



Policy on “Know Your Customer” and Anti-Money Laundering measures

1. Background

To prevent fraudulent and Benami Transactions, RBI is issuing guidelines time to time. In September 2002 the RBI introduced “Know Your Customer” norms for the purpose.

On the basis of the same branches were advised from time to time to ensure the same.

Considering the guidelines issued by the RBI from time to time, we have formulated Policy on “Know Your Customer” and Anti-Money Laundering measures and got it approved by the Board. The policy is being reviewed and amended from time to time on the basis of guidelines issued by RBI. As a part of it, policy is now amended in terms of RBI circular dated 01-04-2021 and 05-05-21 as also remark in RBI Inspection report.

2. Customer Acceptance Policy (CAP)

No branch shall allow the opening of or keep any anonymous account or account in fictitious names or account on behalf of other persons whose identity has not been disclosed or cannot be verified.

- i. Not to open an account where the branch is unable to verify the identity and/or obtain documents required due to non-cooperation of the customer or non reliability of the data/information furnished to the branch.
- ii. Decision to close an account may be taken after giving due notice to the customer, explaining the reasons for such a decision.
- iii. The Customer profile should not be disclosed to outsiders, except compulsion under any act or law of the state/central government.
- iv. Branches to apply enhanced diligence measures where volume of transactions does not match with the customer’s status.
- v. The decision to open an account for Politically Exposed Party (PEP) will be taken at Control Centre.
- vi.

3. Risk Management

Accounts to be opened only after interviewing the customer. In interview following aspects to be discussed -

- i. Nature of business activity
- ii. Location of customer.
- iii. Volume of turnover
- iv. Cash requirement
- v. Social and Financial status.

On the basis of the same, branch to categories account as low, medium and high risk category. However irrespective of the above, accounts of Public Trust, Jewelers/Bullion traders, Builders, Multi-level marketing co. and political exposed persons to be categorized as High Risk while accounts of hoteliers are to be categorized as Medium risk.



Prime co-operative Bank Ltd.

Your BANK FOR you

4. Customer Identification Procedure (CIP)

4.1 Individual account

a. To establish the identity of each new customer, his address/location Branch to obtain any one of the “Officially Valid Document” (OVD) as under -

- i. passport,
- ii. driving license,
- iii. proof of possession of Aadhaar number, in such form as are issued by the Unique Identification Authority of India.
- iv. Voter's Identity Card issued by the Election Commission of India,
- v. job card issued by NREGA duly signed by an officer of the State Government and
- vi. letter issued by the National Population Register

In a case, if customer wants to provide a current address, different from the address as per Aadhar, he may give a self-declaration to that effect to the Bank.

- b. At least one document pertaining to the nature of business or financial status such as
 - i. salary slip, or
 - ii. Registration certificate, or
 - iii. Certificate / license issued by the municipal authorities under Shop and Establishment Act,
 - iv. GST certificates,
 - vi. Certificate / registration document issued by Professional Tax authorities,
 - vi. License / certificate of practice issued by any professional body incorporated under a statute,
 - vii. Complete Income Tax Returns (Not just the acknowledgement) etc.

However, customers who don't have business / financial activity or don't have any proof in this regard such as housewife, student, minor, labor working in un-organized sector, farmers etc may submit self-declaration to this effect.

Explanation: For the purpose of this clause, 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.

- c. Branch to obtain recent photograph of all the persons who are going to operate the account.
- d. Branch to obtain the Permanent Account Number or Form No. 60 as defined in Income-tax Rules, 1962 of all the persons who are going to operate the account.

4.1.1 Where the account is to be opened/operated by P/A holder, the branch to verify the original power of attorney and also to verify the CDD of P/A holder.



Prime co-operative Bank Ltd.

Your **BANK FOR you**

4.1.2 The customer shall not be required to furnish an additional OVD (Officially Valid Documents), if the OVD submitted by the customer for KYC contains proof of identity and address also.

4.1.3 If an existing KYC compliant customer desires to open another account with the same branch or another branch, there shall be no need for a fresh CDD exercise, provided the same is not due for periodic verification.

