



NBFC *FinSight*

Fueling Bharat's Dreams, One Update at a Time

Prepared By:

Dinesh Gupta

DSB Law Group

Welcome to NBFC FinSight

It is with immense pleasure that we present to you the inaugural edition of the DSB Law Group's monthly newsletter, NBFC FinSight, dedicated exclusively to providing insightful, practical, and timely analysis of the evolving landscape of Non-Banking Financial Companies (NBFCs). In today's rapidly changing environment, staying ahead is no longer merely desirable - it is essential. This newsletter is an extension of our firm's long-standing commitment to innovation and deep expertise in helping NBFCs navigate complexities and optimize their operations.

Over our four-decade journey in financial services, we have witnessed transformative shifts in the regulatory environment surrounding NBFCs. Before 1997, when formal registration began, NBFCs were perceived simply as another business entity. Today, under stringent regulatory oversight by the RBI, they have evolved into highly regulated institutions, becoming pivotal players in the financial ecosystem.

This evolution has provided us at DSB with extensive exposure and valuable experience in product innovation, process enhancement across various NBFC types, and adept interpretation of regulatory changes tested over time. We have a proven track record of successfully setting up and nurturing many financial institutions—from emerging startups to large-scale enterprises—that have delivered significant value to stakeholders and positively impacted the national economy.



DSB Law Group is committed to delivering client-focused, value-driven solutions for NBFCs, positioning itself as a comprehensive service provider across multiple states. With a focus on redefining NBFC operations and strengthening last-mile delivery, the firm blends human expertise with technology to drive inclusive growth across Bharat.

Through NBFC FinSight, we aim to deliver comprehensive analyses of crucial regulatory updates, timely compliance alerts, and actionable strategies to overcome operational challenges. Our guidance covers regulatory compliance, strategic management policies, and tailored advice designed to help NBFCs achieve excellence and stay compliant proactively. Our ultimate objective is to empower you with actionable intelligence that not only informs but strategically positions you to adeptly navigate the complexities inherent in today's NBFC environment.

Stay Informed. Stay Compliant. Stay Ahead.

Warm Regards,

Dinesh Gupta
Chief Editor – NBFC FinSight



*Empowering SME's
& Going Beyond*

RBI Circular on Prevention of
Financial Frauds
(PFF Notification, January 17, 2025)

Summary By:
Kanika Gupta, Corporate Consultant

The Reserve Bank of India (RBI) issued the "Prevention of financial frauds perpetrated using voice calls and SMS – Regulatory prescriptions and Institutional Safeguards" (PFF Notification) on January 17, 2025. This regulation aims to mitigate risks from unsolicited commercial communications (UCC), curb digital fraud, and reinforce existing guidelines by the Telecom Regulatory Authority of India (TRAI).

Key Compliance Requirements:**1. Applicability:**

Applicable to all regulated entities (REs), i.e.:

- a) Commercial Banks (including Regional Rural Banks, Small Finance Banks, Payment Banks, and Local Area Banks),
- b) Primary (Urban) Co-operative Banks, State Co-operative Banks, District Central Co-operative Banks,
- c) Prepaid Payment Instrument Issuers,
- d) Non-Banking Financial Companies (including Housing Finance Companies),
- e) Credit Information Companies,
- f) Payment Aggregators, Payment Systems Participants and Payment System Providers

2. Deadline : Compliance deadline is March 31, 2025.

3. Mobile Number Revocation List (MNRL):

Entities must use the MNRL published monthly on the Digital Intelligence Platform by DoT to identify and remove disconnected or fraudulent mobile numbers from customer databases. This list includes numbers disconnected due to fraud, cybercrime involvement, misuse, and inactivity

4. Standard Operating Procedures (SOPs):

Entities must establish internal SOPs to verify registered mobile numbers, monitor accounts linked to revoked numbers, and prevent their misuse as money mules or in cyber frauds.

5. Sharing Customer Data with Digital Intelligence Platform:

Verified customer details must be shared with DoT's. Digital Intelligence platform and published on the "Sanchar Saathi" portal to facilitate reporting of fraudulent activities.

