required.

(4) In case the transaction is in the name of more than one person the total number of persons should be mentioned in Sl. No. 18 and the total amount of transaction is to be filled in Sl. No. 16.

In case the estimated total income in column 22b exceeds the maximum amount not chargeable to tax the person should apply for PAN, fill out item 21 and furnish proof of submission of application.

Annex-IV

Digital KYC Process

A. SAMUNNATI shall develop an application for digital KYC process which shall be made available at customer touch points for undertaking KYC of their customers and the KYC process shall be undertaken only through this authenticated application of SAMUNNATI.

B. The access of the Application shall be controlled by SAMUNNATI, and it should be ensured that the same is not used by unauthorized persons. The Application shall be accessed only through login-id and password, or Live OTP or Time OTP controlled mechanism given by SAMUNNATI to its authorized officials.

C. The customer, for the purpose of KYC, shall visit the location of the authorized official of SAMUNNATI or vice versa. The original OVD shall be in the possession of the customer.

D. SAMUNNATI must ensure that the Live photograph of the customer is taken by the authorized officer and the same photograph is embedded in the Customer Application Form (CAF). Further, the system Application of SAMUNNATI shall put a watermark in readable form having CAF number, GPS coordinates, authorized official's name, unique employee Code (assigned by SAMUNNATI) and Date (DD:MM: YYYY) and time stamp (HH:MM: SS) on the captured live photograph of the customer.

E. The Application of the SAMUNNATI shall have the feature that only live photograph of the customer is captured and no printed or video-graphed photograph of the customer is captured. The background behind the customer while capturing live photograph should be of white color and no other person shall come into the frame while capturing the live photograph of the customer.

F. Similarly, the live photograph of the original OVD or proof of possession of Aadhaar where offline verification cannot be carried out (placed horizontally), shall be captured vertically from above and water- marking in readable form as mentioned above shall be done. No skew or tilt in the mobile device shall be there while capturing the live photograph of the original documents.

G. The live photograph of the customer and his original documents shall be captured in proper light so that they are clearly readable and identifiable.

H. Thereafter, all the entries in the CAF shall be filled as per the documents and information furnished by the customer. In those documents where Quick Response (QR) code is available, such details can be auto populated by scanning the QR code instead of manual filing the details. For example, in case of physical Aadhaar/e-Aadhaar downloaded from UIDAI where QR code is available, the details like name, gender, date of birth and address can be auto-populated by scanning the QR available on Aadhaar/e-Aadhaar.

I. Once the above-mentioned process is completed, a One Time Password (OTP) message containing the text that 'Please verify the details filled in form before sharing OTP' shall be sent to customer's own mobile number. Upon successful validation of the OTP, it will be treated as customer signature on CAF. However, if the customer does not have his/her own mobile number, then mobile number of his/her family/relatives/known persons may be used for this purpose and be clearly mentioned in CAF. In any case, the mobile number of authorized officers registered with SAMUNNATI shall not be used for customer signature. SAMUNNATI must check that the mobile number used in customer signature shall not be the mobile number of the authorized officer.

J. The authorized officer shall provide a declaration about the capturing of the live photograph of customer and the original document. For this purpose, the authorized official shall be verified with One Time Password (OTP) which will be sent to his mobile number registered with SAMUNNATI. Upon successful OTP validation, it shall be treated as authorized officer's signature on the declaration. The live photograph of the authorized official shall also be captured in this authorized officer's declaration.

K. Subsequent to all these activities, the Application shall give information about the completion of the process and submission of activation request to activation officer of the SAMUNNATI, and also generate the transaction-id/reference-id number of the process. The authorized officer shall intimate the details regarding transaction-id/reference-id number to customer for future reference.

L. The authorized officer of SAMUNNATI shall check and verify that:- (i) information

available in the picture of document is matching with the information entered by authorized officer in CAF. (ii) livephotograph of the customer matches with the photo available in the document.; and (iii) all of the necessary details in CAF including mandatory field are filled properly.;

M. On Successful verification, the CAF shall be digitally signed by authorized officer of SAMUNNATI who will take a print of CAF, get signatures/thumb-impression of customer at appropriate place, then scan and upload the same in system. Original hard copy may be returned to the customer.