4.1.4 For the purpose of verifying the identity of customers at the time of commencement of an account-based relationship, branch shall at their option, rely on customer due diligence done by the Central KYC Records, however it is to be confirmed with CKYC within two days.

4.1.5 Customer due diligence (CDD) to be followed for all the joint account holders while opening a joint account.

4.1.6 Where the customer has submitted, Aadhaar number, branch shall carry out authentication of the customer's Aadhaar number using e-KYC authentication facility provided by the Unique Identification Authority of India. Instead of carrying out digital KYC, the Bank may obtain a certified copy of the proof of possession of Aadhaar number or the OVD Branch may carry out Aadhaar authentication/ offline-verification of an individual who voluntarily uses his Aadhaar number for identification purpose. In cases where successful authentication has been carried out, other OVD and photograph need not be submitted by the customer.

4.1.7 Since introduction is not necessary for opening of accounts under PML Act and Rules or Reserve Bank's extant KYC instructions, branch should not insist on introduction for opening bank accounts of customers.

4.1.8 Conversion of Account from Minor to Major:

On attaining majority, the erstwhile minor should confirm the balance in his/her account and if the account is operated by the guardian/legal guardian, fresh operating instructions and specimen signature of erstwhile minor should be obtained. All documents, including fresh photograph, as per the above mentioned KYC is also to be obtained.

Customer (minor who has turned major) to sign in the presence of Branch Manager. Branch Manager to certify the same as "signed in my presence" next to the customer signature along with his signature and employee code.

4.1.9 Small account

If an individual is not able to submit OVD and still, desire to open a bank account, branch shall open a "Small Account", which entails the following limitations:

- (i) the aggregate of all credits in a financial year does not exceed rupees one lakh;
- (ii) the aggregate of all withdrawals and transfers in a month does not exceed rupees ten thousand; and
- (iii) the balance at any point of time does not exceed rupees fifty thousand.

Provided, that this limit on balance shall not be considered while making deposits through Government grants, welfare benefits and payment against procurements.



Prime co-operative Bank Ltd.

Your **BANK FOR you**

Further, small accounts are subject to the following conditions:

- a) The branch shall obtain a self-attested photograph from the customer.
- b) The designated officer of the branch certifies under his signature that the person opening the account has affixed his signature or thumb impression in his presence.
- c) Branch to manually monitor and ensure that foreign remittances are not credited to the account.
- d) The account shall remain operational initially for a period of twelve months which can be extended for a further period of twelve months, provided the account holder applies and furnishes evidence of having applied for any of the OVDs during the first twelve months of the opening of the said account.

4.2 Accounts of proprietary firm

For opening an account in the name of a sole proprietary firm, CDD of the individual (proprietor) shall be carried out.

In addition to the above, any two of the following documents thereof as a proof of business / activity in the name of the proprietary firm shall also be obtained:

- (i) Registration certificate
- (ii) Certificate/License issued by the municipal authorities under Shop & Establishment Act.
- (iii) Income tax returns.
- (iv) GST certificate (provisional / final).
- (v) Certificate / registration document issued by Professional Tax Authorities.
- (vi) IEC (Importer Exporter Code) issued to the proprietary concern by the office of DGFT
- (vii) License / certificate of practice issued in the name of the proprietary concern by any professional body incorporated under a statute.
- (viii.) 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.
- (ix) Utility bills such as electricity, water, and landline telephone bills as a proof of business/ activity in the name of the proprietary firm

4.2.1 But newly started Proprietary Concerns may face difficulty in submitting particularly any of two documents at the time of opening of new account in the name of proprietary concern for following reasons:

- i) Bank account in the name of proprietary concern is necessary before applying for CST/VAT/IEC/Shops & Establishment registration.
- ii) Being newly established proprietary firm, the copy of IT return will be available only after filing the same after the close of the financial year.
- iii) The proprietorship firms which are situated outside the municipal limits are not issued license/ certificate by Municipal Corporation under shops & Establishment Act as they are operating out of the jurisdiction of Municipal Corporation. In such cases the local administration viz. panchayat, Govt. notified Area which are situated outside Municipal Corporation limit do not issue such license/certificates.
- iv) It is generally seen that each individual member of family conducts their business through their independent proprietorship and all such proprietorship firms of family members operate



Prime co-operative Bank Ltd.