6. Dedicated Voice Call Number Series:

Entities must use "160xx" numbers for transactional/service calls and "140xx" for promotional calls, informing customers about these numbers through various communication channels in multiple languages.

7. Adherence to TRAI Regulations and Digital Consent Acquisition (DCA):

Entities must strictly comply with TRAI's important Guidelines, including the mandatory use of Distributed Ledger Technology (DLT) for commercial communication, using registered headers and obtaining customer consent exclusively through the digital consent acquisition system.

8. Data Confidentiality and Security:

Entities bear primary responsibility for protecting customer data, preventing leakage or misuse, and promptly reporting any incidents to law enforcement agencies. It is preferred that financial institutions directly connect with telecom providers, minimizing reliance on telemarketers.

9. Traceability and Registration Requirements:

All SMS and voice communication must occur via registered headers and content templates through the DLT platform. Entities must regularly verify and limit registered headers/templates and maintain strict compliance to prevent misuse.

10. Customer Awareness and Education:

Entities must actively inform customers about the registration of transactional calls (160 series), processes to avoid unwanted promotional communications, and mechanisms for registering complaints, communicated in local languages for wider understanding.

"These measures collectively aim to significantly reduce financial frauds via telecom channels, strengthen data security practices, and enhance consumer protection in India's financial sector."

Editorial: MFI Sector- The Way Forward

By Dinesh Gupta, Corporate Advisor

For years, India's microfinance sector stood tall as a symbol of disciplined repayment and grassroots empowerment. In village corners and dusty small-town offices, group meetings and collection registers told stories of trust, peer responsibility, and human connection. But recent years have shaken that foundation. Events like demonetization and the COVID-19 pandemic exposed deep cracks - not just economic, but operational and cultural. And while the sector still plays a vital role in financial inclusion, it's time we confront the hard truths about how collections are managed, and more importantly, where we go from here.

At the heart of the issue is a collection model that hasn't aged well. Built on cash handling, field visits, and peer guarantees, the system worked—until it didn't. When cash dried up and movements were restricted, collection discipline eroded. The fallout was serious: repayment rates declined, fraud crept in and operational inconsistencies surfaced.

These challenges necessitate the urgent need to rebuild institutional trust, both among communities and financial partners, through stronger governance and greater transparency.

We must ask ourselves - can a model so vulnerable truly support sustainable financial inclusion?

Reimagining Collections in India's Microfinance Sector—A Call for Clarity, Stability and Trust

The answer lies in reimagining collections of the broad spectrum of microfinance network not as a back-end chore, but as a core function that needs dedicated structure, modern tools, and clear accountability. Let's start with the basics. MFIs need to move away from manual cash-heavy operations. With the rise of UPI and the growing reach of digital payment systems, the tools are there. But adoption requires effort—customer education, digital literacy training, and yes, a bit of patience. Change won't come overnight, especially in areas where even a smartphone is a luxury. But we have to start.

Microfinance Sector in India: Key Metrics (FY2021–22 to FY2024–25)

Metric	FY 2021–22	FY 2022–23	FY 2023–24	FY 2024–25 (Est.)	YoY Change (FY24–25)
Gross Loan Portfolio (₹ Cr)	2,85,441	3,19,080	4,33,697	4,24,000	↓ 2.2%
Active Borrowers (Cr)	5.95	6.60	7.80	7.80	→ Stable
Active Loans (Cr)	12.38	12.38	14.90	14.90	→ Stable
Collection Efficiency (%)	95–98	95–98	95–98	95–98	→ Stable
PAR >30 (%)	6.0	5.5	2.29	8.8	↑ 6.51 pp
PAR >90 (%)	3.1	2.7	1.16	3.3	↑ 2.14 pp
Gross NPA (%)	5.2	2.7	1.16	13.0	↑ 11.84 pp
Average Ticket Size (₹)	45,000	48,000	50,127	51,691	↑ 3.1%
Disbursement Amount (₹ Cr)	1,07,186	1,14,000	1,04,546	93,000	↓ 11.0%
Disbursement Volume (Lakh Loans)	205	238	162	135	↓ 16.7%

Portfolio at Risk (PAR) & Gross NPA: A notable deterioration in asset quality is observed in FY2024–25, with PAR >30 and Gross NPA ratios increasing significantly, indicating rising credit risk.

