

August 5, 2008

All Non-Banking Financial Companies,  
Miscellaneous Non-Banking Companies,  
and Residuary Non-Banking Companies

Dear Sir,

**Prevention of Money Laundering Act, 2002 – Obligation of NBFCs in terms of Rules notified there under**

Please refer to our circular DNBS(PD). CC 68 /03.10.042/2005-06 dated April 5, 2006. In Paragraph 3 of the said circular, NBFCs were advised to go through the provisions of PMLA, 2002 and the Rules notified there under and take all steps considered necessary to ensure compliance with the requirements of section 12 of the Act *ibid*. Further, it was advised that NBFCs should also report information in respect of all transactions referred to in **Rule 3 *ibid*** to the Director, Financial Intelligence Unit-India (FIU-IND).

2. In terms of instructions contained in the guidelines on 'Know Your Customer Norms' and 'Anti-Money Laundering Measures' of our circular dated February 21, 2005, NBFCs are required to prepare a profile for each customer based on risk categorization. Further, vide paragraph 4 of our circular DNBS(PD). CC 68 /03.10.042/2005-06 dated April 5, 2006, the need for periodical review of risk categorization has been emphasized. It is, therefore, reiterated that NBFCs, as a part of transaction monitoring mechanism, are required to put in place an appropriate software application to throw alerts when the transactions are inconsistent with risk categorization and updated profile of customers. It is needless to add that a robust software throwing alerts is essential for effective identification and reporting of suspicious transactions.

3. In paragraph 7 of our circular dated April 5, 2006, referred to above, NBFCs were advised to initiate urgent steps to ensure electronic filing of cash transaction report (CTR) and Suspicious Transaction Reports (STR) to FIU-IND. It has been reported by FIU-IND that many NBFCs are yet to file electronic reports. It is, therefore, advised that in case of NBFCs, where all the branches are not yet fully computerized, the Principal Officer of the NBFC should cull out the transaction details from branches which are not computerized and suitably arrange to feed the data into an electronic file with the help of the editable electronic utilities of CTR/STR as have been made available by FIU-IND on their website <http://fiuindia.gov.in>.

4. In paragraph 7(l)(a) of our circular dated April 5, 2006, referred to above, NBFCs were advised to make Cash Transaction Reports (CTR) to FIU-India for every month latest by 15th of the succeeding month. It is further clarified that cash transaction reporting by branches/offices of NBFCs to their Principal Officer should invariably be submitted on monthly basis (**not on fortnightly basis**) and the Principal Officer, in turn, should ensure to submit CTR for every month to FIU-IND within the prescribed time schedule.

5. In regard to CTR, it is reiterated that the cut-off limit of Rupees ten lakh is applicable to integrally connected cash transactions also. Further, after consultation with FIU-IND, it is clarified that :

a) For determining integrally connected cash transactions, NBFCs should take into account all individual cash transactions **in an account during a calendar month**, where either debit or credit summation, computed separately, exceeds Rupees ten lakh during the month. However, while filing CTR, details of individual cash transactions below rupees fifty thousand may not be indicated. Illustration of integrally connected cash transactions is furnished in Annex-I to this circular;

b) CTR should contain only the transactions **carried out by the NBFC on**

**behalf of their clients/customers** excluding transactions between the internal accounts of the NBFC;

c) All cash transactions, where forged or counterfeit Indian currency notes have been used as genuine should be reported by the Principal Officer to FIU-IND immediately in the format (Counterfeit Currency Report – CCR) as per Annex-II, Annex-III. Electronic data structure has been furnished in Annex-IV to enable NBFCs to generate electronic CCRs. These cash transactions should also include transactions where forgery of valuable security or documents has taken place and may be reported to FIU-IND in plain text form.

6. As stated in paragraph 4 of the Guidelines on KYC Norms/AML Measures annexed to our circular DNBS(PD). CC 48 /10.42/2004-05 dated February 21, 2005, NBFCs are required 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. It is further clarified that the background including all documents/office records/memorandums pertaining to such transactions and purpose thereof should, as far as possible, be examined and the findings at branch as well as Principal Officer level should be properly recorded. These records are required to be preserved for ten years as is required under PMLA, 2002. Such records and related documents should be made available to help auditors in their work relating to scrutiny of transactions and also to Reserve Bank/other relevant authorities.

