



Circular No.: PFRDA/2023/16/Sup-PoP/02 29 May 2023

To

Point of Presence (PoPs) performing activities of NPS-Lite (PoPs-NPS-Lite)

#### **Subject: Audit of Points of Presence performing activities of NPS-Lite (PoPs-NPS-Lite)**

- 1. PoPs registered under Regulation 3(1)(iv) of Pension Fund Regulatory and Development Authority (Points of Presence) Regulations, 2018 and amendment thereof and performing activities of NPS-Lite (PoPs-NPS-Lite) shall ensure that the annual accounts and processes maintained under NPS-Lite are audited on annual basis by an independent external chartered accountant/audit firm, as per the provisions of Operational Guidelines issued vide Circular dated 16<sup>th</sup> March 2022 under PFRDA (PoP) Regulations, 2018 and amendment thereof. The eligibility norms for appointment of auditor by PoP is prescribed at **Annexure 1.**
- 2. The scope of such audit shall cover, inter-alia, the existence, scope, adequacy and efficacy of internal control system, procedures and safeguards, compliance with the provisions of the Pension Fund Regulatory and Development Authority Act, 2013, Pension Fund Regulatory and Development Authority (Points of Presence) Regulations, 2018 and amendment thereof and Guidelines/ Circulars/Notifications issued by the Authority, KYC requirements as per PMLA Act/Rules and data security in respect of the operations of such Point of Presence. The Broad Scope of Audit is listed at **Annexure 2**.
- 3. PoPs must maintain the books of accounts and records including electronic records and documents as stipulated in the Regulations/Guidelines/Circulars/Notifications issued by the Authority from time to time.
- 4. The Audit Report format along with Instructions is placed at **Annexure 3**. PoPs-NPS-Lite shall submit the audit report to PFRDA within 3 months from the date of closure of the accounts and the first such audit report shall be for the period April 1, 2022 to March 31, 2023. Further, for the FY 2022-23, PoPs-NPS-Lite shall submit the audit report to PFRDA within 3 months from the date of issuance of this Circular.
- 5. The audit reports shall be reviewed by the Authority and appropriate course of action would be pursued in cases where reports are not as per the requirements.
- 6. PoPs-NPS-Lite are advised to ensure compliance with the above.

**General Manager** 



#### ELIGIBILITY NORMS FOR SELECTION OF AUDITOR

- 1. PoPs-NPS-lite shall appoint the external auditor as per the list of auditors empaneled by any of the Financial Sector Regulator (FSRs) including PFRDA to conduct the audit for activities related to NPS-Lite. Further, the central/state government department/entities shall conduct the audit through the internal audit department or through the external auditor as per the list of auditors empaneled by any of the FSRs including PFRDA.
- 2. PoPs shall appoint the Auditor as per the eligibility criteria prescribed by the PFRDA, with the approval of the Audit Committee or the Board, wherever the Audit Committee is not present.
- 3. PoPs who are non-listed Government entities may engage the internal audit department or appoint Auditor as per the eligibility criteria prescribed by the PFRDA with the approval of Competent Authority.
- 4. Auditors shall be appointed for a tenure of three years.
- 5. Auditors will have a cooling period of two years in respect of the same POP. After completion of tenure of three years, audit entity should not accept any audit assignment of that POP during the next two years.

#### SCOPE OF WORK OF AUDIT

# NATIONAL PENSION SYSTEM – LITE (NPS-LITE)

Auditor appointed by the PoP shall conduct the Audit of the PoP for activities related to NPS-Lite. The Broad Scope of Work of Auditor is as under:

