




Need for Specific Requirements in AML/CFT Compliance


KYC/AML Chapter 3 Module B

Why are Specific Requirements Necessary?


 AML (Anti-Money Laundering) and CFT (Countering the Financing of Terrorism) measures are most effective when a **risk-based approach** is adopted.

 Banks deal with **various types of customers**, categorized based on their constitution and activities.

 Since different customers operate under **different statutes and legal frameworks**, their KYC (Know Your Customer) requirements must also vary.

 Product-based differentiation is also necessary due to **variations in features** (e.g., small accounts vs. wire transfers).

Regulatory Framework:

 **Prevention of Money Laundering (PML) Rules and RBI Guidelines** mandate different KYC guidelines for certain customer groups and banking products.

3.2 Specific Requirements: Select Customer Groups

Customers who are **legal entities (juridical persons)** have specific KYC and compliance requirements. These include:

1 Companies

2 Partnership Firms

3 Limited Liability Partnerships (LLPs)

4 Associations & Trusts (*Not covered in this section but follow similar principles.*)

3.2.1 Juridical Persons



3.2.1.1 Companies

◆ **Definition:** A company is a legal entity incorporated under **The Companies Act 1956** or **The Companies Act 2013** and operates under a **separate legal identity** from its owners.

◆ **Key Characteristics:**

- ✓ Incorporated under legal frameworks
- ✓ Subject to **corporate governance regulations**
- ✓ **Ownership (Shareholders) & Management (Executives) are separate**
- ✓ Key persons must be identified for AML compliance


 **KYC Document Requirements for Companies**

 Document Type	 Purpose
Certificate of Incorporation	Proof of legal existence
Memorandum & Articles of Association	Governance & operational framework
PAN of the Company	Tax identification
Board Resolution	Authorization for transactions
Power of Attorney (if any)	Delegation of authority
KYC of Beneficial Owners	Identification of individuals holding \geq 25% stake/control

 **Beneficial Owners (BOs):**

- ✓ Individuals holding \geq **25% stake/control/benefit** must be identified.
- ✓ Listed companies & subsidiaries are exempt.
- ✓ If the structure is too complex, the individual **controlling operations** is deemed the BO.

 **3.2.1.2 Partnership Firms**



 **Definition:** Partnership firms operate under the **Indian Partnership Act, 1932**.

📌 **Types:**

✓ **General Partnerships** (registration optional, but unregistered firms face legal limitations)

✓ **Limited Liability Partnerships (LLPs)** (registered under **LLP Act, 2008**)

📄 **KYC Document Requirements for Partnership Firms**

 Document Type	 Purpose
Registration Certificate (if registered)	Proof of legal existence
Partnership Deed	Details of partners & business operations
PAN of the Partnership Firm	Tax compliance
KYC of Beneficial Owners	Identification of partners with control

 **Beneficial Owners:**

✓ Individuals holding **significant control** ($\geq 15\%$ stake) must be identified.

📄 **3.2.1.3 Limited Liability Partnerships (LLPs)**



📌 **Definition:** LLPs are hybrid entities that combine **corporate & partnership benefits**.

📌 **Regulated under:** LLP Act, 2008

✦ Key Characteristics:

- ✓ **Separate legal identity from partners**
- ✓ **Perpetual succession** (partners may change, but LLP continues)
- ✓ **Requires at least 2 Designated Partners** (one must be an Indian resident)

📄 KYC Document Requirements for LLPs

 Document Type	 Purpose
Incorporation Document (Registered under LLP Act, 2008)	Proof of LLP's legal status
Designated Partner Identification Number (DPIN)	Government-issued ID for partners
PAN of LLP	Tax compliance
KYC of Beneficial Owners	Identification of individuals holding $\geq 15\%$ stake

🔍 Beneficial Owners:

- ✓ Those holding $\geq 15\%$ stake or **designated partners** must be identified.



Summary Table: KYC Requirements for Juridical


Persons


Customer Type	Key Regulatory Framework	KYC Requirements	Beneficial Owner Criteria
Companies	Companies Act 1956/2013	Incorporation Certificate, MoA & AoA, PAN, Board Resolution, POA, KYC of BOs	≥ 25% stake/control
Partnership Firms	Partnership Act 1932	Registration Certificate (if registered), Partnership Deed, PAN, KYC of BOs	Significant control (≥ 15%)
LLPs	LLP Act 2008	Incorporation Document, DPINs, PAN, KYC of BOs	≥ 15% stake / Designated Partners


Need for Specific Requirements in AML/CFT Compliance

3.2.1.4 Associations/ Body of Individuals

Characteristics:



 Unincorporated associations or bodies of individuals (BOIs), commonly referred to as "Associations," are not covered under any specific law.