7. In paragraph 7 of our April 5, 2006 circular, NBFCs have been advised that the customer should not be tipped off on the STRs made by them to FIU-IND. It is likely that in some cases transactions are abandoned/aborted by customers on being asked to give some details or to provide documents. It is clarified that NBFCs should report all such **attempted transactions in STRs**, even if not completed by customers, irrespective of the amount of the transaction.

8. While making STRs, NBFCs should be guided by the definition of 'suspicious transaction' as contained in Rule 2(g) of Rules *ibid*. It is further clarified that NBFCs should make STRs if they have reasonable ground to believe that the transaction involve proceeds of crime generally **irrespective of the amount of transaction** and/or the threshold limit envisaged for predicate offences in part B of Schedule of PMLA, 2002 .

9. In the context of creating KYC/AML awareness among the staff and for generating alerts for suspicious transactions, NBFCs may consider the indicative list of suspicious activities contained in Annex-V.

10. These guidelines are issued under Sections 45K and 45L of the Reserve Bank of India Act, 1934. Any contravention of the said guidelines may attract penalties under the relevant provisions of the Act.

Yours faithfully,

( P Krishnamurthy )  
Chief General Manager In-Charge

## Annexure - I

### Illustration of Integrally connected cash transaction

The following transactions have taken place in a NBFC during the month of April, 2008:

Date	Mode	Dr. (in Rs.)	Cr. (in Rs.)	Balance (in Rs.) BF - 8,00,000.00
02/04/2008	Cash	5,00,000.00	3,00,000.00	6,00,000.00
07/04/2008	Cash	40,000.00	2,00,000.00	7,60,000.00
08/04/2008	Cash	4,70,000	1,00,000.00	3,90,000.00
Monthly summation		10,10,000.00	6,00,000.00	

i) 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 NBFC should report only the debit transaction taken place on 02/04 & 08/04/2008. The debit transaction dated 07/04/2008 should not be separately reported by the NBFC, which is less than Rs.50,000/-.

ii) 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.20 lakh and hence credit transaction dated 02, 07 & 08/04/2008 should not be reported by NBFC.

**COUNTERFEIT CURRENCY REPORT (CCR)**

Kindly fill in CAPITAL. Read the instructions before filling the form.

**PART 1 DETAILS OF REPORTING BRANCH/LOCATION**

1.1 Name of Entity	<input type="text"/>		
1.2 Name of Branch	<input type="text"/>		
1.3 Branch Reference Number	<input type="text"/>	1.4 ID allotted by FIU-IND	<input type="text"/>
1.5 Address (No., Building)	<input type="text"/>		
1.6 Street/Road	<input type="text"/>		
1.7 Locality	<input type="text"/>		
1.8 City/Town, District	<input type="text"/>		
1.9 State, Country	<input type="text"/>		
1.10 Pin code	<input type="text"/>	1.11 Tel (with STD code)	<input type="text"/>
1.12 Fax	<input type="text"/>	1.13 E-mail	<input type="text"/>

**PART 2 DETAILS OF COUNTERFEIT CURRENCY**

	Denomination	Number of pieces	Value
2.1	1000	<input type="text"/>	<input type="text"/>
2.2	<input type="checkbox"/> +	<input type="text"/>	<input type="text"/>
2.3	<input type="checkbox"/> +	<input type="text"/>	<input type="text"/>
2.4	<input type="checkbox"/> +	<input type="text"/>	<input type="text"/>
2.5	20	<input type="text"/>	<input type="text"/>
2.6	10	<input type="text"/>	<input type="text"/>
2.7	<input type="checkbox"/> +	<input type="text"/>	<input type="text"/>
2.8 Total Value of Counterfeit Currency			<input type="text"/>

**PART 3 DETAILS OF DETECTION**

3.1 Date of Cash Tendering	<input type="text"/>	3.2 Total Cash Deposited	<input type="text"/>
3.3 Date of Detection	<input type="text"/>		
3.4 Detected at	<input type="checkbox"/> A Cash Counter <input type="checkbox"/> D RBI's CVPS	<input type="checkbox"/> B Branch Level <input type="checkbox"/> Z Other	<input type="checkbox"/> C Currency Chest
3.5 Whether local police station has been informed	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
3.6 Details of FIR (if available)	<input type="text"/>		
3.7 Additional Information, if any	<input type="text"/>		

**PART 4 DETAILS OF RELATED PERSONS**

4.1 Name of Tendering Person	<input type="text"/>		
4.2 Name of Account Holder	<input type="text"/>		
4.3 Account / Card No.	<input type="text"/>		
	Signature	<input type="text"/>	
	Name	<input type="text"/>	
	Designation	<input type="text"/>	

DO NOT FILL. FOR FIU-IND USE ONLY.

