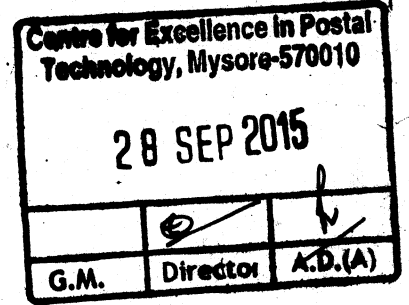


NO.- 02474.

No. 16-01/2013-Inspn.(Pt-II)
Government of India
Ministry of Communications & IT
Department of Posts
(Inspection Unit)
Dak Bhavan, Sansad Marg,
New Delhi, Dated 27/09/2015



To,

1. All Heads of Postal Circles.
2. All Postmasters General.
3. All Directors, Postal Training Centres.
4. Director, RAKNPA, Ghaziabad.
5. Army Postal Directorate.

**Subject: Supplementary Inspection Questionnaire for AML/CFT in r/o BO, SO, HO,
DO, RO & CO.**

Sir/Madam,

Inspection Division in consultation with PMLA/CFT Division have developed a set of Supplementary Inspection Questionnaire pertaining to AML/CFT guidelines for the inspection of following offices:-

1. Supplementary Inspection Questionnaire for Branch Office
2. Supplementary Inspection Questionnaire for Sub Office
3. Supplementary Inspection Questionnaire for Head Office
4. Supplementary Inspection Questionnaire for Divisional Office
5. Supplementary Inspection Questionnaire for Regional Office
6. Supplementary Inspection Questionnaire for Circle Office

2. The copy of the Supplementary Inspection Questionnaire for implementation of AML/CFT guidelines is enclosed.

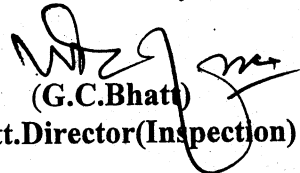
3. Circles are requested to circulate the Supplementary Inspection Questionnaire to its subordinate units for using the same while inspecting the respective offices.

4. Receipt of this letter may be acknowledged.

5. This issues with the approval of Member (PLI) Postal Services Board.

Enclosure:- **Supplementary Inspection Questionnaire.**

Yours faithfully,


(G.C.Bhatt)
Asstt. Director (Inspection)

Copy to:-

1. PPS to Secretary (Posts).
2. PPS to All Members, Postal Services Board.
3. DDG/PCO(PMLA), Dak Bhavan New Delhi-110001.
4. Shri Ravi Babu, Director, CEPT Mysore to upload the above questionnaires on the website for information to all concerned.
5. File No. 16-01/2012-Inspn. & 5. 16-02/2014-Inspn.

*Supplementary Inspection
Questionnaire for Prevention of
Money laundering And
Combating Financing of
Terrorism*

Department of Posts Dak Bhawan

Supplementary Inspection Questionnaire

for

Prevention of Money laundering

And

Combating Financing of Terrorism

Department of Posts

Inspection of BC

Inspection Questionnaire for BO

- 1. Check with the Branch Post master and other staff, if any, if they are aware of Money Laundering/Financing of Terrorism and their relation with financial services offered by the department.***
- 2. If no, then explain in detail.***

3. Postal Life Insurance:

- (1) Has the Circle/Region offices revised the PLI/RPLI proposal forms having KYC norms into use? Are the revised proposal forms available?***
- (2) Check some proposals forms (all for high value policies i.e. above 20 lakhs) to ensure that all entries regarding financial underwriting are complete?***
- (3) Has documentary support in respect of identity, address and PAN number been provided and checked before accepting proposal - text check 5 cases.***

4. iMO:

- (1) Whether all necessary up-to-date operational guidelines/ Circulars on AML/KYC/CFT are available .***
- (2) Whether all instances of single customer booking iMOs for a large number of payees of one payee receiving money from a large number of senders are being promptly reported as per the (STR) Suspicious Transaction.***