- i. Collection and processing of initial contribution and subsequent contribution received from the subscribers.
- ii. Compliance of KYC/AML/CFT guidelines issued by PFRDA by the PoP w.e.f 23rd February 2023
- iii. Uploading of Subscriber Contribution File (SCF) in CRA System and Transfer of Fund to Trustee Bank.
- iv. Maintenance of collection account by the PoP in accordance with provisions of PFRDA(PoP) Regulations 2018 and guidelines issued there under.
- v. Reconciliation of subscriber's contribution received by the PoP in the collection account and maintainace of audit trail for the same.
- vi. Subscriber grievance handling by the POPs as prescribed under Subscriber Grievance Regulations, 2015 and circulars issued there under.
- vii. Receiving and processing service requests such as change in subscriber details, address, PFM and Pension Fund Change, Intersector shifting etc. received from the subscribers in CRA system.
- viii. Receiving and processing of subscriber withdrawal/exit request with laid down in CRA system.
- ix. Adherence to the timeframe laid down under the guidelines issued by PFRDA.
- x. Payment of compensation by PoP for delayed activities as per laid down in extant Regulations and guidelines.
- xi. Verification of supporting documents, in case of delays, due to technical reasons/beyond the control of PoP and wherever PoP has not paid the compensation.
- xii. Charges collected by the PoPs and to check the limits, mode and manner of collection as laid down by PFRDA.
- xiii. Maintenance of Books of Accounts by the PoPs.
- xiv. Verification of MIS/ Compliance submitted by PoPs to PFRDA.
- xv. Compliance with the circulars/ guidelines/ notifications issued by PFRDA and/ or any other Statutes
- xvi. Appointment and discharge of responsibilities of Compliance Officer and Principle Officer
- xvii. Any other activity in relation to the above.

*Note: The scope as specified above is only indicative and not exhaustive* 

#### FORMAT OF AUDIT REPORT

(To be furnished on the letter head of the Audit Firm)

## **CERTIFICATE FOR AUDIT**

We have examined the relevant books of accounts, records and documents maintained by
M/s, (name of the Point of Presence (PoP))
bearing Pension Fund Regulatory and Development Authority (PFRDA) Registration Number under NPS-Lite and to fulfill the audit requirement, as prescribed by
Pension Fund Regulatory and Development Authority (Points of Presence) Regulations, 2018 and
Guidelines issued there under, for the financial year
The purpose of this audit is to examine that the processes, procedures followed and the operations carried out by the Point of Presence (including the operations by its facilitators/Banking Correspondents/any other service provider approved by the Authority) are as per the applicable Acts,
Rules, Regulations, By-laws prescribed by the Authority and Guidelines, Circulars, Notifications etc.
issued thereunder

We have obtained all the information and explanations, and examined the relevant books which to the best of our knowledge and belief, were necessary for the purpose of this Audit. In our opinion, proper books of accounts, records and documents, as per the regulatory requirement **have/have not** been maintained by the PoP-NPS-Lite. (*Strike whichever not applicable*)

Based on examination of the processes, procedures followed and the operations carried out by the Point of Presence, to the best of our knowledge and belief and according to the information and explanations given to us, we certify that the Point of Presence **has/does not have** adequate internal control for ensuring orderly and efficient conduct of its business, including adherence to Acts, Rules, Regulations, By-laws prescribed by the Authority and Guidelines, Circulars, Notifications etc. issued thereunder, safeguarding the subscribers interest, prevention and detection of frauds and errors, accuracy and completeness of the books of accounts, records and documents. (*Strike whichever not applicable*)

We have conducted the audit within the framework provided by the Authority for the purpose of this internal Audit. To the best of our knowledge and belief and according to the information and explanations given to us, no material fraud/non-compliance/misrepresentation/violation by the Point of Presence **is/is not** observed during the course of this audit. (*Strike whichever not applicable*)

Based on the scrutiny of relevant books of accounts, records and documents, we certify that the Point of Presence **has/has not** complied with the relevant provisions of Pension Fund Regulatory and Development Authority Act, 2013, Pension Fund Regulatory and Development Authority (Points of Presence) Regulations, 2018 (Chapter IV, Regulations 23-28) and various circulars of the Authority. (*Strike whichever not applicable*)

We declare that we do not have any direct / indirect interest in or relationship with the Point of Presence or its shareholders / directors / partners / proprietors / management and also confirm that we do not perceive any conflict of interest in such relationship / interest while conducting audit of the said PoP-NPS-Lite.