Annex-V
Video based Customer Identification Process (V-CIP)

SAMUNNATI may undertake V-CIP to carry out:

i. CDD in case of new customer on boarding for individual customers, proprietor in case of proprietorship firm, authorized signatories and Beneficial Owners (BOs) in case of Legal Entity (LE) customers.

ii. Provided that in case of CDD of a proprietorship firm, SAMUNNATI shall also obtain the equivalent e-document of the activity proofs with respect to the proprietorship firm, as mentioned in Section 28 and Section 29 of the Master Direction on Know Your Customer, apart from undertaking CDD of the proprietor.

iii. Conversion of existing accounts opened in non-face to face mode using Aadhaar OTP based e-KYC authentication as per Section 17.

iv. Up-dation/Periodic up-dation of KYC for eligible customers.

SAMUNNATI, opting to undertake V-CIP, shall adhere to the following minimum standards:

V-CIP Infrastructure

(i) The technology infrastructure should be housed in own premises of SAMUNNATI, and the V-CIP connection and interaction shall necessarily originate from its own secured network domain. Any technology related outsourcing for the process should be compliant with the relevant RBI guidelines. Where Cloud deployment model is used, it shall be ensured that the ownership of the data in such model rests with SAMUNNATI only and all data including video recording is transferred to SAMUNNATI's exclusively owned/leased servers including cloud server, if any, immediately after the V-CIP process is completed and no data shall be retained by the cloud service provider or third party technology provider assisting the V-CIP of SAMUNNATI

(ii) SAMUNNATI shall ensure end-to-end encryption of data between customer device and the hosting point of the V-CIP application, as per appropriate encryption standards. The customer consent shall be recorded in an auditable and alteration proof manner.

(iii) The V-CIP infrastructure / application shall be capable of preventing connection from IP addresses outside India or from spoofed IP addresses.

(iv) The video recordings should contain the live GPS co-ordinates (geo-tagging) of the customer undertaking the V-CIP and date-time stamp. The quality of the live video in the V-CIP shall be adequate to allow identification of the customer beyond doubt.

(v) The application shall have components with face liveness / spoof detection as well as face matching technology with high degree of accuracy, even though the ultimate responsibility of any customer identification rests with SAMUNNATI. Appropriate artificial intelligence (AI) technology can be used to ensure that the V-CIP is robust.

(vi) Based on experience of detected / attempted / 'near-miss' cases of forged identity, the technology infrastructure including application software as well as workflows shall be regularly upgraded.

Any detected case of forged identity through V-CIP shall be reported as a cyber event under extant regulatory guidelines.

(vii) The V-CIP infrastructure shall undergo necessary tests such as Vulnerability Assessment, Penetration testing and a Security Audit to ensure its robustness and end-to-end encryption capabilities.

Any critical gap reported under this process shall be mitigated before rolling out its implementation.

Such tests should be conducted by the empaneled auditors of Indian Computer Emergency Response Team (CERT-In) suitably accredited agencies as prescribed by RBI. Such tests should also be carried out periodically in conformance to internal / regulatory guidelines.

(viii) The V-CIP application software and relevant APIs / webservices shall also undergo appropriate testing of functional, performance, maintenance strength before being used in live environment. Only after closure of any critical gap found during such tests, the application should be rolled out. Such tests shall also be carried out periodically in conformity with internal/ regulatory guidelines.

V- CIP Procedure

i. SAMUNNATI shall formulate a clear workflow and standard operating procedure for V-CIP and ensure adherence to it. The V-CIP process shall be operated only

by officials of SAMUNNATI specially trained for this purpose. The official should be capable to carry out liveliness check and detect any other fraudulent manipulation or suspicious conduct of the customer and act upon it. The liveness check shall not result in exclusion of person with special needs.

ii. Disruption of any sort including pausing of video, reconnecting calls, etc., should not result in creation of multiple video files. If pause or disruption is not leading to the creation of multiple files, then there is no need to initiate a fresh session by SAMUNNATI. However, in case of call drop / disconnection, fresh session shall be initiated.

iii. If there is a disruption in the V-CIP procedure, the same shall be aborted and a fresh session initiated.