- (3) *Whether KYC norms are adhered to for iMO payment and proper procedure is followed at the time of bookings/process of payment?*
- (4) *Whether money order above Rs. 5000/- to be sent by the member of public has been booked under iMO?*
- (5) *Whether the amount exceeds Rs.50, 000 within a month in case of any particular customer for booking/payment. In such a case whether Customer Due Diligence (CDD) is conducted? Whether the Post office obtains satisfactory evidence and properly establishes in records, the identity and legal existence of any person doing any kind of business with it.*
- (6) *Whether Customer Due Diligence (CDD) is being exercised in booking / payment.*
- (7) *Whether a customer profile has been prepared for all regular customers.*
- (8) *Whether genuineness of payee is ascertained in case of doubt.*
- (9) *Check if in some cases transactions are abandoned / aborted by customers on being asked to give some details or to provide documents. The BPM should be properly guided to ensure that all such attempted transactions should also be reported like STRs irrespective of the amount of the transaction and even if the transaction is not completed by the customer.*
- (10) *Check if details of the customers, along with transaction details have been reported as suspicious transaction where any customer is found doing deliberate splitting of amount to avoid reporting of cash transactions.*

Other (General)

1. *Whether the all staff has been trained.*
2. *Whether there is an unusual upsurge in transaction / value of a particular POSB account.*

Inspection of SO

Inspection Questionnaire for SO

1. General:

- (i) Check if there is a general awareness about anti money laundering and CFT provisions and its significance for the post office.*
- (ii) If no, then please explain in detail.*
- (iii) Are specific literature/ pamphlets/signboard for educating the customer on the objectives of KYC programme /requirement prepared and put on display for the benefit of the customers?*
- (iv) Whether all staff managing WUMTs/POSB/MO counters have been trained.*
- (v) What is the compliance level of the post office towards AML/CFT implementation?*
- (vi) Whether National Savings Institute team has visited / inspected the post office / post offices in the Circle / Regions /Division. What action has been taken on the visit report?*
- (vii) Whether any audit team from WUMT or Money Gram had visited and communicated any observation/concern. What corrective action was taken thereon.*
- (viii) Whether local authorities have contacted the postal division/region/circle with regard to any general or specific threat of Money Laundering or FTA in the area or in the post office(s)*
- (ix) Whether the office/or any office in the jurisdiction has already has a case of AML/CFT violation. What is the follow up action and safeguards adopted?*
- (x) Whether there is an unusual upsurge in transaction / value of a particular POSB/remittance service, whether customer predominantly relates to a particular area.*

- (xi) *Whether enough due diligence is being exercised in case of foreign nationals. Is the staff aware of Politically Exposed Persons, and provisions in this regard.*
- (xii) *What is the cheque issuing compliance of the post office, as per the PMLA provisions.*
- (xiii) *Whether the post office is able to detect any unusual or suspicious transaction in the Branch Offices in its account. Check from the account details and vouchers received from the BO whether cheque payment are being made as per the AML guidelines.*

2. PLI

- (i) *Has the Circle/Region offices revised the PLI/RPLI proposal forms having KYC norms into use?*
- (ii) *Have all the PLI/RPLI proposals accepting authorities been instructed about financial underwriting norms?*
- (iii) *Check all proposals forms for high value policies (above 20 lakhs) to ensure that all entries regarding financial underwriting are complete?*
- (iv) *Has documentary support in respect of identity, address and PAN number been provided and checked before accepting proposal - text check 5 cases.*

3. Questionnaire for International Money Transfer Service (IMTS)

- (i) *Whether all necessary up-to-date operational guidelines/ Circulars on L/KYC/ for Money Transfer Service Scheme (MTSS) is available with the Post Office operative staff and are they conversant with the provisions of AML/CFT norms.*

- (ii) *Is a regular training/ refresher course being conducted by Circles for staff of the post office for the implementation of AML/KYC/CFT guidelines?*
- (iii) *Whether the compiled CTR/ STR for IMTS is being sent by the SO to HO on time? If not, reasons thereof.*
- (iv) *Check if a profile (a separate sheet in a register) for each new customer is being prepared and maintained by the Post Office, based on risk categorization, containing information like nature of ID proof, number, date and office of issue of the ID proof, social and financial status. And customer identification data is also being updated by the Post Master periodically if there is any continuing relationship.*
- (v) *Check if the staff on the counter has a reliable and good service record. Check if the remittances are paid on the counter itself and not through either postmen or other messengers.*
- (vi) *Is there a proper system put in place for proper maintenance and preservation of transaction records? Is this data retrievable easily and quickly whenever requested by competent authorities?*
- (vii) *Whether all documents/ office records/ memoranda pertaining to complex, unusual large transactions and all unusual patterns of transactions and purpose thereof are properly recorded and examined? Is a system put into place for preserving these records for a period of 5 years?*

