

Central Depository Services (India) Limited

CDSL/RISK/DP/POLCY/2025/298

May 06, 2025

REPORTING OF ARTIFICIAL INTELLIGENCE (AI) AND MACHINE LEARNING (ML) APPLICATIONS AND SYSTEMS OFFERED AND USED BY MARKET INTERMEDIARIES

Attention of Depository Participants (DPs) is invited to CDSL Communique CDSL/RISK/DP/POLCY/2024/214 April 22, 2024, regarding Reporting for Artificial Intelligence (AI) and Machine Learning (ML) applications and systems wherein Registered DPs using AI and ML based application or system as defined in **Annexure B**, are required to fill in the form (**Annexure A**) and make submission to Depositories on annual basis within three months of the end of the financial year.

As per the communication received from SEBI, the frequency of submission of aforesaid report on AI and ML applications and systems has been changed from 'Quarterly' to 'Annually'. DPs are advised to take note of aforesaid change and submit the report on AI and ML applications and systems in the prescribed format (**Annexure A**) as per revised timelines mentioned below with immediate effect:

| Report | Current Timeline |
|--|----------------------------------|
| Depository Participants using AI and ML based | Annually, within three months of |
| application, or system as defined in Annexure B, are | the end of the financial year. |
| required to fill in the form (Annexure A). | |
| | |

Further, for applications and systems belonging but not limited to the categories of AI and ML technology, DPs may refer to Annexure B of the SEBI circular dated January 4, 2019.

The submission of the aforesaid AI and ML applications report is mandatory for all the DPs irrespective of whether they are using AI and ML systems or not. DPs not using AI and ML systems are required to submit NIL submission.

DPs are required to submit this report of AI and ML on CDSL's auditweb portal (https://auditweb.cdslindia.com) for the financial year ended March 31, 2025, onwards within three months of the end of the financial year.



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DPs are advised to take note of the above and ensure compliance.

Queries regarding this communiqué may be addressed to: CDSL on dpinfosec@cdslindia.com and connect through our IVR Number 022-62343333.

For and on behalf of Central Depository Services (India) Limited

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Prasad Chawathe Assistant Vice President - Information Security



Annexure A

Form to report on AI and ML Technologies

Intimation to Stock Exchange / Depository for the use of the AI and ML application and systems.

| SNo. | Head | Value |
|------|---|---|
| 1 | Entity SEBI registration number | |
| 2 | Registered entity category | |
| 3 | Entity name | |
| 4 | Entity PAN no. | |
| 5 | Application / System name | |
| 6 | Date from when the Application / System was used | |
| 7 | Type of area where AI or ML is used | <pre><order (please="" 256="" advisory="" aml="" characters)="" compliance="" execution="" in="" kyc="" others="" services="" specify="" surveillance=""></order></pre> |
| 7.a | Does the system involve order initiation, routing and execution? | <yes no=""></yes> |
| 7.b | Does the system fall under discretionary investment or Portfolio management activities? | <yes no=""></yes> |
| 7.c | Does the system disseminate investment or trading advice or strategies? | <yes no=""></yes> |
| 7.d | Is the application/system used in area of Cyber Security to detect attacks | <yes no=""></yes> |
| 7.e | What claims have been made regarding AI and ML Application / System – if any? | <free field="" text=""></free> |
| 8 | What is the name of the Tool / Technology that is categorized as AI and ML system / Application and submissions are declared vide this response | <free field="" text=""></free> |
| 9 | How was the AI or ML project implemented | <pre><internally a="" jointly="" or="" party="" provider="" solution="" third="" through="" with=""></internally></pre> |
| 10 | Are the key controls and control points in your Al or ML application or systems in accordance to circular of SEBI that mandate cyber security control requirements | <free field="" text=""></free> |
| 11 | Is the AI / ML system included in the system audit, if applicable? | <yes na="" no=""></yes> |
| 12 | Describe the application / system and how it uses AI / ML as portrayed in the product offering | <free field="" text=""></free> |
| 13 | What safeguards are in place to prevent abnormal behavior of the AI or ML application / System | <free field="" text=""></free> |



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Annexure B

Systems deemed to be based on AI and ML Technology

Applications and Systems belonging but not limited to following categories or a combination of these:

1. Natural Language Processing (NLP), sentiment analysis or text mining systems that gather intelligence from unstructured data. – In this case, Voice to text, text to intelligence systems in any natural language will be considered in scope. Eg: robo chat bots, big data intelligence gathering systems.

2. Neural Networks or a modified form of it. – In this case, any systems that uses a number of nodes (physical or software simulated nodes) mimicking natural neural networks of any scale, so as to carry out learning from previous firing of the nodes will be considered in scope. Eg: Recurrent Neural networks and Deep learning Neural Networks.

3. Machine learning through supervised, unsupervised learning or a combination of both. – In this case, any application or systems that carry out knowledge representation to form a knowledge base of domain, by learning and creating its outputs with real world input data and deciding future outputs based upon the knowledge base. Eg: System based on Decision tree, random forest, K mean, Markov decision process, Gradient boosting Algorithms.

4. A system that uses statistical heuristics method instead of procedural algorithms or the system / application applies clustering or categorization algorithms to categorize data without a predefined set of categories

5. A system that uses a feedback mechanism to improve its parameters and bases it subsequent execution steps on these parameters.

6. A system that does knowledge representation and maintains a knowledge base.