CCR

## COUNTERFEIT CURRENCY REPORT (CCR) INSTRUCTIONS

### GENERAL INSTRUCTIONS

Under the Prevention of Money Laundering Act 2002 (PMLA), every reporting entity is required to furnish details of all cash transactions where forged or counterfeit currency notes of bank notes have been used as genuine. These transactions should be reported to Director, Financial Intelligence Unit, India not later than seven working days from the date of occurrence of such transactions.

### HOW TO SUBMIT

Every reporting entity branch must submit this form to the Director, FIU- IND only through the principal officer designated under PMLA.

**Note:** A separate Counterfeit Currency Report (CCR) should be filed for each incident of detection of counterfeit Indian currency. If the detected counterfeit currency notes can be segregated on the basis of tendering person, a separate CCR should be filed for each such incident.

### EXPLANATION OF SPECIFIC TERMS

#### PART 1: DETAILS OF REPORTING BRANCH / LOCATION

This section contains details of the branch/location where the counterfeit currency was detected.

- 1.1 Mention name of the reporting entity (bank, financial institution).
- 1.2 Mention name of the reporting branch/location.
- 1.3 Mention any unique number issued by the regulator or any temporary code to uniquely identify each branch/ location.
- 1.4 ID allotted by FIU-IND may be left blank till the same is communicated by FIU-IND.
- 1.10 Pincode should be a valid 6 digit numeric pincode of the branch/location.

#### PART 2: DETAILS OF COUNTERFEIT CURRENCY

This section contains the details of counterfeit currency. Total value of counterfeit currency should match with the total calculated value of Denomination x Number of pieces.

#### PART 3: DETAILS OF DETECTION

3.1 Mention the date on which cash was tendered, if available. Date should be reported in YYYYMMDD format. E.g. 2nd May, 2007 should be entered as 20070502.

3.2 Mention the total cash tendered by the tenderer including counterfeit currency, if available.

3.3 Mention the date on which counterfeit currency was detected in YYYYMMDD format. E.g. 2nd May 2007 should be entered as 20070502.

3.4 Select from the following counterfeit currency detection stages

- "A"- Cash Counter by the teller
- "B"- Branch Level during sorting
- "C"- Currency Chest while counting
- "D"- Currency Verification and Processing System at RBI
- "Z"- Other

3.5 Mention Yes, if local police station has been informed.

3.6 Mention details of FIR, police station etc., if available.

3.7 Mention additional information such as quality of counterfeit currency, sequence of events, if available.

#### PART 4: DETAILS OF RELATED PERSONS

4.1 Person who tendered the counterfeit currency, if available.

4.2 Name of the sole/first account holder in whose account counterfeit currency was tendered, if available.

4.3 Account/Card Number of the person in whose account the counterfeit currency was tendered, if available.

The form should be signed by an officer at the branch/controlling office/head office.

**SUMMARY OF COUNTERFEIT CURRENCY REPORTS**

Kindly fill in CAPITAL. Read the instructions before filling the form.

**PART 1 DETAILS OF THE PRINCIPAL OFFICER**

1.1 Name of Reporting Entity	<input type="text"/>		
1.2 Branch Reference Number	<input type="text"/>	1.3 ID allotted by FIU-IND	<input type="text"/>
1.4 Category of Entity	<input type="text"/>	<i>(Refer to Instructions)</i>	
1.5 Name of Principal Officer	<input type="text"/>		
1.6 Designation	<input type="text"/>		
1.7 Address (No., Building)	<input type="text"/>		
1.8 Street/Road	<input type="text"/>		
1.9 Locality	<input type="text"/>		
1.10 City/Town, District	<input type="text"/>		
1.11 State, Country	<input type="text"/>		
1.12 Pin code	<input type="text"/>	1.13 Tel (with STD code)	<input type="text"/>
1.14 Fax	<input type="text"/>	1.15 E-mail	<input type="text"/>

**PART 2 STATISTICS**

2.1 Number of Counterfeit Currency Reports enclosed	<input type="text"/>
2.2 Total Value of Counterfeit Currency	<input type="text"/>

DO NOT FILL. FOR FIU-IND USE ONLY

ACK. NO. DATE  2 | 0 | 0 

D D M M Y Y Y Y

Signature Name *(Should be same as the person mentioned in PART 1)*Date 

DO NOT FILL. FOR FIU-IND USE ONLY.

