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| <b>Department: Inspection</b>           | <b>Segment: All</b>        |
| <b>Circular No: MSE/INSP/17523/2025</b> | <b>Date: July 18, 2025</b> |

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**Subject: Technology based sharing mechanisms of common submissions among Exchanges**

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To All Members,

As part of reporting requirements, Stockbrokers currently submit various compliance reports/submission periodically to all the stock exchanges where stockbrokers are registered as a member. Stockbrokers who are registered with multiple Exchanges, are required to submit the same compliance reports to each Exchange separately. Hence there are multiple repetitions for Stockbrokers while carrying out report submission activities across the exchanges.

For promoting ease of doing business for the Stockbrokers and to avoid submission of same compliance report multiple times, Stock Exchanges have developed a technology-based sharing mechanism for the sharing of compliance report/information among exchanges. The objective behind the same is to do away with the duplication of activities to be carried out by Stockbrokers for common periodic submission of data/documents to multiple Exchanges. The submissions which are common across exchanges and do not have exchange specific data/submissions will be considered for Common Reporting.

In view of the above, it is decided that henceforth, Members of the exchange who are also registered with NSE are required to submit their compliance reports to NSE only. NSE in turn will share such compliance reports (including data/documents) with the Exchange. Submitting data to NSE alone will be treated as submission to Exchange and the same will be in compliance of the regulatory requirements for such stockbrokers.

The technology-based sharing mechanisms of common submissions among Exchanges is for the purpose of ease in the reporting requirement for stockbrokers, however the processing of the submission along with the monitoring and supervision of compliance will continue to be carried out by respective stock exchanges as per the existing process.

The technology-based sharing mechanisms of common submissions among Exchanges will be operational in phase manner with effective from **August 01, 2025**. To start with in phase-I, Members of the exchange who are also a member of NSE are not required to submit 40 compliance reports/submissions as mentioned in enclosed **Annexure A** to the exchange.

**Members of the exchange who are not registered with NSE will continue to make submissions to the exchange as per existing process.** Summary details of said 40 compliance reports are as under:

| <b>Particulars</b>   | <b>No. of compliance reports/submission</b> |
|--|---|
| Qualified Stockbroker (QSB) compliances  | 39  |
| Reporting for Artificial Intelligence (AI) and Machine Learning (ML) applications and systems offered and used by market intermediaries. | 1   |



All Members are advised to take note of the above & comply.

In case of any query kindly contact Inspection Department on (022) 6112 9000, Extn. 9039, 9040, 9041, 9042 & 9078 or mail on '[compliancemsx@msei.in](mailto:compliancemsx@msei.in)' or '[inspectionmsx@msei.in](mailto:inspectionmsx@msei.in)'.

**For and on behalf of**  
**Metropolitan Stock Exchange of India Limited**

**Chirag Sodawaterwalla**  
**AVP – Inspection and Membership Department**

**Annexure A**

| <b>Sr. No.</b> | <b>Submission</b>   | <b>Frequency/due date</b>          | <b>Relevant circular reference</b>                        |
|----------------|---|------------------------------------|---|
| 1              | Composition of the BoD, details of qualification, experience and expertise of Board members and their terms of appointment to the Exchange.   | Within 45 days from end of quarter | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.1.1 to 8.1.3 |
| 2              | Composition of the committees of the BoD, details of qualification, experience and expertise of Committee members, date of constitution of Committee, approvals taken for constitution of Committee and terms of appointment of members and Delegation of Authority Matrix / Terms of Reference (TOR).  | Within 45 days from end of quarter | MSE/INSP/13570/2023- Annexure A - Ref no. 8.1.1 to 8.1.3  |
| 3              | Signed and dated copies of Minutes of Board and Committee meetings relating to incidents/vulnerabilities including operational, technology and financial including observations and corrective actions taken/ recommended by Board/Committee along with plan of action and measures taken to prevent recurrence to be submitted.  | Within 45 days from end of quarter | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.1.1 to 8.1.3 |
| 4              | Signed and dated copies of Minutes of Audit Committee and Board meeting for the following:<br>The CFO or analogous person to place financial status of the entity, disclose any related party transactions, inter- corporate loans and investments, internal financial controls, and financial risk management systems before the Audit Committee/Board and submit a declaration that financial statements are in compliance with listing and other legal requirements and adhere to regulatory provisions. The CFO or analogous person to prompt intimates the Board regarding specified indicators having an adverse impact on financial health. The CFO or analogous person to disclose to the Audit Committee/Board any related party transactions, inter-corporate loans and investments and provide a declaration that such transactions have been undertaken at arm's length. The CFO or analogous person to provide an update to the Audit Committee/Board on the measures taken for strengthening the internal financial controls and financial risk management systems during the quarter. All declarations and certifications provided by the CFO or analogous person to be incorporated within the Minutes of such Audit Committee /Board meetings. | Within 45 days from end of quarter | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.1.1 to 8.1.3 |