Your **BANK FOR you**

under one shop/office, in such case it is difficult for each one to provide address proof separately.

In this context and in terms of the RBI circulars under reference, banks are allowed to frame their customer Acceptance policy by taking reasonable measures to identify the beneficial owner(s) and verify his/her/their identity in a manner so that it is satisfied that it knows who the beneficial owner(s) is/are.

In view of the same branch is allowed to open account by accepting only one documents as mentioned herein above and any one documents from the following –

- i. SME registration certificate,
- ii. Allotment letter of GIDC.
- iii. In case of units located outside the Municipal limits, i.e. located in gram Panchayat/ industrial township etc. Branches should address a letter to the village Sarpanch/ Dy. Sarpanch or notified area authority mentioning that the information is requested for opening of bank account and such information is now required under R.B.I. guidelines and therefore, requesting for a letter to the bank informing/indicating that-
 - a. The particular person is a resident of the particular area,
 - b. He runs a particular business in the name and style of &
 - c. The address of the firm
- iv. Affidavit before Notary public by the proprietor that he has established the said firm for carrying out the business at the address stated in the affidavit.
- v Undertaking to submit GST registration certificate, if applicable, within 3 months of opening the account, IT return of the firm after the closure of Financial Year but before 30th September of the succeeding year also to be obtained.

In the event of non-submission of documents, as promised, branch to stop operations in the a/c until requisite documents are submitted to the bank.

- vi Acknowledgement /Receipt of GST application deposited with the Govt. Dept.
- vii Certified true copy of Notarized Rent Agreement evidencing address of proprietary firm along with ID and address proof of landlord of premises.
- viii Chartered Accountant's certificate stating, Name of proprietor, address of proprietorship firm and also stating that the firm has submitted application for obtaining GST number through them and shall be submitted in three month's time.

In the event of non-submission of documents, as promised, branch to stop operations in the a/c until requisite documents are submitted to the bank.

- ix Visit of the business place, by branch officials and its reports to be kept on record.
- x. Photograph of the shop/establishment showing the name Board and the proprietor concerned together should be taken and kept with KYC documents on branch record.

4.3. For opening an account of a company

Certified copies of each of the following documents shall be obtained:

- (i) Certificate of incorporation;
- (ii) Memorandum and Articles of Association;
- (iii) Permanent Account Number of the company;
- (iv) Resolution to open an account.



Prime co-operative Bank Ltd.

Your **BANK FOR you**

(v) Resolution from the Board of Directors and power of attorney granted to its managers, officers or employees to transact on its behalf;

(vi) OVD and PAN/Form 60, of beneficial owner, the managers, officers or employees, as the case may be, holding an attorney to transact on the company's behalf.

Explanation- For the purpose of this sub-clause beneficial owner means ownership of / entitlement to more than 25 per cent of the shares or capital or profits of the company. A declaration to that effect to be obtained.

(vii). Where the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

4.4. For opening an account of a partnership firm, the certified copies of each of the following documents or the equivalent e-document thereof shall be obtained:

(i) Registration certificate;

Explanation: Unregistered partnership firm shall be included under the term 'unincorporated association'.

(ii) Partnership deed;

(iii) Permanent Account Number of the partnership firm; and

(iv) OVD and PAN/Form 60 of beneficial owner, the managers, officers or employees, as the case may be, holding an attorney to transact on its behalf.

Explanation: For the purpose of this sub-clause, beneficial owner is the person(s), who, has / have ownership of / entitlement to more than 15 per cent of capital or profits of the partnership. A declaration to that effect to be obtained.

4.5 For opening an account of a trust,

Certified copies of each of the following documents shall be obtained:

i. Registration certificate;

Explanation: Unregistered trusts shall be included under the term 'unincorporated association'.

ii. Trust deed;

iii. Resolution to open an account

iv. Power of attorney/Resolution to transact on its behalf;

v. Permanent Account Number or Form No.60 of the trust; and

vi. OVD and PAN/Form 60, relating to beneficial owner, the managers, officers or employees, as the case may be, holding an attorney to transact on its behalf.

