



National Stock Exchange of India Limited

Circular

DEPARTMENT: INSPECTION						
Download Ref No: NSE/INSP/71800	Date: December 12, 2025					
Circular Ref. No: 73/2025						

To All Trading Members,

<u>Sub: Ease of Doing Compliance- Submission of Action Taken Report for non-compliance(s) reported in</u> the Internal Audit Report

This is with reference to Exchange Circular Ref. No. NSE/INSP/ 71579 dated December 1, 2025, on "Ease of Doing Compliance- Submission of Action Taken Report for non-compliance(s) reported in the Internal Audit Report".

In accordance with the aforesaid Circular, Trading Members are required to close all the non-compliances reported in the internal audit report within 2 months from the end of due date of submission of Internal Audit Report i.e., for the half year ended September 30, 2025, the due date for submission of Action Taken Report is January 31, 2026.

In this regard, detailed procedure for submission of Action Taken Report electronically through the Inspection module in the Member Portal under the Internal Audit Tab is attached as **Annexure A**.

Members are further advised to note that prescribed monetary penalty/disciplinary actions shall be initiated in accordance with Exchange Circular Ref. No. NSE/INSP/70746 dated October 10, 2025, in case the observations are not closed in the Action Taken Report or Action Taken Report is not submitted within the due date.

Further in cases where critical non-compliances viz; shortall of client funds/securities/commodities/ networth/incorrect reporting of networth to the Exchange resulting in shortfall/ not meeting the minimum networth criteria for providing margin trading facility wherein such shortalls are not recouped and offering fixed/assured/periodic returns to clients / mobilizing deposits from investors are reported in the internal audit report, immediate action shall be taken in accordance with Exchange Circular Ref. No. NSE/INSP/70746 dated October 10, 2025 without waiting for submission of Action Taken Report.



National Stock Exchange of India Limited

Members are requested to note that submission of Action Taken Report shall be considered complete only after Member submits the action taken report to the Exchange and receives an acknowledgment email. Action Taken Report saved in the system or submitted only by Auditor shall not be considered as final submission to Exchange.

All Trading Members are advised to take note of the above and bring the provisions of this Circular to the notice of their respective internal auditors and ensure compliance with the above requirement.

For and on behalf of National Stock Exchange of India Limited

Kapil Marwah
Associate Vice President

In case of any clarifications, Members may contact our below offices:

Regional Office	CONTACT NO.	E MAIL ID			
Ahmedabad (ARO)	079-65278024/55	inspectionahm@nse.co.in			
Chennai (CRO)	044- 66309915/17	inspection_cro@nse.co.in			
Delhi (DRO)	011-23459146/ 127/144/ 147	delhi_inspection@nse.co.in			
Kolkata (KRO)	033-40400412 / 59	inspection_kolkata@nse.co.in			
Mumbai (WRO)	022-61928200	compliance_wro@nse.co.in			
Central Help Desk	compliance_assistance@nse.co.in				

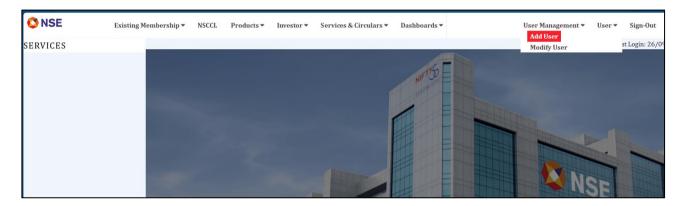
PART 1: MANUAL FOR SUBMISSION OF ACTION TAKEN REPORT (ATR) BY MEMBER

Step 1: Auditor Login Creation

- Member shall login into member portal (https://inspection.nseindia.com/MemberPortal/).
- For creating the login for the auditor who has submitted the Internal Audit Report for relevant half year, member shall assign the role of 'Internal Audit-ATR' to the existing user ID of Internal Auditor or alternatively create a new sub-user using below-mentioned steps for ATR submission. If member wants to create login for auditor (other than Internal Auditor as mentioned above), Member shall create new sub user from Member's ENIT admin login.