- (viii) Check few cases and see if proof of payments along with KYC documents are being kept properly.*
- (ix) Check a few cases to see if proper CDD (Customer Due Diligence) and EDD (Extra Due Diligence) activities as prescribed in the IMTS AML/ CFT/ KYC norms issued by the Department in respect of number of maximum yearly transactions, cash transactions limit, cheque transactions, foreign recipient transactions, non-familiar remitter- receiver transaction cases etc. are being duly monitored.*
- (x) Check a few cases and find out if the staff has been able to properly fill up the TRM form. Also check whether address proof has been properly collected even if PAN card was collected as ID proof. Check if documents, including copy of the cheque were also self attested by the customer. Check if ID proof is a valid one instead of ration cards etc.*
- (xi) Check whether negative list of sender countries under WMTS/MoneyGram are available in the post offices.*
- (xii) Check if in some cases transactions are abandoned / aborted by customers on being asked to give some details or to provide documents. All such attempted transactions should also be reported like STRs irrespective of the amount of the transaction and even if the transaction is not completed by the customer.*
- (xiii) Check if details of the customers along with transaction details are reported as suspicious transaction where any customer is*

found doing deliberate splitting of amount to avoid reporting of cash transactions.

4. **Questionnaire for Moneygram** : PI check a few transactions to see the following:

1. relation between the sender and receiver and purpose of transactions in all cases and document the exact information in the receive form .
2. Whether originals of Photo Id and Address proof have been verified and validity checked.
3. Whether a copy of the original Receive Form, Photo ID and Address proof have been received for record . whether correct and complete details of the receiver was captured in the address and phone number provided by the receiver is valid.
4. Whether passport copy and valid visa from Foreign Tourists receiving remittance in India were collected. Ask if the signature of recipient is made on the spot, at the counter, and whether it is tallied with the signature on KYC document.
5. Whether customers have been collecting money from different city than is mentioned on the photo id.

5. (a) **Questionnaire related to IMO operations**

- (i) If the Post Office is internet enabled, whether IMO service is activated; if not, the reason(s) thereof?
- (ii) How many iMOs have been booked in the Post Office?

- (iii) *Number of iMOs booked and paid to be checked from application reports and vouchers/slips.*
- (iv) *Whether location of iMO is provided suitably for public convenience?*
- (v) *Whether publicity material relating to iMO service is visible in Post Office premises?*
- (vi) *Whether regular training is conducted to operator/supervisor for smooth functioning of iMO software?*
- (vii) *Whether any marketing activity to popularize iMO service among the public has been conducted by P.O.?*
- (viii) *Whether tariff of the iMO has been displayed prominently in the public hall for information of public?*
- (ix) *Whether staff is aware of Circle-Coordinator details in case of any application related query/error.*

5.(b) Questionnaire related to AML/CFT compliance in case of iMO

- (i) *Whether all necessary up-to-date operational guidelines/ Circulars on AML/KYC/CFT are available at the Post Office counter.*
- (ii) *Whether all instances of single customer booking iMOs for a large number of payees of one payee receiving money from a large number of senders are being promptly reported as per the (STR) Suspicious Transaction.*

- (iii) *Whether KYC norms are adhered to for iMO payment and proper procedure is followed at the time of bookings/process of payment?*
- (iv) *Whether money order above Rs. 5000/- to be sent by the member of public has been booked under iMO?*
- (v) *Whether the amount exceeds Rs.50, 000 within a month in case of any particular customer for booking/payment. In such a case whether Customer Due Diligence (CDD) is conducted? Whether each Post office obtains satisfactory evidence and properly establishes in records, the identity and legal existence of any person doing any kind of business with it.*
- (vi) *Whether Customer Due Diligence (CDD) is being exercised in booking / payment.*
- (vii) *Whether a customer profile has been prepared for all regular customers.*
- (viii) *Whether the genuineness of payee is ascertained in case of doubt.*