| Sr. No. | Submission  | Frequency/due date  | Relevant circular reference   |
|---------|---|---|---|
| 5       | Signed and dated copies of Minutes of Nomination and Remuneration Committee (NRC) meeting for the following: Evaluation of the NRC and approval for appointment of Directors, KMPs, Compliance Officer and other senior management employees to be recorded in the Minutes of such Committee meetings.  | Within 45 days from end of quarter  | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.1.1 to 8.1.3           |
| 6       | Intimation to the Exchange regarding appointment of Director/KMP/Compliance Officer/other senior management employees to be provided.   | Within 7 days of such appointment   | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.1.1 to 8.1.3           |
| 7       | In case of any change in the composition of the committees, QSBs to provide an intimation to the Exchange.  | Within 7 days from the change   | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.1.1 to 8.1.3           |
| 8       | Updated Risk Management Policy and Minutes of Risk Management Committee Meetings. Minutes of the meeting to include approval and adoption of Risk Management Policy, an update on the implementation of the Policy and automation undertaken during the half-year and observations of the Committee.  | Within 45 days from end of half year.                                     | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.2.1 to 8.2.2 and 8.2.7 |
| 9       | A report on the risk assessment to be placed before the Risk Management Committee and observations and remarks of the Committee on the risk assessment to be incorporated in the Minutes of Meeting. Minutes to be submitted.   | Within 45 days from the end of quarter in which the assessment is placed. | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.2.1 to 8.2.2           |
| 10      | Organization Structure defined designation-wise and department-wise.  | Within 30 days from end of financial year.                                | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.2.4 to 8.2.5           |
| 11      | Department-wise count of employees (including full time and contractual employees).   | Within 30 days from end of financial year.                                | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.2.4 to 8.2.5           |
| 12      | Access Control Policy includes list of critical departments to which such policy is applicable.   | Within 30 days from end of financial year.                                | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.2.4 to 8.2.5           |
| 13      | Training Calendar along with count of attendees.  | Within 30 days from end of financial year.                                | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.2.4 to 8.2.5           |
| 14      | Incidents w.r.t. leakage of investor data shall be documented and placed before the Board for their consideration and their recommendations to be duly recorded in the minutes of the Board Meeting. Signed and dated copies of Minutes of Meetings of the Board of Directors and committees of the Board to be provided to the Exchange including observations and corrective action recommended by Board. | Within 45 days from end of quarter  | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.2.4 to 8.2.5           |
| 15      | Updated Information Technology Policy along with Minutes of Meeting of the Information Technology Committee for formulation and review of policy.   | 45 days from end of half year   | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.3.1                    |