CCRS

## SUMMARY OF COUNTERFEIT CURRENCY REPORTS (CCRs)

**INSTRUCTIONS****GENERAL INSTRUCTIONS**

Under the Prevention of Money Laundering Act 2002 (PMLA), every reporting entity (bank, financial institution, intermediary) is required to furnish details of all cash transactions where forged or counterfeit currency notes of bank notes have been used as genuine. These transactions should be reported to Director, Financial Intelligence Unit, India not later than seven working days from the date of occurrence of such transactions.

One CCR should be submitted for each incident of detection of counterfeit Indian currency. If the counterfeit currency detected can be segregated on the basis of tendering person, a separate CCR should be filed for each such incident.

**How to submit**

The principal officer should submit this summary alongwith CCRs received from branches /locations to the Director, FIU-IND.

Address     Director, FIU-IND  
              Financial Intelligence Unit-India  
              6th Floor, Hotel Samrat  
              Chanakyapuri, New Delhi -110021  
              India

**EXPLANATION OF SPECIFIC TERMS****PART 1: DETAILS OF THE PRINCIPAL OFFICER**

1.3. ID allotted by FIU-IND may be left blank till the same is communicated by FIU-IND.

1.4. Category of the reporting entity

"A"-Public Sector Bank

"B"-Private Sector Bank

"C"-Foreign Bank

"D"-Co-operative Bank

"E"-Regional Rural Bank

"F"-Local Area Bank

"Z"-Other

1.5. Principal officer is the officer designated under PMLA.

**PART 2: STATISTICS**

2.1. Number of Counterfeit Currency Reports enclosed.

2.2. Total Value of counterfeit currency detected in the enclosed reports. (Sum of value is in 2.8 of each CCR).

**ALL CCRs MUST BE ENCLOSED.**



## **ANNEX - IV**

### **ELECTRONIC DATA STRUCTURE**

*Report* | **COUNTERFEIT CURRENCY REPORT**  
*Version* | **1.0**

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## Appendix

### Counterfeit Currency Report Summary of Counterfeit Currency Report

#### 1. Introduction

The Prevention of Money Laundering Act, 2002 (PMLA) forms the core of the legal framework put in place by India to combat money laundering. PMLA and the Rules notified thereunder came into force with effect from July 1, 2005. Director, FIU-IND and Director (Enforcement) have been conferred with exclusive and concurrent powers under relevant Sections of the Act to implement the provisions of the Act.

#### 2. Counterfeit Currency Report

The PMLA and Rules notified thereunder impose an obligation on banks, financial institutions and intermediaries of the securities market (reporting entity) to furnish details of all cash transactions where forged or counterfeit currency notes of bank notes have been used as genuine to the Director, FIU-IND.

A separate Counterfeit Currency Report (CCR) should be filed for each incident of detection of counterfeit Indian currency. If the detected counterfeit currency notes can be segregated on the basis of tendering person, a separate CCR should be filed for each such incident.

### 3. Due Date

These transactions should be reported to Director, Financial Intelligence Unit, India not later than seven working days from the date of occurrence of such transactions.

### 4. Methods of filing

The CCR should be submitted to the Financial Intelligence Unit – India (FIU-IND) at the following address:

Director, FIU-IND  
Financial Intelligence Unit-India  
6th Floor, Hotel Samrat  
Chanakyapuri, New Delhi -110021, India  
(Visit <http://fiuindia.gov.in> for more details)

Counterfeit Currency Reports can be filed either in manual or electronic format. However, the reporting entity must submit all reports to FIU-IND in electronic format if it has the technical capability to do so.