iv. The sequence and/or type of questions, including those indicating the liveness of the interaction, during video interactions shall be varied in order to establish that the interactions are real-time and not pre-recorded.

v. Any prompting, observed at end of customer shall lead to rejection of the account opening process.

vi. The fact of the V-CIP customer being an existing or new customer, or if it relates to a case rejected earlier or if the name appearing in some negative list should be factored in at appropriate stage of workflow.

vii. The authorised official of SAMUNNATI performing the V-CIP shall record audio video as well as capture photograph of the customer present for identification and obtain the identification information using any one of the following:

a) OTP based Aadhaar e-KYC authentication.

b) Offline Verification of Aadhaar for identification

c) KYC records downloaded from CKYCR, in accordance with Section 56, using the KYC identifier provided by the customer.

d) Equivalent e-document of Officially Valid Documents (OVDs) including documents issued through Digi locker.

SAMUNNATI shall ensure to redact or blackout the Aadhaar number in terms of Section 16.

In case of offline verification of Aadhaar using XML file or Aadhaar Secure QR Code, it shall be ensured that the XML file or QR code generation date is not older than three working days from the date of carrying out V-CIP.

Further, in line with the prescribed period of three working days for usage of Aadhaar XML file / Aadhaar QR code, SAMUNNATI shall ensure that the video process of the V-CIP is undertaken within three working days of downloading / obtaining the identification information through CKYCR / Aadhaar authentication / equivalent e-document, if in the rare cases, the entire process cannot be completed at one go or seamlessly. However, SAMUNNATI shall ensure that no incremental risk is added due to this.

viii. If the address of the customer is different from that indicated in the OVD, suitable records of the current address shall be captured, as per the existing requirement. It shall be ensured that the economic and financial profile/information submitted by the customer is also confirmed from the customer undertaking the V-CIP in a suitable manner.

ix. SAMUNNATI shall capture a clear image of PAN card to be displayed by the customer during the process, except in cases where e-PAN is provided by the customer. The PAN details shall be verified from the database of the issuing authority including through Digi locker.

x. Use of printed copy of equivalent e-document including e-PAN is not valid for the V-CIP.

xi. The authorized official of SAMUNNATI shall ensure that photograph of the customer in the Aadhaar/OVD and PAN/e-PAN matches with the customer undertaking the V-CIP and the identification details in Aadhaar/OVD and PAN/e-PAN shall match with the details provided by the customer.

xii. All accounts opened through V-CIP shall be made operational only after being subject to concurrent audit, to ensure the integrity of process and its acceptability of the outcome.

xiii. All matters not specified under the paragraph but required under other statutes such as the Information Technology (IT) Act shall be appropriately complied with by SAMUNNATI.

V-CIP Records and Data Management

i) The entire data and recordings of V-CIP shall be stored in a system / systems located in India. SAMUNNATI shall ensure that the video recording is stored in a safe and secure manner and bears the date and time stamp that affords easy historical data search. The extant instructions on record management, shall also be applicable for V-CIP.

ii) The activity log along with the credentials of the official performing the V-CIP shall be preserved.


Samunnati

Annex VI

F.No.P - 12011/14/2022-ES Cell-DOR

Government of India

Ministry of Finance

Department of Revenue

****

New Delhi, dated the 1st September, 2023.

ORDER

Subject: - Procedure for implementation of Section 12A of "The Weapons of Mass Destruction and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005".

Section 12A of The Weapons of Mass Destruction and their Delivery Systems (Prohibition of Unlawful Activities) Act, 2005 [hereinafter referred to as 'the Act'] reads as under: -

"12A. (1) No person shall finance any activity which is prohibited under this Act, or under the United Nations (Security Council) Act, 1947 or any other relevant Act for the time being in force, or by an order issued under any such Act, in relation to weapons of mass destruction and their delivery systems.