 These entities are generally formed to undertake cultural, social, or professional activities, usually on a **non-commercial, non-profit** basis.

 Despite the lack of uniformity in their setup, they typically have a **managing body** responsible for decision-making.

 This category includes **unregistered trusts, partnership firms, and societies**.

KYC Document Requirements for Associations/BOIs

 Document Type	 Purpose
Resolution of the Managing Body	Proof of authority and governance
PAN of the Association/BOI	Tax identification
Power of Attorney (if any)	Delegation of authority

KYC of Beneficial Owners & Managing Body Members	Identifying individuals with control
Other Documents as Required by Banks/FIs	Legal proof of existence

Beneficial Owners:


✓ In most cases, associations **do not have individuals holding $\geq 15\%$ control/benefit.** ✓ Instead, **members of the managing body** who exercise control must be identified.


3.2.1.5 Trusts

Characteristics:



 Trusts can be categorized based on their **beneficiaries**:

1. **Public Trusts:** Benefiting a group of individuals (e.g., charities, NGOs)
2. **Private Trusts:** Benefiting specific individuals or families

 Some trusts are created with **specific individual funds**, while others collect **public donations**.

 Trustees manage the trust either **as named in the trust deed** or appointed per the trust's provisions.

 **KYC Document Requirements for Trusts**

 Document Type	 Purpose
Registration Certificate	Legal proof of the trust's existence
Trust Deed	Governance & operational framework
PAN of the Trust	Tax identification
KYC of Beneficial Owners, Trustees & Managers	Identifying key individuals

 **Beneficial Owners:**

✓ Beneficial owners include **the author, trustees, and beneficiaries** with **≥15% benefit**. ✓ In all cases, trustees **must** be identified. ✓ The **source of funds** must be verified.

3.2.1.6 Other Juridical Entities

✦ Characteristics:

👉 Includes **societies, universities, local bodies** like **village panchayats**.

👉 These entities engage in **non-commercial, administrative, or academic activities**.

📄 **KYC Document Requirements**

📄 Document Type	📄 Purpose
Proof of Authorized Representative	Identifies who can act on behalf of the entity
KYC of Beneficial Owners & Managers	Identifying key individuals
Additional Documents as Required	Establishes legal existence

🛡️ **Beneficial Owners:**

✓ Typically, these entities do **not have individuals with ≥15% control**.

✓ Instead, the **managing body members must be identified**.

🔒 3.2.1.7 Risks & Due Diligence for Juridical Persons

⚠️ Why Do Money Launderers/Fraudsters Use These Entities?

🔍 Common Methods Used:

- ✓ Concealing key individuals behind legal entities
- ✓ Appointing paid executives as a front
- ✓ Using benami shareholders/trustees

👉 Types of Fraudulent Transactions

🔒 Type of Fraud	🌐 Example
Hawala Transactions	Cross-border fund transfers via illegal networks
Trade-Based Money Laundering	Over/under-invoicing of goods
Fraudulent Transactions	Routing hacked RTGS, fake investments
Fake Claims from Government	Illicit tax refunds, duty drawbacks
MLM & Ponzi Schemes	Deceptive investment frauds
Terrorism Financing	Using trusts as a front for illicit fund collection

⚠ Due Diligence Measures

- ✓ Identify the **ownership and control structure**.
- ✓ Verify **legal form, senior management, office location, business activity**.
- ✓ Conduct **independent verification** beyond customer declarations.
- ✓ Monitor **actual transactions** to ensure alignment with declared activity.

3.2.2 Proprietary Firms



Characteristics & Risks

- ✓ A **single-owner business** structure.
- ✓ **KYC requirements similar to individuals**.
- ✓ High risk of **fraudulent activities**, including:
 - Routing hacked RTGS payments
 - Fake investment/job schemes
 - Tax refund frauds
- ✓ **No legal requirements for setup & no restriction on the number of firms a proprietor can have**.

 **KYC Document Requirements**




✓ **Customer identification** for the proprietor.