In our opinion and to the best of our knowledge based on information provided and according to the explanations given to us by the management/compliance officer, the Report provided by us (along with Enclosure - 1 and Enclosure - 2) and subject to our observations, which covers the entire scope of the audit, is true and correct.

Name of Chartered Accountant along with seal & signature: Name of the Proprietor / Partner: Membership no. / CP. No.: UDIN No.: Date: Place:

# Format of Audit Report specifying the minimum scope to be covered

S. No.	Particulars	with?)	of auditor (In case of non- compliance observed)		Auditors Remarks against Management comments
	NPS -Lite subscriber registration documentation/PML aly applicable to Gramin Dak Sevaks registered by Depart			ey Launderin	g compliance
1.		Yes/No/NA	1		
2.	Whether forms (SRF) are Collected and Verified as per the prescribed KYC norms under PML Act/Rules and/or KYC/AML/CFT guidelines issued by the PFRDA?	Yes/No/NA			
3.	Whether PoP has issued the KYC/AML/CFT policy as prescribed under KYC/AML/CFT guidelines?	Yes/No/NA			
4.	Whether PoP have conducted customer due diligence, risk assessment and risk management measures in accordance with KYC/AML/CFT guidelines?	Yes/No/NA			
5.	Whether the physical SRF forms along with supporting documents are being submitted to the central recordkeeping agency (CRA) or its representative approved by the Authority or stored at PoP level (as the case may be)?	Yes/No/NA			
	NPS Lite subscriber servicing	I	T		
1.	Whether Migration to APY/ Shifting of Subscribers/ Change Requests of subscribers/other requests including change in address, bank account or any other subscriber request is carried out on receipt of written request along with documentary proof as mentioned in the operational guidelines and also processed as per the TATs prescribed under Schedule 2?	Yes/No/NA			
2.	Whether PoP has conducted the due-diligence during the processing of subscribers change request with respect to KYC details (Name, DoB, Address, Date of retirement, Mobile number and Bank account details)?	Yes/No/NA			

3.	Whether the acknowledgement physically/online has been	Yes/No/NA				
	vided to the subscriber(s)?					
<b>C.</b> 1	Dealing with subscriber funds				L	
1.	Whether internal controls are in place to identify the source	Yes/No/NA				
	of the funds received from the subscribers?					
2.	Whether the existing subscribers are approached by the	Yes/No/NA				
	POP for persistence?					
3.	Whether acknowledgement slip / receipt with unique	Yes/No/NA				
	number along with receipt date and stamp/signature is					
	provided to the subscriber for the contribution amount as					
	per the TATs prescribed under Operational Guidelines?					
4.	Whether all funds received from subscribers by the PoP	Yes/No/NA				
	under NPS Lite are being deposited to designated NPS Lite					
	collection account by the PoP/PoP-SP as prescribed under					
	Operational Guidelines?					
5.	Whether the contribution processing i.e. SCF upload and	Yes/No/NA				
	fund remittance are uploaded by the PoP as per the					
	prescribed TATs under Operational Guidelines					
6.	Whether funds collected through facilitators / any other	Yes/No/NA				
	channel approved by the Authority are being processed as					
	per the prescribed timelines?					
7.	Whether compensation is being paid by the PoP in case of	Yes/No/NA				
	all delayed transactions as per the rates prescribed under					
	the guidelines under Operational Guidelines?					
8.	Whether subscribers' funds are processed and remitted to	Yes/No/NA				
	Trustee Bank or refunded to subscriber?					
	In case, the funds are not being remitted to system despite					
	collection from subscriber without any justifiable reason,					
	such instances to be provided.					
9.	Whether any additional amount towards admin fee,	Yes/No/NA				
	processing fee etc. is charged by PoP / branches /					
	facilitators engaged by them from the subscriber?					
<b>D.</b> 1	NPS-Lite Subscriber grievance handling					
1.	Number of NPS Lite subscriber complaints/grievances	No. of pend	ing grievan	ces:		
	pending for more than 30 days at in CGMS at CRA portal					
	as on 31st March	Remarks (if	any):	T		
2.	Whether the directly received grievances in respect of NPS	Yes/No/NA				
	Lite by the PoPs are being lodged under the CGMS?					
3.	Whether all grievances in CGMS at CRA portal are being	Yes/No/NA				
	resolved within the time frame provided in Pension Fund					