(2) For prevention of financing by any person of any activity which is prohibited under this Act, or under the United Nations (Security Council) Act, 1947 or any other relevant Act for the time being in force, or by an order issued under any such Act, in relation to weapons of mass destruction and their delivery systems, the Central Government shall have power to—

a) freeze, seize or attach funds or other financial assets or economic resources—

i. owned or controlled, wholly or jointly, directly or indirectly, by such person; or

ii. held by or on behalf of, or at the direction of, such person; or

iii. derived or generated from the funds or other assets owned or controlled, directly or indirectly, by such person.

prohibit any person from making funds, financial assets or economic resources or related services available for the benefit of persons related to any activity which is prohibited under this Act, or under the United Nations (Security Council) Act, 1947 or any other relevant Act for the time being in force, or by an order issued under any such Act, in relation to weapons of mass destruction and their delivery systems.

(3) The Central Government may exercise its powers under this section through any authority who has been assigned the power under sub-section (1) of section 7."

II In order to ensure expeditious and effective implementation of the provisions of Section 12A of the Act, the procedure is outlined below.

1. Appointment and communication details of Section 12A Nodal Officers:

1.1 In exercise of the powers conferred under Section 7(1) of the Act, the Central Government assigns Director, FIU-India, Department of Revenue, Ministry of Finance, as the authority to exercise powers under Section 12A of the Act. The Director, FIU-India shall be hereby referred to as the Central Nodal Officer (CNO) for the purpose of this order. **[Telephone Number: 011-23314458, 011-23314435, 011-23314459 (FAX), email address: dir@fiuindia.gov.in]**.

1.2 **Regulator** under this order shall have the same meaning as defined in Rule 2(fa) of Prevention of Money-Laundering (Maintenance of Records) Rules, 2005. **Reporting Entity (RE)** shall have the same meaning as defined in Section 2 (1) (wa) of Prevention of Money-Laundering Act, 2002. DNFPBs is as defined in section 2(1) (sa) of Prevention of Money-Laundering Act, 2002.

1.3 The Regulators, Ministry of Corporate Affairs and Foreigners Division of MHA shall notify a Nodal Officer for implementation of provisions of Section 12A of the Act. The Regulator may notify the Nodal Officer appointed for implementation of provisions of Section 51A of UAPA, also, as the Nodal Officer for implementation of Section 12A of the Act. All the States and UTs shall notify a State Nodal officer for implementation of Section 12A of the Act. A State/UT may notify the State Nodal Officer appointed for implementation of provisions of Section 51A of UAPA, also, as the Nodal Officer for implementation of Section 12A of the Act.

1.4 The CNO shall maintain an updated list of all Nodal Officers and share the updated list with all Nodal Officers periodically. The CNO shall forward the updated list of all Nodal Officers to all REs.

2. Communication of the lists of designated individuals/entities:

2.1 The Ministry of External Affairs will electronically communicate, without delay, the changes made in the list of designated individuals and entities (hereinafter referred to as 'designated list') in line with section 12A (1) to the CNO and Nodal officers.

2.1.1 Further, the CNO shall maintain the Designated list on the portal of FIU-India. The list would be updated by the CNO, as and when it is updated, as per para 2.1 above, without delay. It shall make available for all Nodal officers, the State Nodal Officers, and to the Registrars performing the work of registration of immovable properties, either directly or through State Nodal Officers, without delay.

2.1.2 The Ministry of External Affairs may also share other information relating to prohibition / prevention of financing of prohibited activity under Section 12A (after its initial assessment of the relevant factors in the case) with the CNO and other organizations concerned, for initiating verification and suitable action.

2.1.3 The Regulators shall make available the updated designated list, without delay, to their REs. The REs will maintain the designated list and update it, without delay, whenever changes are made as per para 2.1 above.

2.2 The Nodal Officer for Section 12A in Foreigners Division of MHA shall forward the updated designated list to the immigration authorities and security agencies, without delay.

3. Regarding funds, financial assets or economic resources or related services held in the form of bank accounts, stocks or insurance policies, etc.