For reporting entities, which do not have technical capacity to generate report in electronic form, a report preparation utility for preparation of electronic Counterfeit Currency Report (CCRRPU.xls) can be downloaded from the website of the FIU-IND at <http://fiuindia.gov.in>

### 5. Manual format

Counterfeit Currency Reports in manual format consists of following forms:

Form	Information	Completed by
Summary of Counterfeit Currency Reports	Contains summary of enclosed CCRs	Principal officer of the reporting entity
Counterfeit Currency Report	Details of branch and counterfeit currency.	Reporting branch/office

The above forms are given in the Appendix.

### 6. Electronic format

FIU-IND is in the process of developing technological infrastructure to enable submission of electronic return over a secure gateway. In the interim, the reporting entities should submit the following to Director, FIU-IND:

- i) One CD containing three data files in prescribed data structure. A label mentioning name of the reporting entity, Unique code, type of report (CCR), report dated should be affixed on each CD for the purpose of identification.
- ii) Each CD should be accompanied by Summary of Counterfeit Currency Report for Reporting entity (same form should be used for both manual as well as electronic format) in physical form duly signed by the principal officer. This summary should match with the data in Control File (CCRCTL.txt).

Important:

- i) In case the size of data files exceeds the capacity of one CD, the data files should be compressed by using Winzip 8.1 or ZipltFast 3.0 (or higher version) compression utility only to ensure quick and smooth acceptance of the file.
- ii) The CD should be virus free.

## 7. Description of Data Files

In case of electronic filing, the consolidated CCR data should have following three data files:

S No.	Filename	Description
1	CCRCTL.txt	Control File
2	CCRBRC.txt	Branch File
3	CCRTRN.txt	Transaction File

## 8. Steps in preparation of data files

- i) The details of counterfeit currency should be captured in the Transaction File (CCRTRN.txt).
- ii) The details of branches should be captured in the Branch File (CCRBRC.txt).
- iii) The report level details and summary should be captured in the Control file. (CCRCTL.txt)

## 9. Steps in validation /sufficiency of data files

- i) There should be three data files with appropriate naming convention.
- ii) The data files should be as per specified data structure and business rules.
- iii) None of the mandatory fields should be left blank.
- iv) All dates should be entered in YYYYMMDD format.
- v) The summary figures in control file should match with the totals in other data files.
- vi) [Branch Reference Number] should be unique in Branch Data File (CCRBRC.txt)
- vii) All values of [Branch Reference Number] in Transaction Data File (CCRTRN.txt) should have matching [Branch Reference Number] value in Branch Data File (CCRBRC.txt)

## 10. General notes for all Data Files

- i) All Data Files should be generated in ASCII Format with ".txt" as filename extension.
- ii) Each Record (including last record) must start on new line and must end with a newline character. Hex Values: "0D" & "0A".
- iii) All CHAR fields must be left justified.
- iv) If CHAR field has no data or less data with respect to defined length, then the entire field (in case of no data) or the remaining field (in case of less data) has to be filled with right justified blank characters (Spaces).
- v) All NUM fields must be right justified.
- vi) If NUM field has no data or less data with respect to defined length, then the entire field (in case of no data) or the remaining field (in case of less data) has to be filled with left justified zeroes.
- vii) If DATE field has no data then the entire field has to be filled with blank characters (Spaces).
- viii) Fields with an asterisk (\*) have to be compulsorily filled up.

- ix) For fields that do not have an asterisk (\*), reasonable efforts have to be made to get the information. Enter "N/A" to indicate that the field is not applicable. Do not substitute any other abbreviations or special characters (e.g., "x", "-" or "\*\*").