✓ **Any two business activity proofs:**

 Document	 Purpose
Registration Certificate	Proof of business legitimacy
Shop & Establishment Act License	Local business permit
GST Certificate	Tax compliance proof
Income Tax Return (ITR)	Validates financial activity
Utility Bills	Confirms business address
Import-Export Code (IEC)	Required for trade activities


✓ If only **one document** is available, banks may **waive** the second requirement upon verifying business legitimacy.

 **Summary Table: AML/KYC Requirements by Entity Type**

 Entity Type	 Key KYC Requirements	 Beneficial Owner Criteria
Companies	Incorporation Certificate, PAN, MoA & AoA, Board Resolution	≥25% control
Partnership Firms	Registration Certificate, Partnership Deed, PAN	≥15% control
LLPs	LLP Incorporation Document, DPINs, PAN	≥15% stake
Trusts	Registration Certificate, Trust Deed, PAN	≥15% benefit
Associations/BOIs	Managing Body Resolution, PAN	Managing body control
Proprietary Firms	Proprietor's KYC, Business Activity Proofs	Individual owner

Need for Specific Requirements in AML/CFT Compliance


3.2.3 Client Accounts Opened by Professional Intermediaries


 **Overview:** Certain professional intermediaries open bank accounts to transact on behalf of their clients (i.e., beneficial owners). The bank must assess the nature of these accounts and ensure compliance with AML/CFT guidelines.


Restrictions:

- Accounts **must not** be opened for intermediaries who cannot disclose their clients' details.

3.2.3.1 Specific Beneficial Owners

 If a single client's funds or multiple clients' funds (via sub-accounts) are routed through an intermediary's account, each **beneficial owner must be identified.**

 Even if funds are **co-mingled**, all beneficial owners must be verified.

 **Reliance on CDD:** Banks can rely on customer due diligence (CDD) performed by a regulated intermediary, but the **ultimate responsibility lies with the bank.**

3.2.3.2 Pooled Accounts

Certain entities like **mutual funds and pension funds** operate **pooled accounts** to conduct business activities.

✓ Such accounts can be opened **if due diligence is performed** to verify the legitimacy of funds.

✓ Required **registrations and approvals** must be obtained and documented.

3.2.3.3 Accounts of Other Intermediaries

✦ Some intermediaries, such as **stockbrokers**, maintain bank accounts for client transactions.

✓ Banks should ensure these intermediaries are **regulated and supervised entities**.

✓ Banks must **verify their KYC compliance** and maintain oversight.

✓ **Responsibility remains with the bank** to ensure KYC norms are followed.

3.2.4 Trusts/Nominee or Fiduciary Accounts

✦ **Definition:** These accounts are opened where a **customer acts in a fiduciary capacity**, holding funds for a third party.

✦ **Risks:** High potential for **money laundering (ML)** and **terrorist financing (TF)** due to unclear ownership structures.

✓ Due diligence must include:

1. **Identity of intermediaries**
2. **Identity of the actual beneficiaries and fund providers**
3. **Details of the arrangement**
4. **Purpose and need for the fiduciary relationship**

📖 3.2.5 Politically Exposed Persons (PEPs) - Resident Outside India

📄 3.2.5.1 Definition & Coverage

✓ **Foreign PEPs:** Individuals who hold or have held prominent public functions in a foreign country.

✓ Includes:

- Heads of State, senior politicians
- Senior government/judicial/military officials
- Executives of state-owned corporations
- Important political party officials

✓ **Extended coverage:** Close associates and family members of PEPs.

3.2.5.2 RBI Guidelines

✓ Applies to **foreign PEPs, their family members, close relatives, and entities where they are beneficial owners.**

✓ Some banks also apply these guidelines to **domestic PEPs.**

✓ **Due diligence includes:**


- Gathering sufficient information
- Public domain verification
- Identity and fund source verification

✓ **Account Approval:**

- Must be approved at a **senior management level.**
- If an existing customer becomes a PEP, approval is required to continue the relationship.

✓ **Ongoing Monitoring:** Enhanced CDD & continuous transaction monitoring.

3.2.6 Non-Face-to-Face Customers

 **Definition:** Customers who open accounts **remotely**, without visiting a branch or meeting bank officials.

 **Risk Mitigation Measures**

✓ Document certification

✓ Additional documentation if needed

✓ First payment from an existing bank account

✓ For cross-border customers:

- Certification of documents by a regulated third party.