3.1 All Financial Institutions shall –

i. Verify if the particulars of the entities/individual, party to the financial transactions, match with the particulars of designated list and in case of match, REs shall not carry out such transaction and shall immediately inform the transaction details with full particulars of the funds, financial assets or economic resources involved to the CNO by email, FAX and by post, without delay.

ii. Run a check, on the given parameters, at the time of establishing a relation with a customer and on a periodic basis to verify whether individuals and entities in the designated list are holding any funds, financial assets or economic resources or related services, in the form of bank accounts, stocks, Insurance policies etc. In case, the particulars of any of their customers match with the particulars of designated list, REs shall immediately inform full particulars of the funds, financial assets or economic resources or related services held in the form of bank accounts, stocks or insurance policies etc., held on their books to the CNO by email, FAX and by post, without delay.

iii. The REs shall also send a copy of the communication, mentioned in 3.1 (i) and (ii) above, to State Nodal Officer, where the account/transaction is held, and to their Regulator, as the case may be, without delay.

iv. In case there are reasons to believe beyond doubt that funds or assets held by a customer would fall under the purview of clause (a) or (b) of sub-section (2) of Section 12A, REs shall prevent such individual/entity from conducting financial transactions, under intimation to the CNO by email, FAX and by post, without delay.

3.2 On receipt of the particulars, as referred to in Paragraph 3.1 above, the CNO would cause a verification to be conducted by the State Police and/or the Central Agencies so as to ensure that the individuals/entities identified by the REs are the ones in designated list and the funds, financial assets or economic resources or related services, reported by REs are in respect of the designated individuals/entities. This verification would be completed expeditiously from the date of receipt of such particulars.

3.3 In case, the results of the verification indicate that the assets are owned by, or are held for the benefit of, the designated individuals/entities, an order to freeze these assets under Section 12A would be issued by the CNO without delay and be conveyed electronically to the concerned RE under intimation to respective Regulators. The CNO shall also forward a copy thereof to all the Principal Secretaries/Secretaries, Home Department of the States/UTs and All Nodal officers in the country, so that any individual or entity may be prohibited from making any funds, financial assets or economic resources or related services available for the benefit of the designated individuals / entities. The CNO shall also forward a copy of the order to all Directors General of Police/ Commissioners of Police of all States/UTs for initiating suitable action.

3.4 The order shall be issued without prior notice to the designated individual/entity.

4. Regarding financial assets or economic resources of the nature of immovable properties:

4.1 The Registrars performing work of registration of immovable properties shall --

i. Verify if the particulars of the entities/individual, party to the transactions, match with the particulars of the designated list, and, in case of match, shall not carry out such transaction and immediately inform the details with full particulars of the assets or economic resources involved to the State Nodal Officer, without delay.

ii. Verify from the records in their respective jurisdiction, without delay, on given parameters, if the details match with the details of the individuals and entities in the designated list. In case, the designated individuals/entities are holding financial assets or economic resources of the nature of immovable property, and if any match with the designated individuals/entities is found, the Registrar shall immediately inform the details with full particulars of the assets or economic resources involved to the State Nodal Officer, without delay.

iii. In case there are reasons to believe beyond doubt that assets that are held by an individual/entity would fall under the purview of clause (a) or (b) of sub-section (2) of Section 12A, Registrar shall prevent such individual/entity from conducting transactions, under intimation to the State Nodal Officer by email, FAX and by post , without delay.

4.2 the State Nodal Officer would cause communication of the complete particulars of such individual/entity along with complete details of the financial assets or economic resources to the CNO without delay by email, FAX and by post.

4.3 The State Nodal Officer may cause such inquiry to be conducted by the State Police so as to ensure that the particulars sent are indeed of these designated individuals/entities. This verification shall be completed without delay and shall be conveyed, within 24 hours of the verification, if it matches, with the particulars of the designated individual/entity, to the CNO without delay by email, FAX and by post.

4.4 The CNO may also have the verification conducted by the Central Agencies. This verification would be completed expeditiously.

4.5 In case, the results of the verification indicate that the assets are owned by, or are held for the benefit of, the designated individuals/entities, an order to freeze these assets under Section 12A would be issued by the CNO without delay and be conveyed electronically to the concerned Registrar performing the work of registering immovable properties, and to FIU under intimation to the concerned State Nodal Officer. The CNO shall also forward a copy thereof to all the Principal Secretaries/Secretaries, Home Department of the States/UTs and All Nodal officers in the country, so that any individual or entity may be prohibited from making any funds, financial assets or economic resources or related services available for the benefit of the designated individuals

/ entities. The CNO shall also forward a copy of the order to all Directors General of Police/ Commissioners of Police of all States/UTs for initiating suitable action.