#### 11. Data structure of Control File (CCRCTL.txt)

S. No	Field	Type	Size	From	To	Remarks
1.	Report Name*	CHAR	3	1	3	Value should be "CCR" signifying Counterfeit Currency Report
2.	Serial Number of Report*	NUM	8	4	11	Indicates the running sequence number of CCR for the reporting entity starting from 1
3.	Record Type*	CHAR	3	12	14	Value should be "CTL" signifying Control file
4.	Report Date*	NUM	8	15	22	Date of sending report to FIU-IND in YYYYMMDD format
5.	Reporting Entity Name*	CHAR	80	23	102	Complete name of the reporting entity (Bank, financial institution, intermediary)
6.	Reporting Entity Category*	CHAR	1	103	103	"A"-Public Sector Bank "B"-Private Sector Bank "C"-Foreign Bank "D"-Co-operative Bank "E"-Regional Rural Bank "F"-Local Area Bank "Z"-Other
7.	Unique code of the Reporting Entity*	CHAR	12	104	115	Unique code issued by the regulator, if applicable
8.	Unique ID issued by FIU*	CHAR	10	116	125	Use XXXXXXXXXXXX till the ID is communicated
9.	Principal Officer's Name*	CHAR	80	126	205	Field + filler spaces = 80
10.	Principal Officer's Designation*	CHAR	80	206	285	Field + filler spaces = 80
11.	Principal Officer's Address1*	CHAR	45	286	330	No., Building Field + filler spaces = 45
12.	Principal Officer's Address2	CHAR	45	331	375	Street/Road Field + filler spaces = 45
13.	Principal Officer's Address3	CHAR	45	376	420	Locality Field + filler spaces = 45
14.	Principal Officer's Address4	CHAR	45	421	465	City/Town, District Field + filler spaces = 45
15.	Principal Officer's Address5	CHAR	45	466	510	State, Country Field + filler spaces = 45

16.	Principal Officer's Pin code*	NUM	6	511	516	Pin code without "-" or space
17.	Principal Officer's Telephone	CHAR	30	517	546	Telephone in format STD Code-Telephone number
18.	Principal Officer's FAX	CHAR	30	547	576	Fax number in format STD Code-Telephone number
19.	Principal Officer's E-mail	CHAR	50	577	626	E-mail address
20.	Report Type*	CHAR	1	627	627	"N"- New Report "R"- Replacement to earlier submitted report
21.	Reason for Replacement*	CHAR	1	628	628	"A" – Acknowledgement of Original Report had many warnings or error messages. "B" – Operational error, data omitted in Original Report. "C" – Operational error, wrong data submitted in Original Report. "N"- Not Applicable as this is a new report "Z"- Other Reason
22.	Serial Number of Original Report *	NUM	8	629	636	Serial Number of the Original Report which is being replaced. Mention 0 if Report Type is "N"
23.	Operational Mode*	CHAR	1	637	637	"P"- Actual/ Production mode "T"- Test / Trial mode
24.	Data Structure Version*	CHAR	1	638	638	Value should be 1 to indicate Version 1.0
25.	Number of Counterfeit Currency Reports*	NUM	8	639	646	Number of CCRs enclosed in this summary. This figure should match with the number of records in CCRTRN.txt
26.	Total Value of Counterfeit Currency*	NUM	12	647	658	Total Value of Counterfeit Currency reported in enclosed CCRs. This figure should match with the sum of the Field Total Counterfeit Currency (S. No. 11) in CCRTRN.txt

## 12. Data structure of Branch File (CCRBRC.txt)

S. No.	Field	Type	Size	From	To	Remarks
1.	Record Type	CHAR	3	1	3	Value should be "BRC" signifying Control file
2.	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3.	Name of Branch*	CHAR	80	10	89	Name of branch/location where the counterfeit currency was tendered Field + filler spaces = 80
4.	Branch Reference Number*	CHAR	12	90	101	Unique Code issued by the regulator or any temporary code to uniquely identify each branch/office
5.	Unique ID issued by FIU*	CHAR	10	102	111	Use XXXXXXXXXXXX till the ID is communicated
6.	Branch Address1*	CHAR	45	112	156	No., Building Field + filler spaces = 45
7.	Branch Address2*	CHAR	45	157	201	Street/Road Field + filler spaces = 45
8.	Branch Address3	CHAR	45	202	246	Locality Field + filler spaces = 45
9.	Branch Address4	CHAR	45	247	291	City/Town, District Field + filler spaces = 45
10.	Branch Address5	CHAR	45	292	336	State, Country Field + filler spaces = 45
11.	Branch Pin code*	NUM	6	337	342	Pin code without "-" or space
12.	Branch Telephone	CHAR	30	343	372	Telephone number in format STD Code-Telephone number
13.	Branch Fax	CHAR	30	373	402	Fax number in format STD Code-Telephone number
14.	Branch E-mail	CHAR	50	403	452	E-mail address