Steps for creation of auditor login:-

1. 1st login in Member's ENIT admin login. Right hand side under User Management click on 'Add User'.

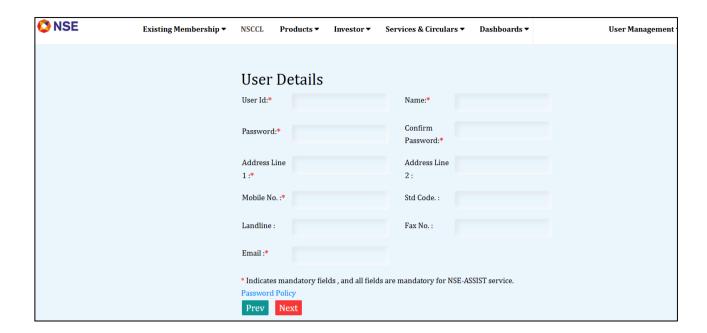


2. Select Sub user and click on Next button.

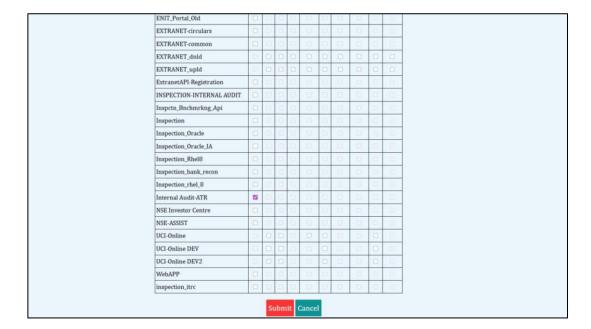


3. After filling the required details, click on Next.

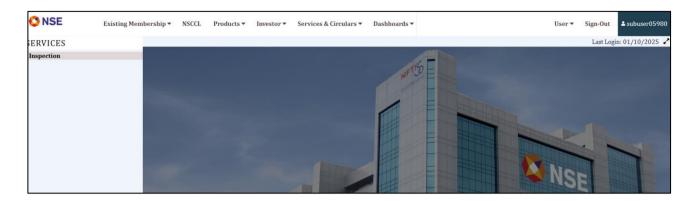
Note: User ID and Password should be same as entered in Auditor's Registration



4. Assign 'Internal Audit-ATR' role to the auditor and submit.



➤ For Auditor Registration, member shall login into Member portal using (https://inspection.nseindia.com/MemberPortal/) and below screen will be displayed and Select 'Inspection' tab.