Sources: MFIN India Microfinance Review FY 2023–24, MFIN Micrometer Q3 FY 2024–25, NABARD Status of Microfinance in India 2023–24, Financial Express, Economic Times.

Next, the role of the Field Officer must evolve. Overworked and under-incentivized, they carry the burden of collections, customer relationships, disbursement and everything in between. It's time to establish a robust collection strategy with teams focusing on stressed collections, clearly separated from disbursement operations, with a well-defined structure and accountability framework. These teams must be equipped not only with focused training and real-time tracking systems, but also a standardised collection protocol that promotes consistency, fairness, and transparency.

Technology should be their ally: geo-tagging, MIS dashboards, real-time delinquency alerts—these aren't luxuries, they are necessities in today's environment to overcome these challenges. Internal control is another area where MFIs must step up. Branch oversight cannot be a once-in-a-quarter ritual. Frequent audits with technological intervention, real-time reconciliation, and clearly defined escalation protocols are essential if we want to catch missteps early and foster a culture of responsibility.

And then there's the customer—who often bears the brunt of system failure. We owe them better communication, greater transparency, and a clear understanding of what default means—not just in terms of credit scores but in the broader trust ecosystem.

Repayment must become a shared responsibility, rooted in mutual respect, not fear or confusion.

There's also a place for thoughtful legal recourse. For wilful defaulters who exploit the system, MFIs should use cost-effective legal mechanisms like arbitration or mediation. Done fairly and swiftly, these steps can protect institutions without alienating the broader customer base.

Finally, we must not overlook the role of institutional culture and borrower engagement. Strengthening JLGs/SHGs by ensuring regular attendance, reinforcing peer accountability, and revitalising the principle of group guarantee can go a long way in restoring collective discipline and shared responsibility at the grassroots level. Celebrate employees who perform with integrity. Recognise branches that turn around portfolios. Make excellence visible and valued. In a sector built on trust, human motivation is still the strongest lever we have.

The path ahead isn't easy. There will be resistance. There will be learning curves. But if the microfinance sector is to serve its purpose - not just survive but truly uplift - it must build collection systems that are resilient, honest, and fit for the world we live in now.

Let's not wait for the next crisis to learn the same lessons again.

Key Remedial Measures

- Strengthen central MIS for early detection of delinquency trends.
- Introduce NACH auto-debit pilots with financial literacy support.
- Establish low-cost legal routes like arbitration for chronic defaulters.
- Use geo-tagging and geo-fencing to monitor field officers' movements.
- Implement performance-linked rewards and recognition for collection staff.
- Encourage UPI and digital payments through customer training and incentives.
- Enhance branch-level audits and offer better incentives to reduce staff attrition.
- Regularly educate customers on repayment obligations and default consequences.
- Deploy dedicated digital modules for real-time collection tracking and reconciliation.
- Separate collection teams for stressed portfolio from disbursement roles with clear accountability.