### 13. Data structure of Transaction File (CCRTRN.txt)

S. No.	Field	Type	Size	From	To	Remarks
1.	Record Type*	CHAR	3	1	3	Value should be "TRN" signifying Transaction data file
2.	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3.	Branch Reference Number*	CHAR	12	10	21	Branch Reference Number of branch/location where counterfeit currency was tendered. Use any unique number issued by the regulator or any temporary code to uniquely identify each branch/ location
4.	Denomination1000	NUM	10	22	31	Number of counterfeit currency notes of Rs. 1000/- each
5.	Denomination500	NUM	10	32	41	Number of counterfeit currency notes of Rs. 500/- each
6.	Denomination100	NUM	10	42	51	Number of counterfeit currency notes of Rs. 100/- each
7.	Denomination50	NUM	10	52	61	Number of counterfeit currency notes of Rs. 50/- each
8.	Denomination20	NUM	10	62	71	Number of counterfeit currency notes of Rs. 20/- each
9.	Denomination10	NUM	10	72	81	Number of counterfeit currency notes of Rs. 10/- each
10.	Denomination5	NUM	10	82	91	Number of counterfeit currency notes of Rs. 5/- each
11.	Total Counterfeit Currency	NUM	10	92	101	Value of counterfeit currency detected. This value should match with the value derived from the number of notes mentioned in S. No. 4 to 10 above.
12.	Tendering Date	NUM	8	102	109	Date of tendering counterfeit currency in YYYYMMDD format, if available.  E.g.: 2 <sup>nd</sup> May 2007 should be written as 20070502
13.	Total Cash Tendered	NUM	20	110	129	Total Cash tendered by the tenderer including the counterfeit currency, if available
14.	Detection Date*	NUM	8	130	137	In YYYYMMDD format E.g.: 2 <sup>nd</sup> May 2007 should be written as 20070502
15.	Detected At*	CHAR	1	138	138	"A"- Cash Counter "B"- Branch Level "C"- Currency Chest "D"- RBI's CVPS "Z"- Other



16.	Police Informed	CHAR	1	139	13 9	Y – for Yes, N – for No
17.	FIR Detail	CHAR	80	140	21 9	FIR, Police Station details etc., if available
18.	Additional Information	CHAR	80	220	29 9	Additional Information such as quality of counterfeit currency, sequence of events, if available
19.	Name of Tendering Person	CHAR	80	300	37 9	Person who tendered the counterfeit currency, if available.
20.	Name of Account Holder	CHAR	80	380	45 9	Name of the Sole/First account holder in whose account the counterfeit currency was tendered, if available.
21.	Account Number	CHAR	20	460	47 9	Account/Card Number of the person in whose account the counterfeit currency was tendered, if available.

**An Indicative List of Suspicious Activities Transactions Involving Large Amounts of Cash**

Company transactions, that are denominated by unusually large amounts of cash, rather than normally associated with the normal commercial operations of the company, e.g. cheques,

**Transactions that do not make Economic Sense**

Transactions in which assets are withdrawn immediately after being deposited unless the business activities of the customer's furnishes a plausible reason for immediate withdrawal.

**Activities not consistent with the Customer's Business**

Accounts with large volume of credits whereas the nature of business does not justify such credits.

**Attempts to avoid Reporting/Record-keeping Requirements**

(i) A customer who is reluctant to provide information needed for a mandatory report, to have the report filed or to proceed with a transaction after being informed that the report must be filed.

(ii) Any individual or group that coerces/induces or attempts to coerce/induce a NBFC employee not to file any reports or any other forms.

(iii) An account where there are several cash transactions below a specified threshold level to avoid filing of reports that may be necessary in case of transactions above the threshold level, as the customer intentionally splits the transaction into smaller amounts for the purpose of avoiding the threshold limit.

**Unusual Activities**

Funds coming from the countries/centers which are known for money laundering.

### **Customer who provides Insufficient or Suspicious Information**

(i) A customer/company who is reluctant to provide complete information regarding the purpose of the business, prior business relationships, officers or directors, or its locations.

(ii) A customer/company who is reluctant to reveal details about its activities or to provide financial statements.

(iii) A customer who has no record of past or present employment but makes frequent large transactions.

### **Certain NBFC Employees arousing Suspicion**

(i) An employee whose lavish lifestyle cannot be supported by his or her salary.

(ii) Negligence of employees/willful blindness is reported repeatedly.

### **Some examples of suspicious activities/transactions to be monitored by the operating staff-**

- Large Cash Transactions
- Multiple accounts under the same name
- Placing funds in term Deposits and using them as security for more loans
- Sudden surge in activity level
- Same funds being moved repeatedly among several accounts