Inspection of

HC

Inspection Questionnaire for HO

1. General:

- (i) Check if there is a general awareness about anti money laundering and CFT provisions and its significance for the post office.**
- (ii) If no, then please explain in detail.**
- (iii) Are specific literature/ pamphlets/signboard for educating the customer on the objectives of KYC programme /requirement prepared and put on display for the benefit of the customers?**
- (iv) Whether all staff managing WUMTs/POSB/MO counters have been trained.**
- (v) What is the compliance level of the post office towards AML/CFT implementation?**
- (vi) Whether National Savings Institute team has visited / inspected the post office. What action has been taken on the visit report?**
- (vii) Whether any audit team from WUMT or Money Gram had visited and communicated any observation/concern. Whether any risk categorization of the post office has been done by the visiting team, reason thereof? What corrective action was taken thereon.**
- (viii) Whether local authorities have contacted the postal division/region/circle with regard to any general or specific threat of Money Laundering or FTA in the area or in the post office(s)**
- (ix) Whether the office already has a case of AML/CFT violation. What is the follow up action and safeguards adopted?**
- (x) Whether there is an unusual upsurge in transaction / value of a particular POSB/remittance service, whether customer predominantly relates to a particular area.**

- (xi) *Whether enough due diligence is being exercised in case of foreign nationals. Is the staff aware of Politically Exposed Persons, and provisions in this regard.*
- (xii) *What is the cheque issuing compliance of the post office, as per the PMLA provisions?*
- (xiii) *Whether the post office is able to detect any unusual or suspicious transaction in the Branch Offices/sub Offices in its account. Check from the account details and vouchers received from the BO/SO whether cheque payment are being made as per the AML guidelines.*

2. PLI

- (i) *Has the Circle/Region offices revised the PLI/RPLI proposal forms having KYC norms into use?*
- (ii) *Have all the PLI/RPLI proposals accepting authorities been instructed about financial underwriting norms?*
- (iii) *Check all proposals forms for high value policies (above 20 lakhs) to ensure that all entries regarding financial underwriting are complete?*
- (iv) *Has documentary support in respect of identity, address and PAN number been provided and checked before accepting proposal - text check 5 cases.*

3. Questionnaire for International Money Transfer Service (IMTS)

- (i) *Whether all necessary up-to-date operational guidelines/ Circulars on L/KYC/ for Money Transfer Service Scheme (MTSS) is available with the Post Office operative staff and are they conversant with the provisions of AML/CFT norms.*
- (ii) *Are regular training/ refresher course being conducted by Circles for staff of the post office for the implementation of AML/KYC/CFT guidelines?*

- (iii) *Whether the compiled CTR/ STR for IMTS is being sent by the HO to DO on time? If not, reasons thereof.*
- (iv) *Check if a profile (a separate sheet in a register) for each new customer is being prepared and maintained by the Post Office, based on risk categorization, containing information like nature of ID proof, number, date and office of issue of the ID proof, social and financial status. And customer identification data is also being updated by the Post Master periodically if there is any continuing relationship.*
- (v) *Check if the staff on the counter has a reliable and good service record. Check if the remittances are paid on the counter itself and not through either postmen or other messengers.*
- (vi) *Is there a proper system put in place for proper maintenance and preservation of transaction records? Is this data retrievable easily and quickly whenever requested by competent authorities?*
- (vii) *Whether all documents/ office records/ memoranda pertaining to complex, unusual large transactions and all unusual patterns of transactions and purpose thereof are properly recorded and examined? Is a system put into place for preserving these records for a period of 5 years?*
- (viii) *Check a few cases and see if proof of payments along with KYC documents are being kept properly.*
- (ix) *Check a few cases to see if proper CDD (Customer Due Diligence) and EDD (Extra Due Diligence) activities as prescribed in the IMTS AML/ CFT/ KYC norms issued by the Department in respect of number of maximum yearly transactions, cash transactions limit, cheque transactions, foreign recipient transactions, non-familiar remitter- receiver transaction cases etc. are being duly monitored.*
- (x) *Check a few cases and find out if the staff has been able to properly fill up the TRM form. Also check whether address proof has been properly collected even if PAN card was collected as ID proof. Check if documents, including copy of the cheque were also self attested by*

the customer. Check if ID proof is a valid one instead of ration cards etc.