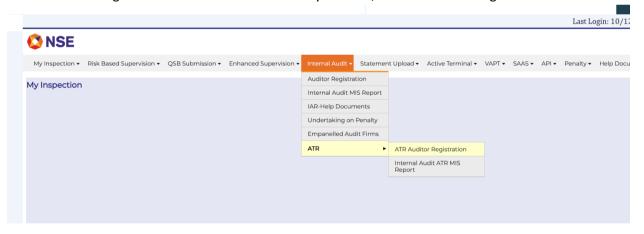


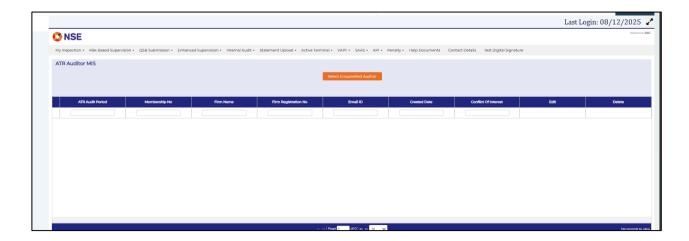
Step 2: Auditor Registration

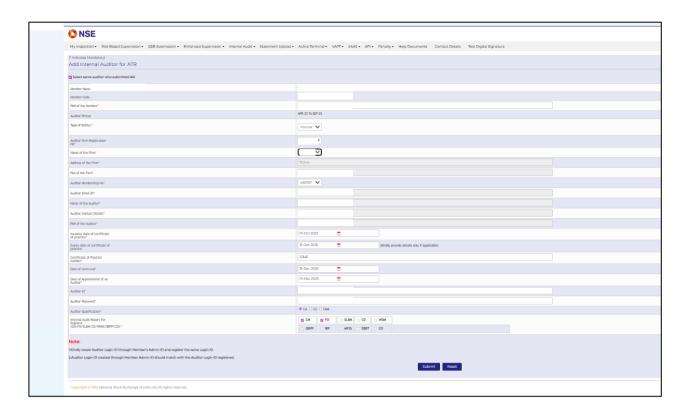
Members need to register their Auditor irrespective of auditor being a new/existing auditor. To do so, click on 'Internal Audit' tab and click on "ATR", "ATR Auditor Registration" from the dropdown available in the Internal Audit tab. Click on 'Select Empanelled Auditor' which allows members to add auditor with his details.

To select same auditor (who submitted internal audit report), select the checkbox 'select same auditor who submitted IAR', all the details will be auto populated, where member can edit few fields like 'Auditor ID', 'Auditor Password' details if necessary (update details in case of new sub-user); 'Date of Appointment', 'Date of Term End', etc.

After ensuring that all details have been correctly entered, click "Submit" to register the Auditor







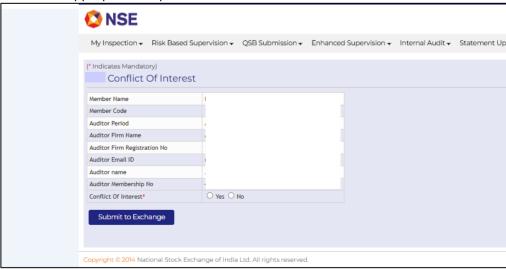
Note – Member needs to enter auditor's correct email id so that after submitting the above form, auditor will receive his login credentials on his/her E mail along with the URL.

Step 3: Conflict of Interest

After submission of 'Conflict of Interest' (COI) by Auditor, the Member will be able to submit it. Member shall access the 'ATR Auditor Registration'tab and click on the 'Conflict of Interest' button.

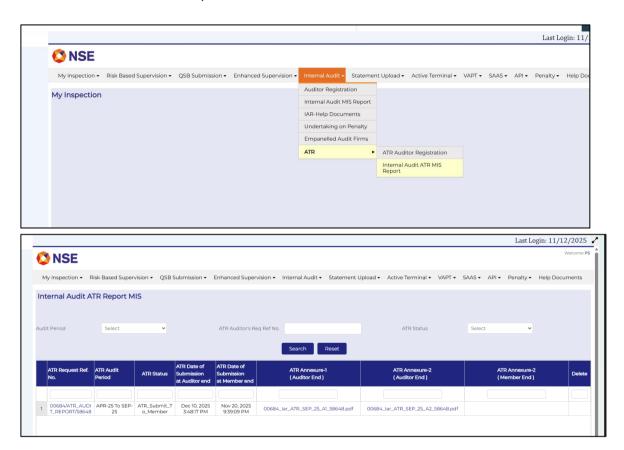


During submission of conflict of interest from member end, the following screen appears, and member shall submit the appropriate response.



Step 4: Action Taken Report Submission- Member End

- 1. Post COI submission, Auditor shall login to Auditor's login and process the Action Taken Report.
- 2. After submission of Action Taken Report by the Auditor, the Member can view the Audit report by accessing the 'ATR' in 'Internal Audit' tab in the Member login.
- 3. Under 'Internal Audit ATR MIS report' tab, Member shall select the period and click 'Search' button to view the ATR submitted by the Auditor.



4. To view the Audit report and submit the management comments, Member shall click the "Request reference no." against the current submission and the following page will be displayed.