Explanation - Beneficial owner(s) shall include the trustee/the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership. A declaration to that effect to be obtained.

4.6. For opening an account of an unincorporated association or a body of individuals

Certified copies of each of the following documents or the equivalent e-document thereof shall be obtained:



Prime co-operative Bank Ltd.

Your **BANK FOR you**

- (i) Resolution of the managing body of such association or body of individuals to open an account;
- (ii) Permanent account number or Form No.60 of the unincorporated association or a body of individuals;
- (iii) Power of attorney/Resolution to transact on its behalf;
- (iv) OVD and PAN/Form 60, relating to beneficial owner, the managers, officers or employees, as the case may be, holding an attorney to transact on its behalf and

Explanation: the beneficial owner is the natural person(s), has / have ownership of/ entitlement to more than 15 per cent of the property or capital or profits of the unincorporated association or body of individuals. A declaration to that effect to be obtained.

4.6.1 Where no natural person is identified, the beneficial owner is the relevant natural person who holds the position of senior managing official.

4.7. For opening an account of Co-operative society

Certified copies of each of the following documents or the equivalent e-document thereof shall be obtained:

- i. Registration certificate
- ii. Resolution of the managing body to open an account.
- iii. Permanent account number or Form No.60 of the society
- iv. Power of attorney/Resolution to transact on its behalf;
- v. OVD and PAN/Form 60, relating to beneficial owner, the managers, officers or employees, as the case may be, holding an attorney to transact on its behalf

Explanation: the beneficial owner is the natural person(s), who holds the position of senior managing official. A declaration to that effect to be obtained.

4.8. For opening an account of Hindu Undivided Family

Certified copies of each of the following documents shall be obtained:

- (i) OVD and PAN/Form 60 of the Karta and Major Coparceners,
- (ii) Declaration of HUF and its Karta,
- (iii) Recent Passport photographs duly self-attested by major co-parceners along with their names and addresses.

4.9 Accounts of Politically Exposed Persons (PEPs)

4.9.1 The decision to open an account for Politically Exposed Party (PEP) will be taken at Control Centre. (“Politically Exposed Persons” (PEPs) are individuals who are or have been entrusted with prominent public functions in a foreign country, Heads of States/Governments, senior politicians, senior government/ judicial/military officers, senior executives of state-owned corporations, important political party officials, etc.)

4.9.2 Branch shall have the option of establishing a relationship with PEPs provided that:



Prime co-operative Bank Ltd.

Your **BANK FOR you**

- (i) sufficient information including information about the sources of funds accounts of family members and close relatives is gathered on the PEP;
- (ii) the identity of the person shall have been verified before accepting the PEP as a customer;
- (iii) the decision to open an account for a PEP is taken at Control Centre in accordance with the Bank's Customer Acceptance Policy;
- (iv) all such accounts are subjected to enhanced monitoring on an on-going basis;
- (v) in the event of an existing customer or the beneficial owner of an existing account subsequently becoming a PEP, approval from control centre to be obtained to continue the business relationship;
- (vi) the CDD measures as applicable to PEPs including enhanced monitoring on an on-going basis are applicable.

4.9.3 These instructions shall also be applicable to accounts where a PEP is the beneficial owner.

4.10. Opening of account of Self Help Groups (SHGs)

- (a) CDD of all the members of SHG shall not be required while opening savings bank account of SHG. However, CDD of all the members of SHG to be undertaken at the time of credit linking SHG.
- (b) CDD all the office bearers shall suffice.

5. Ongoing Due diligence

5.1 Every branch shall exercise ongoing due diligence with respect to the business relationship with every client and closely examine the transactions in order to ensure that they are consistent with their knowledge of the client, his business and risk profile and where necessary, the source of funds.

- i. When there are suspicions of money laundering or financing of the activities relating to terrorism or where there are doubts about the adequacy or veracity of previously obtained customer identification data, every branch shall review the due diligence measures including verifying again the identity of the client and obtaining information on the purpose and intended nature of the business relationship, as the case may be.
- ii. Wherever doubt arise, the branch may ask the customer to furnish Income Tax Return and/or Balance sheet
- iii. Branch to maintain proper record of all cash transactions (receipt and payment) of Rs. 5 lacs and above.