(xi) Check whether negative list of sender countries under WMTS/MoneyGram are available in the post offices.

(xiv) Check if in some cases transactions are abandoned / aborted by customers on being asked to give some details or to provide documents. All such attempted transactions should also be reported like STRs irrespective of the amount of the transaction and even if the transaction is not completed by the customer. Check if details of the customers along with transaction details are reported as suspicious transaction where any customer is found doing deliberate splitting of amount to avoid reporting of cash transactions.

4. **Questionnaire for Moneygram** : PI check a few transactions to see the following:

- (i) Relation between the sender and receiver and purpose of transactions in all cases and document the exact information in the receive form .
- (ii) Whether originals of Photo Id and Address proof have been verified and validity checked.
- (iii) Whether a copy of the original Receive Form, Photo ID and Address proof have been received for record . whether correct and complete details of the receiver was captured in the address and phone number provided by the receiver is valid.
- (iv) Whether passport copy and valid visa from Foreign Tourists receiving remittance in India were collected. Ask if the signature of recipient is made on the spot, at the counter, and whether it is tallied with the signature on KYC document.
- (v) Whether customers have been collecting money from different city than is mentioned on the photo id.

5. A. Questionnaire related to iMO operations (not related to AML/CFT)

- (i) If the Head Office is internet enabled, whether iMO service is activated; if not, the reason(s) thereof?*
- (ii) How many iMOs have been booked in the Head Office?*
- (iii) Number of iMOs booked and paid to be checked from application reports and vouchers/slips.*
- (iv) Whether location of iMO is provided suitably for public convenience?*
- (v) Whether publicity material relating to iMO service is visible in HO premises?*
- (vi) Whether regular training is conducted to operator/supervisor for smooth functioning of iMO software?*
- (vii) Whether any marketing activity to popularize iMO service among the public has been conducted by H.O.?*
- (viii) Whether tariff of the iMO has been displayed prominently in the public hall for information of public?*
- (ix) Whether staff is aware of Circle-Coordinator details in case of any application related query/error.*

5.B Questionnaire related to AML/CFT compliance In case of IMO

- (i) Whether all necessary up-to-date operational guidelines/ Circulars on AML/KYC/CFT are available at the counter.*
- (ii) Whether all instances of single customer booking iMOs for a large number of payees of one payee receiving money from a large number of senders are being promptly reported as per the (STR) Suspicious Transaction.*
- (iii) Whether KYC norms are adhered to for iMO payment and proper procedure is followed at the time of bookings/process of payment?*
- (iv) Whether money order above Rs. 5000/- to be sent by the member of public has been booked under iMO?*
- (v) Whether the amount exceeds Rs.50, 000 within a month in case of any particular customer for booking/payment. In such a case whether Customer Due Diligence (CDD) is conducted? Whether each Post office obtains satisfactory evidence and properly establishes in records, the identity and legal existence of any person doing any kind of business with it.*
- (vi) Whether Customer Due Diligence (CDD) is being exercised in booking / payment.*
- (vii) Whether a customer profile has been prepared for all regular customers.*
- (viii) Whether the genuineness of payee is ascertained in case of doubt.*

Inspection of DC

Inspection of Divisional Office

1. ***Check if there is a general awareness among the officers about anti money laundering and CFT provisions and its significance for the post office. If no, then please explain in detail.***
2. ***See if the divisional officers are aware of their role as a divisional compliance cell as per the compliance structure created by the directorate under Prevention of Money Laundering Act 2002.***
3. ***Are specific literature/ pamphlets/signboard for educating the customer on the objectives of KYC programme /requirement prepared and supplied to post offices?***
4. ***Whether all staff managing WUMTs/POSB/MO counters have been got trained on AML/CFT guidelines including CTR/STR etc. See the training program of the division.***
5. ***Whether National Savings Institute team has visited / inspected the post office / post offices in the Division. What action has been taken on the visit report?***
6. ***Whether any audit team from WUMT or Money Gram had visited any post office/s in the division and communicated any observation/concern. Whether any risk category has been labeled on any post office. Reasons thereof. What corrective action was taken thereon.***
7. ***Whether local authorities have contacted the postal division with regard to any general or specific threat of Money Laundering or FTA in the area or in the post office(s).***
8. ***How is the division ensuring that the KYC/CDD norms are being strictly followed without exception?***
9. ***Whether any office in the jurisdiction has already has a case of AML/CFT violation. What is the follow up action and safeguards adopted?***