- 5. The Member shall provide management comments for the non-complied clauses in ATR and indicate his acceptance (by selecting Y or N from the dropdown) for each compliance status marked by the Internal Auditor.
- 6. Member shall proceed to fill the required details and the click the "Submit" button

7. Upon proceeding, Member shall download the Action Taken Report (Annexure 2) available in PDF format.

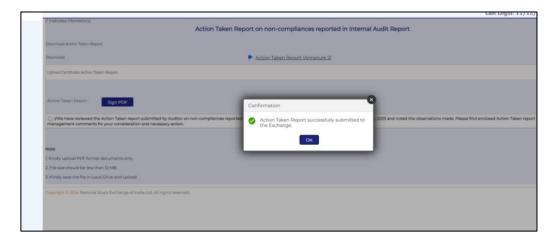


- 8. To digitally sign Action Taken Report, click on the 'Sign PDF'. Select the same PDF which was downloaded and digitally sign the same.
 - Signed PDF file will be generated in the signed file folder in the same path where original file is saved. Once all the files are signed, then the 'Choose File' button will appear to upload the signed files.



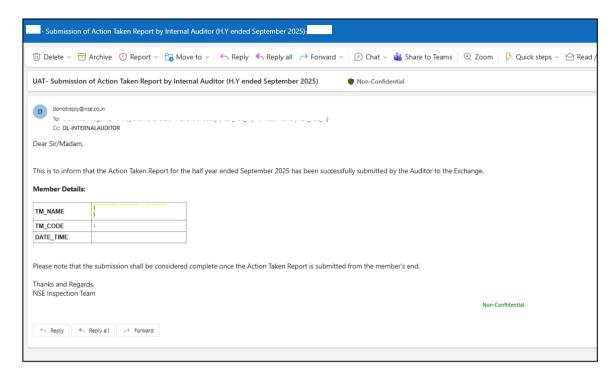
- 9. While uploading the Action Taken Report, member shall ensure the following:
 - ✓ File name should not be changed and should remain same as downloaded. Add '-signed' at the end of the PDF name generated for uploading files. Eg: 12345_Iar_ATR_SEP_25_A2_58643-signed
 - ✓ File size should be less than 10 MB.

Upload signed file of Action Taken Report and click submit. Once the files are submitted, the following screen shall be displayed.

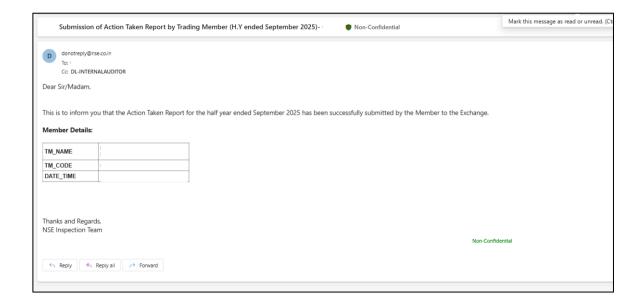


Step 5: Acknowledgement of Report Submission

Once the Action Taken Report is successfully submitted by the Auditor, an auto-generated email will be sent to both the Auditor and the Member. This email serves as a notification for the Member to complete their part of the submission process.



After submission of Action Taken Report by Member an auto-generated email will be sent to the Member.



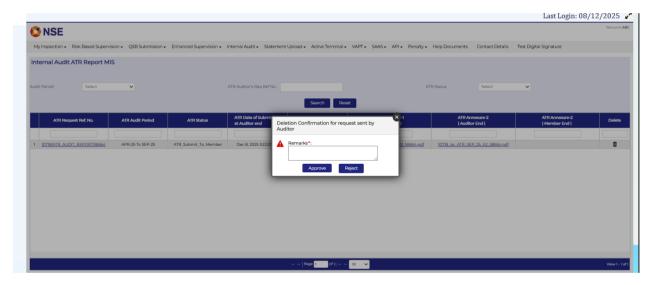
Step 6: Action Taken Report Deletion Functionality

- Action Taken Report can be deleted either by the Auditor or the Member, till the due date of submission.
- Deletion of Action Taken Report submitted by Auditor
 - a) The deletion request shall be sent from the Auditor login.
 - b) In the Auditor login, after entering the membership no. and Audit Period, the Auditor will be able to view the submitted report.