3.2.6.1 Accounts Opened Using OTP-Based e-KYC

✓ Conditions:

Condition	Requirement
Customer Consent	Explicit consent required for OTP authentication
Balance Ceiling	Cannot exceed ₹1 lakh; accounts freeze upon exceeding limit until full KYC is completed.
Credit Ceiling	Cannot exceed ₹2 lakh per financial year.
Loan Sanction	Only term loans up to ₹60,000 per year allowed.
Tenure	Accounts valid for one year unless full KYC is completed.
No CDD Completion	Deposit accounts closed immediately; loan accounts restricted.


Single Declaration	Customer must declare they haven't opened another OTP-based KYC account.
Monitoring	Strict monitoring & alerts for non-compliance.


3.2.7 Joint Accounts & Add-On Card Holders

 **KYC procedures** must be conducted for:

- ✓ **Each joint account holder** in a joint bank account.
- ✓ **Each add-on cardholder** for a credit card.

3.2.8 Foreign Student Accounts

 **Foreign students** coming to India for study require bank accounts to receive funds.

 **Non-Resident Ordinary (NRO) accounts** can be opened for them.

Documents Required

- ✓ **Passport** (with visa & immigration stamp)
- ✓ **Proof of identity and address** in home country
- ✓ **Photograph**

✓ **Admission letter** from an Indian educational institution

⚠ **Restrictions & Risk Mitigation**

✓ **Local Address Declaration:** Must be provided within **30 days** of account opening.

✓ **Transaction Limits (Pending Address Verification):**

Type	Limit
Foreign inward remittances	Max. USD 1,000
Monthly withdrawals	Max. ₹50,000
✓ Special Conditions:	

- Must comply with NRO account regulations.
- **Pakistani & Bangladeshi nationals** require **prior RBI approval** to open accounts.

Need for Specific Requirements in AML/CFT Compliance

3.2.9 Foreign Portfolio Investors (FPIs)

Overview:

- ✓ Foreign Portfolio Investors (FPIs) must be **registered with SEBI**.
- ✓ FPIs undergo **KYC verification by a SEBI-registered Custodian/Intermediary**.
- ✓ Banks may **rely on SEBI's KYC process** as per third-party reliance provisions under PML Rules.

3.2.10 Small Accounts

3.2.10.1 Purpose of Small Accounts

- ✓ Introduced for **financial inclusion**.
- ✓ Helps individuals **without an Officially Valid Document (OVD)** to access banking services.
- ✓ Serves as an **interim solution** until full KYC is completed.
- ✓ Governed by **PML Rules (2005)**.

✦ 3.2.10.2 Features of Small Accounts

◆ Feature	🔍 Details
Account Type	Savings Account
Credit Limit	₹1 lakh per year
Withdrawal Limit	₹10,000 per month (including transfers)
Balance Limit	₹50,000 at any time
Restrictions	No foreign inward remittance allowed

✦ 3.2.10.3 Procedure for Opening Small Accounts

✓ **Eligible Branches:** Only **CBS-linked branches** or branches where transactions can be monitored.

✓ **Eligible Customers:**

- Individuals without an **OVD**.
- Individuals without an **existing bank account**. ✓ **Documents**

Required:

- Self-attested **photograph**.
- **Signature/thumbprint** on the Account Opening Form. ✓

Verification:

- A **Designated Officer** must certify that the applicant signed in their presence.

3.2.10.4 Procedure for Account Operations

✓ **Validity Period: 12 months** initially.

✓ **Extension:** Additional **12 months** if the account holder applies for an **OVD** within the first 12 months.

✓ **Review & Closure:**

- If **OVD is not provided within 24 months**, account operations should cease.
- If balance is **zero**, the account should be **closed**.

3.2.11 Self Help Groups (SHGs)

 **Financial Inclusion Initiative:**

✓ **Relaxed KYC** procedures to support SHGs.

✓ No need for **Customer Due Diligence (CDD)** of all members when opening savings accounts.

✓ **CDD is required only for office bearers** at the time of account opening.

✓ **CDD of all members** is needed **at the time of credit linking**.

3.2.12 New Technology & Card Products

Emerging Risks:

✓ The rapid adoption of **digital banking, net banking, and card-based transactions** increases **money laundering risks**.

✓ **Mitigation Measures:**

- Closer monitoring of transactions.
- Collecting **specific details about customer occupation**.

✓ **Card-Based Products Covered:** Debit Cards, Credit Cards, Prepaid Cards, Stored Value Cards.

✓ **KYC Applies To:** Add-on & supplementary cardholders.