4.6 The order shall be issued without prior notice to the designated individual/entity.

5. Regarding the real-estate agents, dealers of precious metals/stones (DPMS), Registrar of Societies/ Firms/ non-profit organizations, The Ministry of Corporate Affairs and Designated Non-Financial Businesses and Professions (DNFBPs):

(i) The dealers of precious metals/stones (DPMS) as notified under PML (Maintenance of Records) Rules, 2005 and Real Estate Agents, as notified under clause (vi) of Section 2(1) (sa) of Prevention of Money-Laundering Act, 2002, are required to ensure that if any designated individual/entity approaches them for sale/purchase of precious metals/stones/Real Estate Assets or attempts to undertake such transactions, the dealer should not carry out such transaction and, without delay, inform the Section 12A Nodal officer in the Central Board of Indirect Taxes and Customs (CBIC). Also, If the dealers hold any assets or funds of the designated individual/entity, they shall freeze the same without delay and inform the Section 12A Nodal officer in the CBIC, who will, in turn, follow procedure similar to as laid down for State Nodal Officer in the paragraphs 4.2 to 4.6.

(ii) Registrar of Societies/ Firms/ non-profit organizations are required to ensure that if any designated individual/ entity is a shareholder/ member/ partner/ director/ settler/ trustee/ beneficiary/ beneficial owner of any society/ partnership firm/ trust/ non-profit organization, then the Registrar shall freeze any transaction for such designated individual/ entity and shall inform the State Nodal Officer, without delay, and, if such society/ partnership firm/ trust/ non-profit organization holds funds or assets of designated individual/ entity, follow the procedure as laid down for State Nodal Officer in the paragraphs 4.2 to 4.6 above. The Registrar should also ensure that no societies/ firms/ non-profit organizations should be allowed to be registered if any of the designated individual/ entity is a director/ partner/ office bearer/ trustee/ settler/ beneficiary or beneficial owner of such juridical person and, in case, such request is received, then the Registrar shall inform the State Nodal Officer, without delay.

(iii) The State Nodal Officer shall also advise appropriate department of the State/UT, administering the operations relating to Casinos, to ensure that the designated individuals/ entities should not be allowed to own or have beneficial ownership in any Casino operation. Further, if any designated individual/ entity visits or participates in any game in the Casino or if any assets of such designated individual/ entity are with the Casino operator, or if the particulars of any client match with the particulars of designated individuals/ entities, the Casino owner shall inform the State Nodal Officer, without delay, and shall freeze any such transaction.

(iv) The Ministry of Corporate Affairs shall issue an appropriate order to the Institute of Chartered Accountants of India, Institute of Cost and Works Accountants of India and Institute of Company Secretaries of India (ICSI), requesting them to sensitize their respective members to the provisions of Section 12A, so that, if any designated individual/entity approaches them, for entering/ investing in the financial sector and/or immovable

property, or they are holding or managing any assets/ resources of designated individual/ entities, then the member shall convey the complete details of such designated individual/ entity to Section 12A Nodal Officer in the Ministry of Corporate Affairs, who shall in turn follow the similar procedure as laid down for State Nodal Officer in paragraph 4.2 to 4.6 above.

(v) The members of these institutes should also be sensitized by the Institute of Chartered Accountants of India, Institute of Cost and Work Accountants of India and Institute of Company Secretaries of India (ICSI) that if they have arranged for or have been approached for incorporation/ formation/ registration of any company, limited liability firm, partnership firm, society, trust, association where any designated individual/ entity is a director/ shareholder/ member of a company/ society/ association or partner in a firm or settler/ trustee or beneficiary of a trust or a beneficial owner of a juridical person, then the member of the institute should not incorporate/ form/ register such juridical person and should convey the complete details of such designated individual/ entity to Section 12A Nodal Officer in the Ministry of Corporate Affairs.