- c) As per the above screenshot, a deletion button has been made available. Auditor shall click on the icon, provide appropriate reasons for deletion of report and submit the request to the Member.
- d) To accept the deletion request, Member shall login to Member portal.

 Member shall click on Internal Audit tab then click on Internal Audit ATR Report MIS, where Member shall be able to view the deletion request. (As per screenshot below)



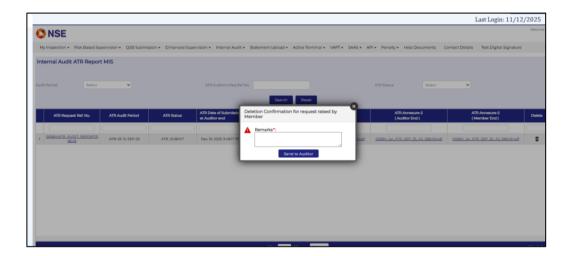
- e) Member shall click on delete icon (as highlighted above), provide appropriate reasons for deletion and delete the report.
- f) Once the report is deleted following screen will be displayed and report will be deleted successfully.



- Deletion of Action Taken Report submitted by Member
 - a) The deletion request shall be sent from the Member login.
 - b) In Internal Audit tab, click on Internal Audit ATR Report MIS then the following screen will be displayed.



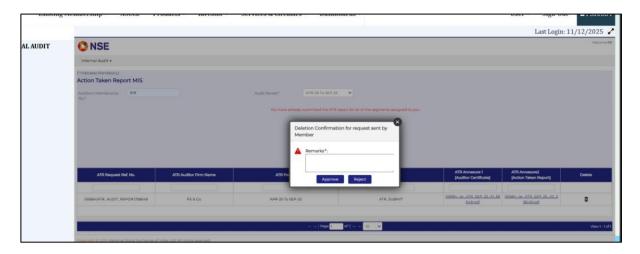
c) As per the above screenshot, a deletion button has been made available. Member shall click on the icon, provide appropriate reasons for deletion of report and submit the request to the Auditor.



- d) To accept the deletion request, Auditor shall login to Auditor portal.
- e) In the Auditor login, after entering the membership no. and Audit Period, the Auditor will be able to view the deletion request in a separate tab. (As per screenshot below)



f) Auditor shall click on delete icon (as highlighted above), provide appropriate reasons for deletion and delete the report.



g) Once the report is deleted following screen will be displayed and report will be deleted successfully.



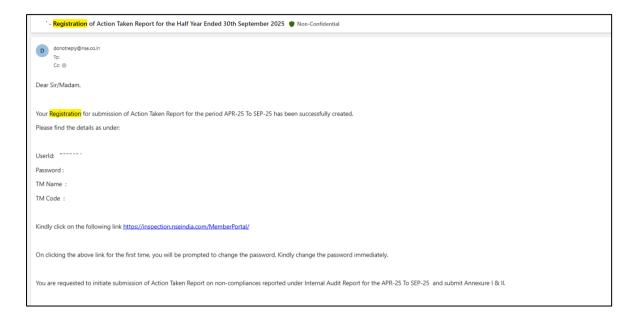
Note: Please note that if the Action Taken Report submitted by the member is deleted, the corresponding report submitted by the auditor will also be deleted.

END-

PART 2: MANUAL FOR SUBMISSION OF ACTION TAKEN REPORT (ATR) BY AUDITOR

Step 1: Auditor Registration:

- The Trading Member shall register the Auditor for ATR for the relevant half year through Member portal (Steps elaborated in ATR Manual for Member)
- Upon registration of Auditor by member, the Auditor shall receive the following e-mail on his registered E mail ID.