✓ **Due Diligence on Direct Sales Agents (DSAs):** DSAs selling cards must also undergo KYC verification.

3.2.13 Correspondent Arrangements (for Co-operative Banks)

Purpose:

✓ Some banks allow **co-operative banks/societies** to open accounts to issue **at-par cheques** to their customers.

✓ Used for **remittances and payments** to third parties.

✦ **Risk Mitigation Measures:**


✓ Banks should **review & monitor** each arrangement for risks like:


- **Money Laundering (ML)**
- **Terrorist Financing (TF)**
- **Credit & Reputation Risks** ✓ Commercial banks must:
- **Verify records** of co-operative banks/societies.
- Allow at-par cheque issuance **only for:**
 1. **Own use** of the co-operative bank.
 2. **KYC-compliant account holders** (transactions \geq ₹50,000 only via account debit).
 3. **Walk-in customers** (cash transactions below ₹50,000 per individual).
- **Ensure all at-par cheques are crossed 'Account Payee'.**
- **Maintain proper records** of at-par cheque transactions, including:
 1. Applicant's **name & account number**.
 2. **Beneficiary details**.
 3. **Date of issuance**.
- Ensure **sufficient balances** for smooth operations.

 **Following these guidelines ensures compliance, prevents fraud, and enhances financial security.** 

 **Need for Specific Requirements in AML/CFT Compliance**

3.2.14 Walk-in Customers

 **Definition:** ✓ A **Walk-in Customer** is a person who does not have an account-based relationship with the bank but conducts financial transactions with it.

 **KYC Requirements:** ✓ For transactions **₹50,000 or above**, prescribed **KYC documents** and **Customer Identification Procedures (CIP)** must be applied. ✓ If a customer **intentionally structures transactions** below the threshold to avoid detection, banks should consider filing a **Suspicious Transaction Report (STR)**. ✓ For **international transactions**, KYC requirements apply **regardless of the transaction amount**. ✓ If the transaction is below **₹50,000**, the bank must obtain:

- **PAN/Form 60**
- **Proof of Identity & Address**

3.2.14.1 Demand Drafts/Banker's Cheque/NEFT

✓ For amounts **₹50,000 and above**, transactions should be:

- **Only via account debit or cheque.**
- **Not allowed in cash.** ✓ Cheques, drafts, pay orders, or banker's cheques should not be accepted **beyond 3 months** from the date of issuance. ✓ The **purchaser's name** must be printed on demand drafts, pay orders, and banker's cheques issued **on or after September 15, 2018.** ✓ **PAN/Form 60** must be **obtained and verified** for applicable transactions as per **Income Tax Rule 114B.**

3.3 Specific Requirements: Select Business Activities

3.3.1 Wire Transfers

Overview:

- ✓ Wire transfers enable seamless global fund transfers but pose **high ML/TF risks.**
- ✓ FATF mandates **minimum information requirements** for wire transfers.
- ✓ BCBS provides guidance on **due diligence and transparency.**

📌 3.3.1.1 Domestic Wire Transfers

✓ For amounts **₹50,000 and above**, wire transfers must include:

- **Originator's Name**
- **Address**
- **Account Number** ✓ The **originating bank** is responsible for KYC of the **remitter**. ✓ The **receiving bank** is responsible for KYC of the **beneficiary**.

📌 3.3.1.2 Cross-Border Wire Transfers

✓ Cross-border wire transfers must include:

- **Originator's Name & Address**
- **Account Number or Unique Reference Number** ✓ **Norms to be followed:**
- Full details of the **beneficiary** must be included.
- Payment message information must not be altered or omitted.
- Banks must provide transaction details to other financial institutions when required.

📌 3.3.1.2.1 Exemptions

✓ **Interbank transfers and settlements** (where both originator and beneficiary are banks) are exempt from these requirements.

 **3.3.1.2 Responsibilities of Banks in the Chain**

✓ Ordering Bank (Originator's Bank):

- Ensure complete **originator details** accompany the wire transfer.
- Conduct **customer due diligence (CDD)** of the originator.
- Maintain transaction records.

✓ Intermediary Banks:

- Ensure **originator information is retained**.
- Conduct **due diligence** on correspondent banks.
- Monitor cross-border transactions and take action if required fields are blank.
- File STRs for suspicious transactions.

✓ Beneficiary Banks:

- Verify the **beneficiary's identity** as per KYC norms.
- Monitor transactions for **suspicious activity**.
- Ensure wire transfers have complete **originator information**.