(vi) In addition, a member of the ICSI shall, if he/she is Company Secretary or is holding any managerial position where any of designated individual/ entity is a Director and/or Shareholder or having beneficial ownership of any such juridical person, convey the complete details of such designated individual/ entity to Section 12A Nodal Officer in the Ministry of Corporate Affairs, who shall follow the similar procedure as laid down in paragraph 4.2 to 4.6 above for State Nodal Officer, if such company, limited liability firm, partnership firm, society, trust, or association holds funds or assets of the designated individual/entity.

(vii) In case any designated individual/ entity is a shareholder/ director/ whole time director in any company registered with the Registrar of Companies (ROC) or beneficial owner of such company or partner in a Limited Liabilities Partnership Firm registered with ROC or beneficial owner of such firm, the ROC should convey the complete details of such designated individual/ entity to section 12A Nodal officer of Ministry of Corporate Affairs. If such company or LLP holds funds or assets of the designated individual/ entity, he shall follow the similar procedure as laid down in paragraph 4.2 to 4.6 above for State Nodal Officer. Further the ROCs are required to ensure that no company or limited liability Partnership firm shall be allowed to be registered if any of the designated individual/ entity is the Director/ Promoter/ Partner or beneficial owner of such company or firm, and in case such a request is received, the ROC should inform the Section 12A Nodal Officer in the Ministry of Corporate Affairs.

(viii) All communications to Nodal officer as enunciated in subclauses (i) to (vii) above should, inter alia, include the details of funds and assets held and the details of transaction.

(ix) The Other DNBPs are required to ensure that if any designated individual/entity approaches them for a transaction or relationship or attempts to undertake such transactions, the dealer should not carry out such transaction and, without delay, inform the Section 12A Central Nodal officer. The communication to the Central Nodal Officer would include the details of funds and assets held and the details of the transaction.

Also, If the dealers hold any assets or funds of the designated individual/entity, they shall freeze the same without delay and inform the Section 12A Central Nodal officer.

(DNFBPs shall have the same meaning as the definition in Section 2(1) (sa) of Prevention of Money-Laundering Act, 2002.)

5.1. All Natural and legal persons holding any funds or other assets of designated persons and entities, shall, without delay and without prior notice, freeze any transaction in relation to such funds or assets and shall immediately inform the State Nodal officer along with details of the funds/assets held, who in turn would follow the same procedure as in para 4.2 to 4.6 above for State Nodal Officer. This obligation should extend to all funds or other assets that are owned or controlled by the designated person or entity, and not just those that can be tied to a particular act, plot or threat of proliferation; those funds or other assets that are wholly or jointly owned or controlled, directly or indirectly, by designated persons or entities; and the funds or other assets derived or generated from funds or other assets owned or controlled directly or indirectly by designated persons or entities, as well as funds or other assets of persons and entities acting on behalf of, or at the direction of designated persons or entities.

5.2 No person shall finance any activity related to the 'designated list' referred to in Para 2.1, except in cases where exemption has been granted as per Para 6 of this Order.

5.3. Further, the State Nodal Officer shall cause to monitor the transactions / accounts of the designated individual/entity so as to prohibit any individual or entity from making any funds, financial assets or economic resources or related services available for the benefit of the individuals or entities in the designated list. The State Nodal Officer shall, upon becoming aware of any transactions and attempts by third party, without delay, bring the incidence to the notice of the CNO and the DGP/Commissioner of Police of the State/UT for initiating suitable action.

5.4 Where the CNO has reasons to believe that any funds or assets are violative of Section 12A (1) or Section 12A (2)(b) of the Act, he shall, by order, freeze such funds or Assets, without any delay, and make such order available to authorities, Financial Institutions, DNFBPs and other entities concerned.

5.5 The CNO shall also have the power to issue advisories and guidance to all persons, including Fls and DNFBPs obligated to carry out sanctions screening. The concerned Regulators shall take suitable action under their relevant laws, rules or regulations for each violation of sanction screening obligations under section 12A of the WMD Act.