5.2 In view of the risks involved in cash intensive businesses, accounts of bullion dealers (including sub-dealers), PEP, Builder, MLM & Jewelers should also be categorized by branches as "high risk" requiring enhanced due diligence.

5.3 Branch to have close monitoring for following types of transactions



Prime co-operative Bank Ltd.

Your **BANK FOR you**

- (a) Large and complex transactions including RTGS transactions, and those with unusual patterns, inconsistent with the normal and expected activity of the customer, which have no apparent economic rationale or legitimate purpose.
- (b) Transactions which exceed the thresholds prescribed for specific categories of accounts.
- (c) High account turnover inconsistent with the size of the balance maintained.
- (d) Deposit of third party cheques, drafts, etc. in the existing and newly opened accounts followed by cash withdrawals for large amounts.

5.A Updating risk category

Once the risk is assigned to the account, customer's transaction activity profile is to be reviewed periodically and accordingly risk is to be changed as under –

- All freeze, dormant and unclaimed accounts to be updated as high risk on daily basis.
- All NPA accounts to be updated as high risk on daily basis.
- All accounts to also reviewed annually (on the beginning of financial year) on the basis of turnover in the account as under

Type of Account	Credit summation limit (Annual) (Rs.)	Risk Category
Savings	UP TO 10,00,000	Low Risk
	10,00,001 TO 15,00,000	Medium Risk
	ABOVE 15,00,000	High Risk
Current	UP TO 50,00,000	Low Risk
	50,00,001 TO 1,00,00,000	Medium Risk
	ABOVE 1,00,00,000	High Risk
FIXED DEPOSIT	UP TO 25,00,000	Low Risk
	25,00,000 TO 50,00,000	Medium Risk
	ABOVE 50,00,000	High Risk
RECURRING	UP TO 1,20,000	Low Risk
	1,20,000 TO 2,40,000	Medium Risk
	ABOVE 2,40,000	High Risk
CCOD	UP TO 2,50,00,000	Low Risk
	2,50,00,001 TO 5,00,00,000	Medium Risk
	ABOVE 5,00,00,000	High Risk

If any one account is updated as medium or high risk, then maximum risk category to be updated in all other accounts also.

6. Closure of accounts

Where the branch is unable to apply appropriate KYC measures due to non-furnishing of information and /or non-cooperation by the customer, the branch should consider closing the



Prime co-operative Bank Ltd.

Your **BANK FOR you**

account or terminating the banking/business relationship after issuing due notice to the customer explaining the reasons for taking such a decision.

7. Local DD/Bankers' cheque

7.1 No DD or Bankers' cheque of Rs.50000/- and above to be obtained against cash.

7.2 If a branch has reason to believe that a customer is intentionally getting DDs/Bankers' cheque to below Rs. 50000/- to several beneficiaries in order to avoid reporting or monitoring, the branch must insist on complete customer identification before issuing DDs/Banker's cheque. In case of non-cooperation from the customer, efforts should be made to establish his identity and Suspicious Transaction Report (STR) should be made to Control Centre.

7.3 Name of purchaser to be printed on DD

8. Maintenance of records of transactions

Branches to maintain proper record of transactions as mentioned below:

- all cash transactions of the value of more than Rupees Ten Lakh or its equivalent in foreign currency;
- all series of cash transactions integrally connected to each other which have been valued below Rupees Ten Lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds Rupees Ten Lakh;

Explanation - Integrally connected cash transactions referred to at (b) above

The following transactions have taken place in a branch during the month of July 2011:

Date	Mode	Dr. (in Rs.)	Cr. (in Rs.)	Balance (in Rs.)
				BF 8,00,000.00
02/07/2011	Cash	5,00,000.00	3,00,000.00	6,00,000.00
07/07/2011	Cash	40,000.00	2,00,000.00	7,60,000.00
08/07/2011	Cash	4,70,000.00	1,00,000.00	3,90,000.00
Monthly Summation		10,10,000.00	6,00,000.00	

As per above clarification, the debit transactions in the above example are integrally connected cash transactions because total cash debits during the calendar month exceeds Rs. 10 lakhs. However, the bank should report only the debit transaction taken place on 02/07 & 08/07/2011. The debit transaction dated 07/07/2011 should not be separately reported by the branch, which is less than Rs.50, 000/-. All the credit transactions in the above example would not be treated as integrally connected, as the sum total of the credit transactions during the month does not exceed Rs.10 lakhs and hence credit transaction dated 02, 07 & 08/07/2011 should not be reported by banks.