 **3.3.2 Sale of Third-Party Products**


 **Overview:** ✓ Banks distribute third-party products such as:

- **Mutual Funds**

- **Life Insurance**
- **Other Financial Products** ✓ The respective financial entities (AMCs, insurance companies) are **primarily responsible for KYC/AML compliance.** ✓ **RBI guidelines require banks** to conduct KYC for customers purchasing third-party products through them.


Need for Specific Requirements in AML/CFT Compliance

3.4 Online Customer Onboarding Modalities

 **Overview:** ✓ Two primary methods for **digital customer onboarding:**

1. **Digital KYC** (under PML Rules)
2. **Video-CIP** (under KYC Directions) ✓ These methods enable **secure, remote onboarding** while ensuring AML/KYC compliance.

3.4.1 Digital KYC Process

 **Key Features:** ✓ Banks/Financial Institutions (REs) must provide a **Digital KYC application** at customer touchpoints. ✓ **Login access** via **ID & password, Live OTP, or Time-based OTP.** ✓ The customer

visits the branch or an official visits the customer. ✓ Live

Photograph Capture:

- Taken by an **authorized officer**.
- Embedded into the **Customer Application Form (CAF)**. ✓


Watermarking Details:

- CAF Number
- GPS Coordinates
- Authorized Official's Name & Unique Employee Code
- Date & Timestamp ✓ **Live Capture of Documents:**
- **Original OVD (Officially Valid Document)** or Aadhaar (if offline verification isn't possible).
- Document must be **placed horizontally** and **watermarked**. ✓

Customer Authentication:


- Customer **confirms details via OTP**, which serves as their **digital signature** on the CAF.

3.4.2 Masking of Aadhaar

 **Compliance with Aadhaar Laws (2019 Amendment):** ✓ If a customer submits **Aadhaar as an OVD** (not for government benefits), banks must ensure **redaction or masking** of the Aadhaar number. ✓ Aadhaar number should **not be visible** unless authentication is

required. ✓ Banks should refer to the **validity of Aadhaar-related laws** as applicable.

3.4.3 Video-Customer Identification Process (V-CIP)

 **Definition:** ✓ V-CIP is a video-based, real-time method for customer identification. ✓ It uses **facial recognition, document verification, and live interaction.** ✓ An authorized bank official conducts the **audio-visual customer due diligence (CDD).** ✓ A secure **audit trail** is maintained for compliance. ✓ V-CIP is **equivalent to face-to-face KYC.**

3.4.3.1 Permitted Situations for V-CIP

✓ **Customer Due Diligence (CDD) for New Customers:**

- **Individuals**
- **Proprietorship Firms** (including e-documents for business proof)
- **Authorized Signatories & Beneficial Owners (BOs) of Legal Entities** ✓ **Conversion of OTP-based e-KYC accounts into fully compliant KYC accounts.** ✓ **KYC Periodic Updates** for eligible customers.

3.4.3.2 V-CIP Procedure

✓ **Only trained officials** of the RE must conduct V-CIP. ✓ **Dynamic questioning** ensures that the session is **live & real-time**. ✓ The RE official **records video & audio** and captures **customer photograph**. ✓

Verification Methods:

- **OTP-based Aadhaar e-KYC authentication**
- **Offline Aadhaar Verification**
- **KYC details from CKYCR (using KYC Identifier)**
- **Equivalent e-documents from DigiLocker ✓ Aadhaar**

Redaction:

- Aadhaar must be **redacted or masked** in stored records. ✓

Offline Aadhaar Verification Compliance:

- XML file or Aadhaar **Secure QR Code** must be verified within **3 days** of generation. ✓ **Financial Profile Confirmation:**

- Customer confirms economic/financial details during V-CIP. ✓

PAN Card Capture:

- A **clear image** of the PAN card must be taken (unless an **e-PAN** is provided).

- **Printed e-PAN is not valid** for V-CIP. ✓ **Photograph**

Verification:

- The **Aadhaar/OVD & PAN photos** must **match** with the person on the V-CIP session. ✓ **Assisted V-CIP:**

- **Banking Correspondents (BCs)** may assist customers at the customer's end. ✓ **Operational Conditions:**
- **Accounts opened via V-CIP** must pass a **concurrent audit** before activation. ✓ **Data Storage Compliance:**
- All **V-CIP data & recordings** must be **stored in India.**

LEARNING SESSIONS