NBFC Compliance Calendar- April 2025

Apr-25	Income Tax/PF /ESIC		GST		RBI	
Dates	Return	Compliance	Return	Compliance	Return	Compliance
07-Apr	Monthly TCS Payment	Taxpayers collecting TCS for the month of MARCH 25				
10-Apr			GSTR-7 Filing:	Due date for persons required to deduct TDS under GST for the month of March 2025.		
11-Apr			GSTR-1 Filing (Monthly):	For taxpayers with annual turnover > ₹1.5 crore or who have opted for monthly filing.		
13-Apr			GSTR-6:	For Input Service Distributors (ISD) for March 2025.		
			Quarterly GSTR-1 (QRMP scheme):	Filing for Jan-Mar 2025 quarter.		
15-Apr	ESI Challan	Employers registered under ESI Act for the month of March 25			DNBS-4B Return	Base Layer NBFC with Asset Size of 100 Crore and Above & Middle Layer NBFC relating to Short term Dynamic Liquidity-Return of Structural Liquidity & Interest Rate Sensitivity
	PF Challan (ECR)	Employers registered under EPF Act for the month of March 25				
20-Apr			GSTR-3B (Monthly)	For taxpayers with:		
				Annual turnover > ₹5 crore, or		
				Opted for monthly filing, for March 2025.		
21-Apr					Financial Details Return (DNBS02)	Base Layer NBFC for Reporting financial position, asset classification, and liabilities
					DNBS-01, DNBS-03 Returns	Middle Layer and Upper Layer NBFC for financial performance, risk, and deposits
					DNBS-4A Return	Base Layer NBFC with Asset Size of 100 Crore and Above & Middle Layer NBFC relating to Short term Dynamic Liquidity
					Return of Overseas Investments (DNBS13)	Base Layer NBFC For Overseas Investment

Apr-25	Income Tax/PF /ESIC		GST		RBI	
Dates	Return	Compliance	Return	Compliance	Return	Compliance
22-Apr			Quarterly GSTR-3B (Group 1 States/UTs):	For Jan-Mar 2025 quarter under the QRMP scheme.		
24-Apr			Quarterly GSTR-3B (Group 2 States/UTs):	For Jan-Mar 2025 quarter under the QRMP scheme.		
25-Apr	PF returns(Form 5 , Form 10, Form 2, Form 12 A, Form 3A, Form 6A)	Employers covered under EPF for the month of March 25				
30-Apr	Monthly TDS Payment	Taxpayers deducting TDS for the month of March 25	GSTR-4 (Annual)	Composition of taxpayers' annual return FY 2024-25	Board Resolution for Public Deposit	NBFC-ICC for Declaration of NON Acceptance of Public Deposits
					Board Resolution for Acquisition of Shares/Securities	All NBFC investing in Shares /Securities in Group or Subsidiary Companies
					Appointment of Statutory Central Auditor (Form A)	All NBFC -Certification of appointed Statutory Auditors
					Grievance Redressal & Customer Protection Compliance	All NBFC-Ensuring a proper grievance redressal mechanism and adherence to RBI's Fair Practices Code (FPC)
					FDI Compliance Certificate (FDI- SAC)	HFCs with Foreign Direct Investment
					Interest Rate Futures (IRF) Transaction Statement	NBFCs engaging in derivatives
					Loan Securitization & Borrowing Compliance	NBFCs engaged in loan securitization for Ensuring adherence to RBI securitization & direct assignment guidelines
					DNBS08 – CRILC- Main	Base Layer NBFC with Asset Size of 100 Crore and Above & Middle Layer NBFC relating to Short term Dynamic Liquidity-Return for Large Credits & SMA

NBFC Compliance Calendar- May 2025

May-25	Income Tax/PF /ESIC		GST		RBI	
Dates	Return	Compliance	Return	Compliance	Return	Compliance
07-May	Monthly TCS Payment	Taxpayers collecting TCS for the month of April 25				
	Monthly TDS Payment	Taxpayers collecting TDS for the month of April 25				
11-May			GSTR-1 Filing (Monthly):	For taxpayers with annual turnover > ₹1.5 crore or who have opted for monthly filing.		
12-May					Prudential Norms Information (Schedule-II Return)	Housing Finance Companies (HFCs)-Reporting capital adequacy, provisioning, NOF, and asset classification
					ALM-II Statement	Deposit-taking & Large NBFCs-Reporting liquidity and interest rate sensitivity
15-May	TCS Return	TCS Return in Form 27EQ for Jan-Mar 2025 Quarter			DNBS-4B Return	Base Layer NBFC with Asset Size of 100 Crore and Above & Middle Layer NBFC relating to Short term Dynamic Liquidity-Return of Structural Liquidity & Interest Rate Sensitivity
	ESI Challan	Employers registered under ESI Act for the month of April 25				
	PF Challan (ECR)	Employers registered under EPF Act for the month of April 25				
20-May			GSTR-3B (Monthly)	For taxpayers with:		
				Annual turnover > ₹5 crore, or		
				Opted for monthly filing, for March 2025.		
30-May	TDS Payment	TDS Payment in Form 26QB (Property), 26QC (Rent), 26QD (Contractor Payments), 26QE (Crypto Assets) for Apr 2025			DNBS08 – CRILC-Main	Base Layer NBFC with Asset Size of 100 Crore and Above & Middle Layer NBFC relating to Short term Dynamic Liquidity-Return for Large Credits & SMA
	Issue of TCS Certificates	Form 27D for Jan to March 2025				
31-May	TDS Return filling	Q4 of FY 2024-25 (January to March 25)				

