



GEECEE FINCAP LIMITED

*POLICY ON ADVANCED SUPERVISORY MONITORING
SYSTEM OF RBI – DAKSH*

(Effective from 07th February, 2024)



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TERMS OF REFERENCE FOR ADVANCED SUPERVISORY MONITORING SYSTEM
OF RBI - DAKSH

BACKGROUND

The Reserve Bank of India (“RBI”) vide notification dated April 24, 2023 bearing Ref. No. CO.DOS.RSD.No. S438/31-01-105/2023-24 has put in place the implementation of “DAKSH – Reserve Bank’s Advanced Supervisory Monitoring System – Usage by Supervised Entities” for the purpose of timely implementation and proper usage of DAKSH by the regulated entities. With the intention to make the supervisory process more efficient and robust, RBI introduced an Advanced Supervisory Monitoring System to be termed as **“DAKSH”**. It is a web-based end-to-end workflow application through which RBI shall monitor applicable compliance and shall focus for improving the compliance culture within the Company. Accordingly, the Board of Directors of the GeeCee Fincap Limited (“the Company”) has formulated a policy for the implementation of the DAKSH guidelines to be called as Policy on Advanced Supervisory Monitoring System of RBI.

As per the guidelines issued by the RBI, DAKSH is proposed to extend features which shall enable seamless communication with the regulator, inspection planning, execution, compliance submission & monitoring, complaint handling & processing, cyber incident reporting, and calling of ad-hoc information via returns.

GUIDELINES FOR DAKSH

For achieving the desired objectives from the advanced supervisory monitoring system, Reserve Bank of India has prescribed the guidelines for the usage of the portal. The Company shall ensure the following with regard to compliance with the DAKSH:

- A. The senior management shall continue to familiarize itself with the features/ workflows available in DAKSH and advises the concerned officials for taking necessary action for smooth rollout and effective adoption of DAKSH.
- B. The Company shall ensure that the usage of DAKSH is being done in secure and authorized environment and the contents shared/provided in DAKSH by RBI and the Company are appropriately protected against unauthorized distribution or access.
- C. The access to the DAKSH is allowed in their network and is made from a sanitized environment/desktop with updated operating system/browsers free from virus/malware and the access points are provided with appropriate anti-virus solution and access is made through authorized network.



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- D. The users for DAKSH has been granted roles/access on need only basis. Periodic review of users shall be carried out by the Company so as to ensure the availability of active users with appropriate roles and up-to-date details.
- E. The roles assigned to users are allowed as per usual manual and matching with users' responsibility and the change in the user's status, on account of promotion/ transfer/ separation from the organization or otherwise, is being immediately updated in DAKSH.
- F. The Company shall regularly login to portal to check the notifications, alerts and pending items in their queue and take appropriate action.

The roles of the different verticals within the Company shall be specified who shall be created as the users for the DAKSH portal only to the extent of the area of work assigned to them. The users/roles which have been created shall be reviewed periodically by the **IT Strategy Committee** of the Company and changes if any required shall be affected in accordance with the RBI circular.

GUIDELINES FOR USER CREATION

The working on the DAKSH portal shall be based on the Maker/ Checker User principle. The Users authorized with the maker rights can only enter/ edit the data on the module forms. Further the Company shall designate the Users with checker rights who shall review the module forms filled by the User Maker and consequently approve or reject the submissions. Single user can have multiple roles (in the same module or across module). The details of the Admin User/Maker and the Admin Checker shall be registered with the RBI and any change in the information, including the change in the users shall be informed to the RBI immediately. These Admin User/Maker and the Checker shall on the basis of the internal approval and as per the process prescribed below shall process the onboarding of the other makers/checkers to the DAKSH including the assignment of the roles.

As per the directions of RBI, the Company shall follow the below mentioned process for user creation and maintenance, along with the framework for mandatory filing of user creation/ update/ de-activation form and approval for the same from the appropriate authority. The information regarding user creation and maintenance is to be made readily available, whenever sought by RBI.

The person who is to be designated with any role prescribed in the DAKSH Portal shall be required to submit a written declaration to the Company (as per the **Annexure 1**) to the effect that he shall use the User ID of the DAKSH only for the intended purpose for which he has been authorized by the Company and agree to abide by all the applicable guidelines issued with



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regard to the DAKSH portal. The signed form shall also cover the employment details, date of User creation/ deactivation, roles assigned etc.

The details of the user as per above shall be submitted to the below mentioned approving authority who shall approve the same by capturing the details as covered in **Annexure 2**.

The approval for user creation/update/deactivation must be approved as mentioned under:

- a. User update shall be approved by either the Chief Compliance Officer (CCO) or the Chief Information Security Officer (CISO).
- b. For user who is a Senior Officer or SE Admin Checker, the approval shall be provided by the CXO (CCO/CISO/CFO/CRO/CTO/COO/CEO) level official.
- c. For CXOs (CCO/CISO/CFO/CRO/CTO/COO/CEO) and where CXOs are SE Admin Checker, the approval shall be provided by any two members of top Management.

The approver shall ensure that:

- i. Only individual corporate email accounts are being used for the user creation on DAKSH as RBI Guidelines prohibits using generic email accounts.
- ii. The user shall be the employee of the company.
- iii. The user who is being on boarded shall give his or her own registered mobile number which shall be up to date on DAKSH.
- iv. User with role Admin Checker to be of sufficiently senior level in the organization.

NODAL OFFICER

With a view to ensure proper implementation and usage of the DAKSH, the RBI has advised that the Company shall ensure that a sufficiently Senior Level Officer (equivalent to Deputy General Manager or above) is given the responsibility of being Nodal Officer. Nodal Officers shall be the point of contact for DAKSH related communications with RBI. In accordance with the same, the Company has decided to appoint a person who is designated as CCO of the Company as the Nodal Officer.



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Annexure - 1

User Creation/ Update/ Deactivation Form for DAKSH

Applicant details	
Name of the Supervised Entity	
Name and designation of applicant	
E-mail ID of applicant (individual corporate account only)	
Registered Mobile Number of the applicant	
Whether an employee?	YES (non-employees are not allowed on DAKSH)
Employee ID/No. of the applicant	
Date of joining the organization	
Date of user creation/ update/ deactivation	
Reason for user creation/ update/ deactivation	
Role(s) to be assigned/ updated to the user. SE Admin role to be assigned to sufficiently senior position.	
Ticket Reference no. (created in Ticketing application)	
End User Acknowledgement	



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I shall use the user ID assigned for the intended purpose only and agree to abide by all applicable guidelines.

Name:

Signature:

Date:

Annexure - 2

To be filled by Approving Officer of SE User (please refer to the guidelines under para 3 below)	
Name of the Approver	
Designation of the Approver	
Applicant's user details and the roles to be assigned to the user verified (Y / N)	
Approved (Y / N)	
Remarks / Reason for approval	
Contact number of the approver	
E-mail ID of the approver	
Signature and Date	

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