| Sr. No. | Submission   | Frequency/due date                     | Relevant circular reference                                 |
|---------|--|--|---|
| 16      | CTO/CIO of QSBs to submit declaration / certification to the Exchange for technical capacity.  | 45 days from end of quarter            | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.3.2            |
| 17      | Board approved Winding Down Policy and SOP (including changes made to the Policy or SOP during the financial year) to the Exchange.  | 30 days from end of financial year.    | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.4.1 to 8.4.2   |
| 18      | Updated cybersecurity framework to the Stock Exchange along with minutes of meeting of the Cybersecurity/Technology Committee in which the Cybersecurity Framework was approved and adopted and an update on the implementation of the Cybersecurity Framework during the previous half-year was provided to the Committee along with compliance status of point 8.5.4 to 8.5.7 of Annexure A of MSE circular MSE/INSP/13570/2023. | 45 days from the end of half year.     | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.5.1 to 8.5.7   |
| 19      | Name, designation, qualification, past experience and expertise of person appointed as CISO and count of security analysts deployed  | 30 days from the end of financial year | MSE/INSP/13570/2023- Annexure A - Ref no. 8.5.4 to 8.5.7    |
| 20      | Minutes of meetings of the Cybersecurity / Technology Committee to include the following details:<br>a) Cybersecurity framework,<br>b) Details of Cybersecurity drills<br>c) Trainings programs w.r.t cybersecurity conducted during the half-year.  | 45 days from the end of half year.     | MSE/INSP/13570/2023- Annexure A - Ref no. 8.5.4 to 8.5.7    |
| 21      | Details and observations of Cybersecurity drills and awareness trainings conducted for its employees.  | 45 days from end of quarter            | MSE/INSP/13570/2023- Annexure A - Ref no. 8.5.4 to 8.5.7    |
| 22      | BCP Policy and SOP to the Exchange.  | 45 days from the end of half year      | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.5.10 to 8.5.13 |
| 23      | Details, and observations of BCP drills  | 30 days from end of quarter            | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.5.10 to 8.5.13 |
| 24      | A signed and dated copy of Minutes of Board Meeting in which the implementation of BCP-DR policy was placed before the Board to be submitted to the Exchange.  | 45 days from end of quarter            | MSE/INSP/13570/2023 - Annexure A - Ref no. 8.5.10 to 8.5.13 |
| 25      | General Trial Balance with Balance Sheet wise grouping and notes to accounts schedule wise sub-grouping.   | 60 days from end of quarter            | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1              |
| 26      | Details of contingent liabilities  | 60 days from end of quarter            | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1              |
| 27      | Client ledgers of Top 20 clientele debtors and creditors in prescribed format  | 15 days from end of month              | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1              |
| 28      | Client ledgers of Top 20 clientele with highest (peak/EOD) margins in prescribed format  | 15 days from end of month              | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1              |

| Sr. No. | Submission  | Frequency/due date  | Relevant circular reference   |
|---------|---|---|---|
| 29      | List of associates/related entities   | 15 days from end of month   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 30      | Ledgers of all associates/related entities having client codes in the prescribed format.  | 15 days from end of month   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 31      | Details of borrowings/loans taken from banks/financial institutions   | 15 days from end of month   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 32      | Details of loans & advances taken/given to/from all parties including between group / Associate Companies   | 15 days from end of month   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 33      | Details of total investment   | 15 days from end of month   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 34      | Declaration w.r.t compliance with circulars on Display of Brokerage, Statutory & Regulatory Levies  | 30 days from end of quarter   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 35      | Declaration w.r.t compliance with circular's on Code of Advertisement   | 30 days from end of quarter   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 36      | Declaration w.r.t compliance with circulars on Supervision of Authorised Persons (APs) & Branches by Members  | 30 days from end of quarter   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 37      | Declaration w.r.t compliance with circular's on Compliance with Exchange guidelines requiring members to refrain from unauthorized market practices | 30 days from end of quarter   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 38      | Declaration w.r.t compliance with circular's on Undertaking on 'Penalty for short collection / non-collection of client margins                     | 30 days from end of quarter   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 39      | Net worth Certificate as per Computation prescribed by Dr. L.C. Gupta Committee Report.   | 60 days from end of quarter   | MSE/INSP/13570/2023 - Annexure A - Ref no. 9.1  |
| 40      | Reporting for Artificial Intelligence (AI) and Machine Learning (ML) applications and systems offered and used by market intermediaries             | Trading Members using Algorithm software - Half yearly basis within 15 calendar days of the expiry of the half year<br><br>Other Trading Members - Annually within 15 calendar days of the expiry of a year | SEBI circular ref. no. SEBI/HO/MIRSD/DOS2/CIR/P/2019/10 dated January 4, 2019 & Exchange Circular ref. no. MSE/MEM/14585/2023 dated December 13, 2023 |