	Regulatory and Development Authority (Redressal of				
	Subscriber Grievance) Regulations, 2015?				
4.	Whether designated email ID for NPS Lite subscriber	Yes/No/NA			
	grievance is created and informed to CRA and displayed				
	on the website of the PoP including the grievance redressal				
_	system?				
	Exit / withdrawal	<b>N</b> T 0			
1.	Number of pending exit/withdrawal requests f at the level	No. of pend	ling request	ts:	
	of the PoP as on 31st March	Domanka (i	f any).		
2.	Whether the exit/withdrawal requests are processed by the	Remarks (i Yes/No/NA	n any);	<u> </u>	
۷.	POP as per the TATs prescribed under Operational	1 CS/1NO/1NA			
	Guidelines?				
3.	Is it ensured that the exit/withdrawal requests are provided	Yes/No/NA			
٥.	by the subscribers/claimants in the format as prescribed by	103/110/11/1			
	the Authority and as per the KYC norms prescribed under				
	KYC/AML/CFT guidelines?				
4.	Whether the acknowledgement physically/online has been	Yes/No/NA			
	provided to the subscriber(s)?				
5.	Whether the signature of the subscriber is verified with the	Yes/No/NA			
	records for processing the exit / withdrawal requests?				
6.	Whether supporting documents (as prescribed by the	Yes/No/NA			
	Authority from time to time) are obtained from the				
	subscriber/claimant?				
7.	Whether the PoP sends physical exit / withdrawal forms to	Yes/No/NA			
	the CRA after authorizing the same at their end?				
8.	In case where the withdrawal claim has been rejected at	Yes/No/NA			
	CRA, whether the subscriber/claimants are contacted and				
	reasons for rejection of claim are explained to the				
	subscriber/claimants and requisite rectifications (if any)				
	are carried out by obtaining requisite documents from the				
0	subscriber/claimant?	X7 /NT /NTA			
9.		Yes/No/NA			
	proceeds are credited to the designated subscriber/				
IF Y	claimant saving bank account by the CRA?	aanda ana	ointoined	ith the recurin	and details are
	Whether prescribed books of accounts, registered and re the stipulated period as per the regulatory requirement	corus are m	amtameu W	ım me requir	eu uetans and
1.	Whether PoP has maintained all books of accounts and	Yes/No/NA			
1.	record keeping as prescribed under extant of Pension Fund	103/110/117			
	Regulatory and Development Authority (Points of				
İ	(= 0-140 OI	1	İ	1	İ