6. Regarding exemption, to be granted to the above orders

6.1. The above provisions shall not apply to funds and other financial assets or economic resources that have been determined by the CNO to be: -

(a) necessary for basic expenses, including payments for foodstuff, rent or mortgage, medicines and medical treatment, taxes, insurance premiums and public utility charges, or exclusively for payment of reasonable

professional fees and reimbursement of incurred expenses associated with the provision of legal services or fees or service charges for routine holding or maintenance of frozen funds or other financial assets or economic resources, consequent to notification by the MEA authorizing access to such funds, assets or resources.

This shall be consequent to notification by the MEA to the UNSC or its Committee, of the intention to authorize access to such funds, assets or resources, and in the absence of a negative decision by the UNSC or its Committee within 5 working days of such notification.

(b) necessary for extraordinary expenses, provided that such determination has been notified by the MEA to the UNSC or its Committee and has been approved by the UNSC or its Committee.

6.2. The accounts of the designated individuals/ entities may be allowed to be credited with:

(a) interest or other earnings due on those accounts, or

(b) payments due under contracts, agreements or obligations that arose prior to the date on which those accounts became subject to the provisions of section 12A of the Act.

Provided that any such interest, other earnings and payments continue to be subject to those provisions under para 3.3.

6.3 Any freezing action taken related to the designated list under this Order should not prevent a designated individual or entity from making any payment due under a contract entered into prior to the listing of such individual or entity, provided that:

(i) the CNO has determined that the contract is not related to any of the prohibited goods, services, technologies, or activities, under this Act, or under the United Nations (Security Council) Act, 1947 or any other relevant Act for the time being in force, or by an order issued under any such Act, in relation to weapons of mass destruction and their delivery systems.

(ii) the CNO has determined that the payment is not directly or indirectly received by an individual or entity in the designated list under this Order; and

(iii) the MEA has submitted prior notification to the UNSC or its Committee, of the intention to make or receive such payments or to authorise, where appropriate, he unfreezing of funds, other financial assets or economic resources for this purpose, ten working days prior to such authorization

7. Regarding procedure for unfreezing of funds, financial assets or economic resources or related services of individuals/entities inadvertently affected by the freezing mechanism upon verification that the individual or entity is not a designated person or no longer meet the criteria for designation:

7.1 Any individual/entity, if it has evidence to prove that the freezing of funds, financial assets or economic resources or related services, owned/held has been inadvertently frozen, an application may be moved giving

the requisite evidence, in writing, to the relevant RE/Registrar of Immovable Properties/ ROC/Regulators and the State.

7.2 The RE/Registrar of Immovable Properties/ROC/Regulator and the State Nodal Officer shall inform, and forward a copy of the application, together with full details of the asset frozen, as given by applicant to the CNO by email, FAX and by Post, within two working days. Also, listed persons and entities may petition a request for delisting at the Focal Point Mechanism established under UNSC Resolution.

7.3 The CNO shall cause such verification, as may be required on the basis of the evidence furnished by the individual/entity, and, if satisfied, it shall pass an order, without delay, unfreezing the funds, financial assets or economic resources or related services, owned/held by such applicant, under intimation to all RE/Registrar of Immovable Properties/ROC/Regulators and the State Nodal Officer. However, if it is not possible, for any reason, to pass an Order unfreezing the assets within 5 working days, the CNO shall inform the applicant expeditiously.

7.4 The CNO shall, based on de-listing of individual and entity under UN Security Council Resolutions, shall pass an order, if not required to be designated in any other order, without delay, unfreezing the funds, financial assets or economic resources or related services, owned/held by such applicant, under intimation to all RE/Registrar of Immovable Properties/ROC/Regulators and the State Nodal Officer.

8. Procedure for communication of compliance of action taken under Section 12A: The CNO and the Nodal Officer in the Foreigners Division, MHA shall furnish the details of funds, financial assets or economic resources or related services of designated individuals/entities, frozen by an order, and details of the individuals whose entry into India or transit through India was prevented, respectively, to the Ministry of External Affairs, for onward communication to the United Nations.

9. Communication of the Order issued under Section 12A: The Order issued under Section 12A of the Act by the CNO relating to funds, financial assets or economic resources or related services, shall be communicated to all nodal officers in the country.

10. This order is issued in suppression of F.No.P-12011/14/2022-ES Cell-DOR, dated 30th January 2023.

11. All concerned are requested to ensure strict compliance of this order.