10. Check the inspection schedule and see if inspections are being taken up by divisional and sub divisional officers adequately and see if AML/CFT questions are being addressed during inspections and visits. What is the compliance level of the post offices inspected/visited in the last one year or any specified period towards AML/CFT implementation?
11. Has the Circle/Region offices revised the PLI/RPLI proposal forms having KYC norms into use?
12. Have all the PLI/RPLI proposals accepting authorities been instructed about financial underwriting norms?
13. Whether the compiled CTR/ STR for all financial services is being sent by the HO to DO on time? If not, what has the DO done to ensure timely submission of reports by the post offices under its jurisdiction? Heck a few STR/CTR reports and see if there is a proper reporting of Cash/suspicious transactions. See if any corrective action was taken by the Division whenever required.
14. Check if the Divisional office is aware that remittances are being paid through the counter itself and not through either postmen or other messengers.
15. Is there a proper system prescribed by the division for proper maintenance and preservation of transaction records? Is this data retrievable easily and quickly whenever requested by competent authorities?
16. Whether all documents/ office records/ memoranda pertaining to complex, unusual large transactions and all unusual patterns of transactions and purpose thereof are properly recorded and examined? Is a system put into place for preserving these records for a period of 5 years?
17. Check if there is strict compliance to the requirement of payment by cheque over a certain prescribed amount.
18. See if the divisional officers, e.g. ASPs, IPOs, DSP/SSPs can be further groomed as training resource person for the region/circle.

Inspection of

RO

Inspection of Regional Office

1. Check if there is a general awareness among the officers about **anti money laundering and CFT provisions** and its significance for the department of post.
2. If no, then please explain on the spot in detail.
3. Check if all the Circulars issued by the directorate from time to time on the **AML/CFT issues** are available in the regional office.
4. How is the region ensuring that the **KYC/CDD norms** are being strictly followed without exception in all the post offices for all the financial services.
5. See if the concerned Director/AD/APMG in the RO are aware of their role as a regional compliance cell officers as per the compliance structure created by the directorate under **Prevention of Money Laundering Act 2002**.
6. Are specific literature/ pamphlets/signboard for educating the customer on the objectives of **KYC program /requirement** prepared regionally and supplied to divisions, or instructions to divisions with requisite funds?
7. Check the training calendar/workshop schedule. Is there an arrangement to send officers regularly to the regional **PTCs/RAKNPA** where **AML/CFT** training programs are running or are planned? Is a training database being maintained in the office. How many training/workshop sessions on **AML/CFT** were organized by the region in the last one year? Whether a training team/resource personnel developed in the regional office. Check if training material / literature are available.
8. Whether **National Savings Institute** team has visited / inspected the post office / post offices in the region. Whether compliance of divisions ensured on the visit/inspection reports?
9. Whether any audit team from **WUMT** or **Money Gram** had visited in the post offices in the region and communicated any observations/concerns.

Whether any risk category has been assigned to any post office. What are the reasons? What corrective action was taken thereon?