	Presence) Regulations, 2018 and amendment thereof and			
	KYC/AML/CFT guidelines?			
2.	Whether the PoP maintains branch-wise and facilitator-	Yes/No/NA		
۷.	wise or any other channel wise complete audit trail of all	1 CS/1NO/1NA		
	transactions processed under NPS Lite like – date of receipt			
	of application form/contribution, date of issuance of			
	receipt to the subscriber, date of SCF upload, date of fund			
	remittance to the Trustee Bank, date of receipt of forms at			
	the head office/nodal office, date of receipt and processing			
	of other subscriber related requests etc.?			
2	-	Yes/No/NA		
3.	1	1 es/No/NA		
	Guidelines for all activities are properly followed for the			
1	transactions routed through the associated facilitators?	NZ /NI /NIA		
4.	Whether the facilitators associated with the PoP are doing	Yes/No/NA		
	all activities under NPS Lite in accordance to Pension Fund			
	Regulatory and Development Authority (Points of			
_	Presence) Regulations, 2018?	NZ /NI /NIA		
5.	Whether the record of operating	Yes/No/NA		
	guidelines/circulars/notices/directions/regulations issued			
	by NPS Trust/ the Authority from time to time is being			
	maintained by the PoP?			
_	Reporting	NZ /NT /NTA		
1.	1 1	Yes/No/NA		
	PFRDA during last financial year are correct?	22 22 22 4		
2.	Whether the details of NPS Lite related activities	Yes/No/NA		
	undertaken by facilitators are included and reported by the			
	PoP in their periodic compliance report, as prescribed?		1	
		1		
3	Whether PoP has appointed the compliance officer /	Yes/No/NA		
3	Principal Officer/ designated director as prescribed under	Yes/No/NA		
3	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and	Yes/No/NA		
3	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and also intimated any change in regard to the same to the	Yes/No/NA		
3	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and also intimated any change in regard to the same to the Authority?			
4.	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and also intimated any change in regard to the same to the Authority?  Whether PoP is monitoring the transactions and comply	Yes/No/NA Yes/No/NA		
	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and also intimated any change in regard to the same to the Authority?  Whether PoP is monitoring the transactions and comply with reporting obligations prescribed under			
4.	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and also intimated any change in regard to the same to the Authority?  Whether PoP is monitoring the transactions and comply with reporting obligations prescribed under KYC/AML/CFT guidelines?			
4. <b>H.</b> .	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and also intimated any change in regard to the same to the Authority?  Whether PoP is monitoring the transactions and comply with reporting obligations prescribed under KYC/AML/CFT guidelines?  Adherence to Code of Conduct	Yes/No/NA		
4.	Principal Officer/ designated director as prescribed under extant PoP regulations/ KYC/AML/CFT guidelines and also intimated any change in regard to the same to the Authority?  Whether PoP is monitoring the transactions and comply with reporting obligations prescribed under KYC/AML/CFT guidelines?			

				1	
Any other matter/s,	which you may like to bring to the				
attention of the man	agement of PoP or Authority may be				
additionally provide	d as an Annexure				
					1
I/We confirm t	o consider the sample size of the en	tity while co	nducting the	audit for the	FY
	under NPS Lite as per the be	elow mention	ed categorie	s and Instruct	ions
under para B (b	):				
☐ Category A: M	Iin 5 or 100% of total transactions/insta	ınces/cases pe	er month whi	chever is lower	r for
PoPs having a sub	scriber base up to 5000.				
☐ Category B: M	Ain 10 or 100% of total transactions/ir	stances/cases	per month v	whichever is lo	wer
	subscriber base of up to 5001 to 25,00		r		
· ·	•				
	Ain 15 or 100% of total transactions/ir	istances/cases	per month v	wnichever is ic	wer
for PoPs having a	subscriber base of 25,001 to 1,00,000.				
☐ Category D: N	Ain 20 or 100% of total transactions/in	stances/cases	per month v	whichever is lo	wer
for PoPs having a	subscriber base above 1,00,000.				
☐ Category E: M	In 50 or 100% of total transactions/ir	stances/cases	per month v	whichever is lo	wer
for PoPs having a	subscriber base above 5,00,000.				
Note:					
1. Please tick ma	rk the relevant category, as applicable	to the entity.			
of subscribers	sample size is prescribed for each active, transaction related to initial conti subscribers request processing and ex	ribution, tran	saction rela	ted to subseq	_
			-		
<ul><li>3. Subscriber base as on end of the FY for which the audit is conducted to be taken.</li><li>4. Sample size indicated is minimum sample size. Auditor may determine the optimum sample so as</li></ul>					
to be able to so	atisfy himself/herself about the objectiv	res of the audi	it.	-	
· ·	uditor & Stamp of Audit Firm:				
Name of the Audit					
Membership no. / UDIN No.:	CF. INU.:				
Date:					
Date.					