Step 2: Submission of Action Taken Report:

 Click on the link mentioned in the email and proceed with submission using login credentials mentioned in the Auditor registration email.

(https://inspection.nseindia.com/MemberPortal/)

2. Click on "Internal Audit - ATR" under Menu at the left-hand side, Action Taken Report MIS page will open.



3. In case, 'Internal Audit-ATR' right is given to the existing internal auditor, then auditor shall click on 'Internal Audit' (as per screenshot attached) and select 'Internal Audit-ATR' from the dropdown.



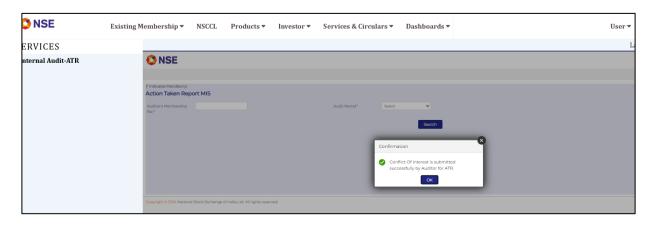
4. New auditor shall click on 'Internal Audit-ATR' and proceed.



5. Under Action Taken Report MIS – by entering Auditor Membership Number and Audit Period, Auditor shall click on search button the following screen will appear.



- 6. Auditor shall submit conflict of interest, subsequently to be submitted by Member to the Exchange from his login (First auditor then member)
- 7. Upon successful submission of 'Conflict of Interest' following is displayed.



- 8. Upon submission of 'Conflict of Interest' from member end, auditor shall proceed with the submission of Action Taken Report.
- 9. Auditor shall login into the portal using membership number and audit period.
- 10. Auditor shall be able to download the Internal Audit report submitted by the Internal Auditor and Trading Member for the relevant half year as shown in below screenshot.



- 11. All the non-compliances in the Internal Audit Report for the respective half year shall be populated in the Auditor login for ATR submission.
- 12. Auditor shall select current compliance status 'Non-Compliance' (NC)/ 'Complied' (C) for all the non-complied clauses reported in the Internal Audit Report
 - a) For NC points (including QSB violations wherever applicable), auditor shall provide remarks and, wherever applicable, include details such as the number of non-compliance instances, the percentage of non-compliance observed, and the value involved.
 - b) For NC points relating to point 9.M and 9.P regarding "Net worth", auditors are required to provide additional information

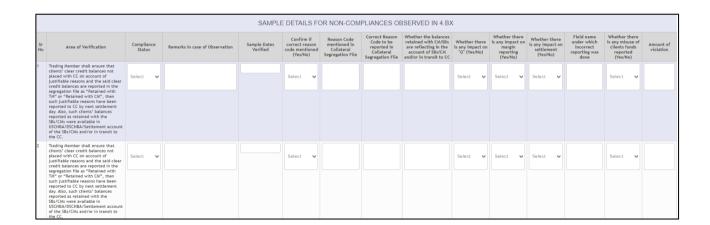


c) For points 4.AI, 4.BV and 4.BX (as per screenshots below) - in the format available on the Non-Compliance page.

In case the Auditor wants to add or delete dates (rows), please click 'Add Row' or 'Delete Row'.

	SAMPLE DETAILS FOR NON-COMPLIANCES OBSERVED IN 4.AI										
Sr No	Area of Verification	Compliance Status	Remarks in case of Observation	Date of Verification	ISIN	ISIN Name	Reporting done under Holding Submission to the Exchange	Reporting observed in Holding/DP statement	Difference	Value as on date	Whether any shortfall in securities (Yes/No)
1	Member has correctly reported to the Exchange the Securities holding balances for each of the DP account maintained by it. (Details of the difference between the acta and the reported data should clearly be brought out)	Select 🗸									Select 🗸
2	Member has correctly reported to the Exchange the Securities holding balances for each of the DP account maintained by it. (Details of the difference between the actual data and the reported data should clearly be brought out)	Select 🗸									Select 🗸
Add	d Row Delete Row						1				