- 10. Whether local/state authorities/enforcement Directorate/economic Offence Wing/Home Ministry/State Police etc. have contacted the regional office with regard to any general or specific threat/instances of Money Laundering or Financing of Terrorist Activities in the area or in the post office(s).*
- 11. Whether any office in the jurisdiction has already has a case of AML/CFT violation. What is the follow up action and safeguards adopted?*
- 12. Check the inspection calendar and a few IRs and see if inspections are being taken up by regional, divisional and sub divisional officers adequately and see if AML/CFT questions are being addressed during inspections and visits. What is the compliance level of the post offices inspected/visited in the last one year or any specified period towards AML/CFT implementation?*
- 13. Check if the monthly and quarterly reports on AML/CFT as prescribed by the directorate is being sent on time. See the statement of AML/CFT Compliant offices and check what steps were taken by the region to improve the compliance profile.*
- 14. Has the Circle/Region offices revised the PLI/RPLI proposal forms having KYC norms into use?*
- 15. Have all the PLI/RPLI proposals accepting authorities been instructed about financial underwriting norms?*
- 16. Whether the compiled CTR/ STR for all financial services is being sent by the DO to RO on time? If not, what has the DO/RO done to ensure timely submission of reports by the post offices and Divisional offices under its jurisdiction? Check a few STR/CTR reports and see if there is a proper reporting of Cash/suspicious transactions. See if any corrective action was taken by the Division/Region whenever required.*
- 17. Is there a proper system prescribed by the region for proper maintenance and preservation of transaction records? Is this data retrievable easily and quickly whenever requested by competent authorities?*
- 18. Check if there is strict compliance to the requirement of payment by cheque over a certain prescribed amount in all the post offices in the region.*

Inspection of CO

Inspection of Circle Office

1. *Check if there is a general awareness among the officers about anti money laundering and CFT provisions and its significance for the department of post.*
2. *If no, then please explain on the spot in detail.*
3. *Check if all the Circulars issued by the directorate from time to time on the AML/CFT issues are available in the office and have been circulated to other formations in the circle in time.*
4. *See if the concerned /PMG/Directors/ADs/APMG in the CO are aware of their role as a Circle Compliance Cell Officers as per the compliance structure created by the directorate under **Prevention of Money Laundering Act 2002**.*
5. *Check the training calendar/workshop schedule. Is there an arrangement to send officers regularly to the regional PTCs/RAKNPA where AML/CFT training programs are running or are planned? Is a training database being maintained in the office. How many training/workshop sessions on AML/CFT were organized by the circle in the last one year? Whether a training team/resource personnel developed in the regional office. Check if training material / literature are available or has been developed by the circle.*
6. *Whether **National Savings Institute** team has visited / inspected the post office / post offices in the circle. What are their observations and concerns. Whether compliance of divisions/regions ensured on the visit/inspection reports?*
7. *How is the circle ensuring that the KYC/CDD norms are being strictly followed without exception?*
8. *Whether any audit team from WUMT or Money Gram had visited in the post offices in the region and communicated any observations/concerns.*

Whether any risk category has been assigned to any post office in the circle. What are the reasons? What corrective action was taken thereon?

9. Whether local/state authorities/enforcement Directorate/Economic Offence Wing/Home Ministry/State Police etc. have contacted the Circle office or any office in the circle with regard to any general or specific threat/instances of Money Laundering or Financing of Terrorist Activities in the area or in the post office(s).

10. Whether any office in the jurisdiction has already has a case of AML/CFT violation. What is the follow up action and safeguards adopted?

11. Check the inspection calendar and a few IRs and see if inspections are being taken up by circle/regional, divisional and sub divisional officers adequately and see if AML/CFT questions are being addressed during inspections and visits. What is the compliance level of the post offices inspected/visited in the last one year or any specified period towards AML/CFT implementation?

12. Check if the monthly and quarterly reports on AML/CFT as prescribed by the directorate is being sent on time. See the statement of AML/CFT Compliant offices and check what steps were taken by the circle to improve the compliance profile.

13. Has the Circle/Region offices revised the PLI/RPLI proposal forms having KYC norms into use?

14. Have all the PLI/RPLI proposals accepting authorities been instructed about financial underwriting norms?

15. Whether the compiled CTR/ STR for all financial services is being sent by the RO to CO on time? If not, what has been done to ensure timely submission of reports by the post offices and Divisional offices and ROs under its jurisdiction? Check a few STR/CTR reports and see if there is a proper reporting of Cash/suspicious transactions. See if any corrective action was taken by circle whenever required.

16. Is there a proper system prescribed by the circle for proper maintenance and preservation of transaction records? Is this data retrievable easily and quickly whenever requested by competent authorities?

17. Check if there is strict compliance to the requirement of payment by cheque over a certain prescribed amount in all the post offices in the region.

18. What is status of compliance to the circulars, queries and reminders from the directorate on the AML/CFT issues. Test-check a few cases.