Place:

Details of NPS-Lite collection account maintained by PoP as on 31st March	
·	
Section 1 – Details of total outstanding balance as on 31st March	

S.	Bank account	Name of the	Name of collection	Closing Balance	Balance held for no. of
No.	number	Bank	account	Closing Barance	subscribers

# Section 2 – Details/bifurcation of the balance outstanding (excluding un-reconciled balances) as on $31^{st}$ March \_\_\_\_\_

S.	Name of the subscriber / PRAN	Amount	Date of receipt	Date of remittance to the Trustee
No.	/ SCF Transaction details	received	of clear fund	Bank if done after 31st March

# Section 3 – Details of un-reconciled balances as on 31st March \_\_\_\_\_

S.	Name of the	PRAN	Contact	Date of	Mode of	Instrument no.	Reason for
No.	subscriber (if available)	(if available)		receipt of clear funds	payment	& name of bank (if available)	withholding the amount
	( ,		(			(	

#### Note:

- 1. Un-reconciled balance includes those entries for which POP is unable to remit the funds into NPS-Lite architecture and/or unable to refund the same.
- 2. The sum total of section 2 and 3 should be equal to total of Section 1
- 3. Attach separate sheet for each section separately, if required.

Name of the Auditor:	Name of the Compliance officer:
Membership no. / CP. No.: UDIN No.:	
ODIN No	
Signature of the Auditor:	Signature of the Compliance officer along with office
Stamp of the Audit firm:	seal:
Date:	Date:
Place:	Place:

#### **INSTRUCTIONS**

These instructions are only indicative in nature and not exhaustive. These have been prepared based on the regulatory/supervisory requirement (as per relevant Acts, rules, regulations and circulars) which keep evolving from time to time. The auditors should peruse them and report other irregularities, if observed while conducting audit.

#### A. Instructions to both Auditor and PoP:

a) The copy of audit report should be submitted to PFRDA by PoP as per the report format specified above.

## **B.** Instructions to Auditor:

- a) The auditors should clearly indicate 'Yes' indicating Compliance, 'No' indicating Non-compliance and 'NA' wherever 'Not Applicable'.
- b) Sample size indicated in the format of IAR above is minimum sample size. Auditor may determine the optimum sample so as to be able to satisfy himself/ herself about the objectives of the audit. The indicative sample size for relevant category, as applicable to the PoP (as detailed in Enclosure 1) shall be taken by the auditor.
- c) Auditor shall specifically declare about direct / indirect interest in or relationship with the Point of Presence or its shareholders / directors / partners / proprietors/ management if any and also confirm that they do not perceive any conflict of interest in such relationship / interest while conducting audit of the said Point of Presence.
- d) In case any violations/qualifications/observations are observed by the auditor the same shall be submitted as annexure with complete details and should be quantified specifying the number of instances, value etc. and the evidences should be enclosed with the Audit Report.
- e) Membership number allotted by the affiliated professional body should be quoted at the bottom of the report as provided in the format of IAR.
- f) Each page of the report shall be signed and stamped by the auditor/ e-signed.

#### C. Instructions to PoP:

- a) In case of any non-compliances/findings/observations/adverse remarks are made by the auditor, management remarks should be given against such point(s) by the PoP.
- b) PoP to mention the date on which the audit report has been presented to the Board/Management/Audit Committee for their approval and indicate corrective and preventive actions taken by the management for addressing the deficiencies along with the timeliness of when the agreed suggestions would be implemented.
- c) Improvements brought about in the operations between the last audit and the current audit shall be submitted.

**Note:** In case audit report submitted is incomplete and not as per the guidelines viz sample size not given, only certificate submitted without report etc, same would be treated as non-submission of audit report. The Authority reserves the right to direct a Point of Presence to either get the audit redone for completing the set audit process and format or change its auditor if quality of the report is not satisfactory or the audit is not carried out as per guidelines.

## D. Process flow for submission of Audit Report:

- a) Auditor to submit the first draft of the Audit report as per the prescribed format to PoP seeking management remarks.
- b) PoP to submit the Audit Report with management remarks to the Auditors within the specified timeline (in the absence of non-submission of management remarks by PoPs within timelines, it will be considered as 'PoP has no remarks to offer')
- c) Post-processing of management remarks by the Auditor by way of clearly indicating its view/comments/observation on management remarks submitted by PoP, the auditor to submit the report to PoP and in turn, PoP to submit the final audit report to Board /Audit Committee under copy to PFRDA. PoP to also submit the Board/Audit Committee observations on the Auditor Certificate to PFRDA, if any.