	SAMPLE DETAILS FOR NON-COMPLIANCES OBSERVED IN 4.8V									
Sr No	Area of Verification	Compliance Status	Remarks in case of Observation	Sample Dates Verified	Whether there is any impact on "G" (Yes/No)	Whether there is any impact on margin reporting (Yes/No)	is any impact on	Field name under which incorrect reporting was done	Whether there is any misuse of clients funds reported (Yes/No)	Amount of violation
1	Member has correctly reported the data towards "Segregation and Monitoring of Collateral at Client Level" to their respective Clearing Member/Clearing corporation.	Select 🗸			Select 🗸	Select 🗸	Select 🗸		Select 🗸	
2	Member has correctly reported the data towards "Segregation and Monitoring of Collateral at Client Level" to their respective Clearing Member/Clearing corporation.	Select 🗸			Select 🗸	Select 🗸	Select 🗸		Select 🗸	
3	Member has correctly reported the data towards "Segregation and Monitoring of Collateral at Client Level" to their respective Clearing Member/Clearing corporation.	Select 🗸			Select 🗸	Select 🗸	Select 🗸		Select 🗸	



d) Auditor can use 'Save As Draft' functionality while submission of ATR.



13. Once the auditor enters all the details & submits it, he will get navigated to the next screen i.e. 'Action Taken Report' where Annexure 1 (ATR Certificate), Annexure 2 (Action Taken Report) will be generated through the system.

Note: Format of ATR Certificate is provided at the end of the document for reference.



14. To digitally sign Action Taken Report Certificate (Annexure 1), Action Taken Report (Annexure 2). Click on the 'Sign PDF'. Select the same PDF which was downloaded and digitally sign the same. Signed PDF file will be generated in the signed file folder in the same path where original file is saved. Once all the files are signed, then the 'Choose File' button will appear to upload the signed files.



- 15. While uploading the ATR Certificate (Annexure 1), ATR (Annexure 2), Auditor shall ensure the following:
 - ✓ File name should not be changed and should remain same as downloaded. Add '-signed' at the end of the PDF name generated for uploading files. Eg: 12345_Iar_ATR_SEP_25_A2_58643-signed File size should be less than 10 MB.

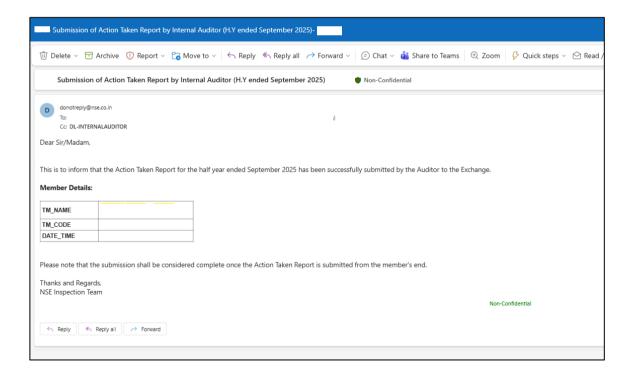
16. Upload signed file of Annexure 1 & Annexure 2 and click submit. Once the files are submitted, the following screen shall be displayed.



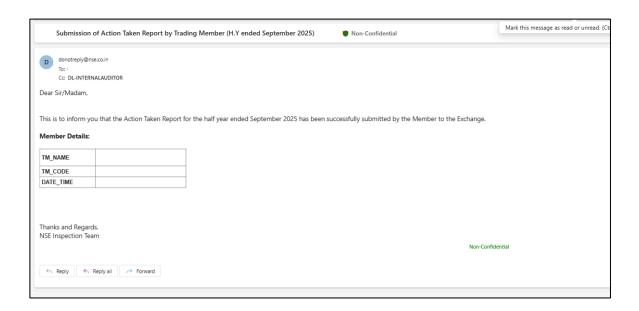
The format for the Reference no. is Member code/Audit Report/ reference no.