S No.	In addition to above:	
1	Statutory Compliance Board Meetings	All NBFC -Quarterly meetings discussing regulatory updates-4 times a year as per Companies Act
2	FEMA Foreign Investment Reporting	NBFCs with FDI -Report any foreign direct investment (FDI) transactions to RBI on Monthly Basis as per FEMA and RBI FDI Guidelines
3	Customer Complaint Tracking	All NBFC's -Maintain records of customer grievances and resolutions as per RBI guidelines on Monthly Basis as per RBI Fair Practices Code
4	CERSAI Reporting (Central Registry of Securitization and Asset Reconstruction)	NBFCs engaged in secured lending -reporting securitization and asset reconstruction transactions on Weekly Basis as per SARFAESI Act
5	CKYC Uploads	All NBFCs onboarding new customers-Reporting new customer onboarding under Central KYC on Weekly Basis as per CKYC RBI Circular
6	FIU-IND Reporting (Suspicious Transaction Reporting – STR)	All NBFCs -Submission of suspicious transaction reports to FIU-IND on Weekly basis as per Prevention of Money Laundering Act

DSB Law Group Pvt. Ltd.

Trusted Legal Advisors. Strategic Business Partners.

A Legacy of Growth and Expertise

Founded in 1967 by Shri K.M. Gupta, DSB Law Group has evolved from a specialized taxation practice into a full-service legal and business advisory platform. Since 1984, under the guidance of Shri Dinesh Gupta, the firm has broadened its focus to include corporate law, banking, NBFC regulations, and governance frameworks, merging legal accuracy with strategic insight. With a commitment to innovation and adaptability, DSB Law Group has consistently stayed ahead of industry trends, ensuring that clients receive forward-thinking solutions tailored to their unique needs. This evolution reflects our dedication to not only understanding the complexities of law but also the dynamic nature of business environments.

Our team of seasoned professionals combines deep legal knowledge with industry-specific expertise, allowing us to offer bespoke solutions that drive success in an ever-changing landscape. Whether navigating intricate regulatory challenges or crafting strategies for expansion, we are partners in our clients' journeys, empowering them to achieve their fullest potential.

As we continue to grow, our mission remains clear: to provide unparalleled legal services that are as diverse as the clients we serve, ensuring their continued success and prosperity in all their endeavors.

Our solutions are not just legally sound — they are designed to create tangible value for clients by aligning with their business objectives and regulatory environment. We work with a wide range of enterprises, providing strategic counsel that enables operational clarity, regulatory compliance, and sustainable growth. With a proven track record of fostering growth, DSB has been instrumental in turning startups into success stories and helping large businesses scale new heights.

At DSB Law Group, we are committed to excellence, integrity, and building enduring partnerships with the businesses we serve.

With over five decades of experience, DSB Law Group Pvt. Ltd. today offers specialized services across:

- Corporate & Financial Law
- NBFC Regulatory and Business Advisory
- Banking Regulatory Advisory
- Fintech Regulations
- Taxation and Labour Law
- Legal Risk & Compliance Strategy
- Project Consulting and Business Structuring
- Intellectual Property Rights
- Technology Consultancy



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Empowering SME's & Going Beyond