#### E. Indicative processes/guidance for verification of respective areas:

#### 1. Subscriber registration and documentation/PML/AML Compliance

- a) Checks and balances for Know Your Customer (KYC)/Customer Due-Diligence in accordance with PML Act/Rules.
- b) Procedure followed by the POP for informing the PRAN and other details to the subscribers & uploading to the CRA system of such data and transfer of clear funds to the Trustee bank.

#### 2. NPS Lite Subscriber Service Request management and risk management systems

- a) Procedure adopted for receipt of request for services from subscribers
- b) Mechanism for order management and execution of subscriber requests for service.
- c) Procedure adopted for providing online platform for NPS Lite account and operations facility
- d) Procedure followed for allotting of user id and password, change of password etc.
- e) Internal controls for online NPS Lite account access and usage.
- f) Process walk through and verification of procedure adopted for implementation of internal code of conduct and internal controls to prevent violation of guidelines or Service level standards stipulated for various activities under NPS Lite.

#### 3. Dealing with subscribers' funds

- a) Verification of internal controls adopted by the PoP while accepting banker's cheque / demand draft from subscribers
- b) Procedure for ensuring that receipts and payment of funds are from/to respective subscriber only
- c) Verification of following books of accounts/records
  - i. Register of contributions received (cheques, DDs and Cash or online transactions)
  - ii. Register of transaction history done by the Point of Presence upon requests from NPS Lite subscribers.
  - iii. Bank Statements
  - iv. CRA related transaction books/accounts maintained by Point of Presence (PoP)
  - v. Cash Book
  - vi. Bank Book

All such registers should at least contain information on about Name of the subscriber, PRAN, date of receipt of contribution/ subscriber request, contribution amount, branch name, date of depositing the contribution amount under NPS Lite into the NPS Lite Collection account of the PoP, date of SCF upload, date of fund remittance, date of uploading the service related requests including exit/withdrawal request into the CRA system, date of authorization by the PoP or any other additional parameter as may be considered by the PoP for maintenance of proper audit trail at the level of the PoP.

#### 4. Banking and NPS Lite account operations

- a) Procedure for segregation of own and NPS Lite subscribers' funds and instruments (in separate accounts)
- b) Internal controls for use of subscriber bank and subscriber NPS Lite accounts only for authorized purpose.

#### 5. Management of branches of PoP / facilitators and internal control

- a) System and Policy followed for opening / closing of branch Procedure adopted to inform the same to subscribers
- b) Periodicity and procedure adopted for inspection of branches / facilitators (if any)
- c) Reporting mechanism and mode of informing the inspection observations to branches / facilitators and follow up action plan
- d) Policy of fixing of roles and responsibilities of officials in head office, branches and facilitators
- e) Documentation of Internal controls and Comments on Internal controls in place

#### 6. Subscriber grievance handling

- a) Mechanism to monitor complaints lodged with branches / facilitators and entry of the same in CGMS system of CRA.
- b) Mechanism to monitor complaints lodged in CGMS in CRA against POP. Maintenance of complaints register.
- c) Redressal mechanism for complaints registered against the POP Verification of subscriber grievance register and email id
- d) Internal control for verification of complaints received through the designated email -id

#### 7. Maintenance of Books of Accounts

As prescribed under extant regulations of Pension Fund Regulatory and Development Authority (Points of Presence) Regulations, 2018 and amendment thereof, books of accounts, registers and records to be maintained, with the required details and for the stipulated period as per regulatory/supervisory requirement. All such records can be maintained electronically in retrievable mode (as and when required), however physical copies of relevant documents are to be maintained by concerned office.

#### F. References:

Please refer following website for more information:

- a) www.pfrda.org.in
- b) www.npstrust.org.in
- c) www.npscra.nsdl.co.in