- all cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security or a document has taken place facilitating the transaction and



Prime co-operative Bank Ltd.

Your **BANK FOR you**

d) all suspicious transactions whether or not made in cash and by way of as mentioned in the Rules.

8.1. Information to be maintained

Branches are required to maintain the following information, including necessary information required for reconstruction of the transactions referred herein above:

- i. the nature of the transactions;
- ii. the amount of the transaction and the currency in which it was denominated;
- iii. the date on which the transaction was conducted; and
- iv. the parties to the transaction

8.2 Maintenance and Preservation of record

a) Branches should maintain for at least 5 years from the date of transaction between the bank and the client, all necessary records of transactions, so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity.

b) Branches should ensure that records pertaining to the identification of the customer and his address (e.g. copies of documents like passports, identity cards, driving licenses, PAN card, utility bills etc.) obtained while opening the account and during the course of business relationship, are properly preserved for at least 5 years **after the business relationship is ended**. The identification records and transaction data should be made available to the competent authorities upon request.

c) Branches to pay special attention to all complex, unusual large transactions and all unusual patterns of transactions, which have no apparent economic or visible lawful purpose. All documents/office records/memorandums pertaining to such transactions and purpose thereof should, as far as possible, be examined and the findings at branch should be properly recorded. Such records and related documents should be made available to help auditors in their day-to-day work relating to scrutiny of transactions and also to Reserve Bank/other relevant authorities. These records are required to be preserved for ten years.

9. Periodical Updating of KYC

Periodicity of updation of KYC is defined risk category wise as under –

Particular	Low Risk	Medium Risk	High Risk
Full KYC exercise	Every 10 years	Every 8 Years	Every 2 Years

Periodic updation 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 by following any of the procedure mentioned hereunder:

- i. PAN verification from the verification facility available with the issuing authority and Authentication, of Aadhaar Number with the explicit consent of the customer in applicable cases.
- ii. Where Aadhaar is not available branches to obtain all the documents i.e. Photograph, Address Proof etc.
- iii. In case identification information available with Aadhaar does not contain current address an OVD containing current address may be obtained.
- iv. Obtaining a copy of OVD as stated in para No. 4.1 above.



Prime co-operative Bank Ltd.

Your **BANK FOR you**

In case there is no change in status for individual customer and legal entity with respect to their identities and addresses, a self-certification to that effect shall be obtained through customer's email-id/mobile number registered with the Bank, letter, ATMs, digital channels such as online banking/internet banking, mobile application etc.

However, where there is change in address for individual customer on self-declaration through customer's email-id/mobile number registered with the Bank, ATMs, digital channels such as online banking/internet banking, mobile application etc., it should be verified within two months by issuing address verification letter, contact point verification, deliverables etc.

In case of Legal entities, branch shall review the documents sought at the time of opening of account and obtain fresh certified copies. Branch also to ensure that beneficial ownership information available with them is accurate and shall update the same, if required, to keep it as up-to-date as possible.

The time limits prescribed above would apply from the date of opening of the account/ last verification of KYC.

e-KYC process using OTP based authentication. For the purpose of periodic updation is allowed, provided Customer Due Diligence was done at the time of opening of account.

10. Reporting Requirements to Financial Intelligence Unit - India

- i. The bank to 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. Such information to be reported without delay in the formats as per comprehensive reporting format guide, prescribed/ released by FIU-IND and Report Generation Utility and Report Validation Utility developed by them.
- ii. The bank shall not put any restriction on operations in the accounts where an STR has been filed. Bank shall keep the fact of furnishing of STR strictly confidential and there should not be tipping off to the customer at any level.
- iii. Bank to use robust software, throwing alerts when the transactions are inconsistent with risk categorization and updated profile of the customers shall be put in to use as a part of effective identification and reporting of suspicious transactions.