Step 3: Acknowledgement of Report Submission

➤ Once the Action Taken Report is successfully submitted by the Member, an auto-generated email will be sent to both the Auditor and the Member. This email serves as a notification for the Member to complete their part of the submission process.



> Similarly, after successful submission of Action Taken Report by Member an auto-generated email will be sent to the Member.



Step 4: Action Taken Report Deletion Functionality

Action Taken Report can be deleted either by the Auditor or the Member, till the due date of submission.

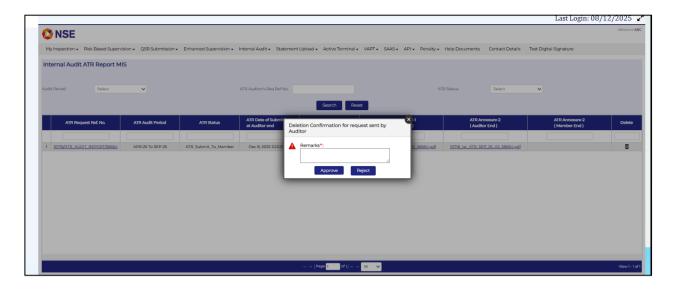
Deletion of Action Taken Report submitted by Auditor-

- 1. The deletion request shall be sent from the Auditor login.
- 2. In the Auditor login, after entering the membership no. and Audit Period, the Auditor will be able to view the submitted report.

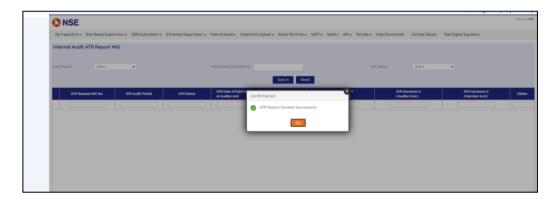


- 3. As per the above screenshot, a deletion button has been made available. Auditor shall click on the icon, provide appropriate reasons for deletion of report and submit the request to the Member.
- 4. To accept the deletion request, Member shall login to Member portal.

 Member shall click on Internal Audit tab then click on Internal Audit ATR Report MIS, where Member shall be able to view the deletion request. (As per screenshot below)



- 5. Member shall click on delete icon (as highlighted above), provide appropriate reasons for deletion and delete the report.
- 6. Once the report is deleted following screen will be displayed and report will be deleted successfully.

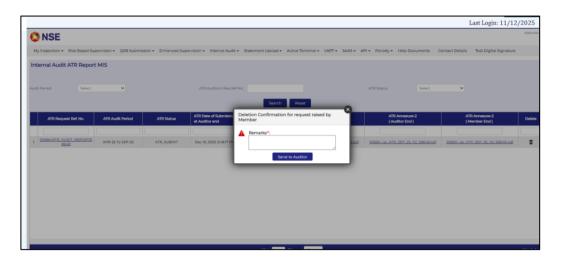


Deletion of Action Taken Report submitted by Member-

- 1. The deletion request shall be sent from the Member login.
- 2. In Internal Audit tab, click on Internal Audit ATR Report MIS then the following screen will be displayed.



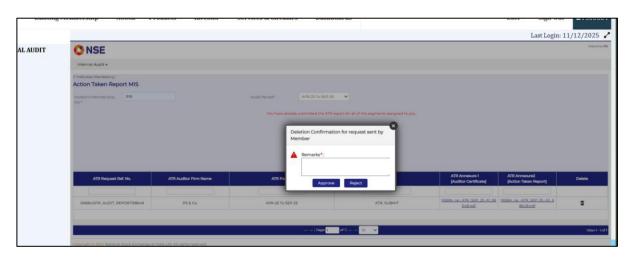
3. As per the above screenshot, a deletion button has been made available. Member shall click on the icon, provide appropriate reasons for deletion of report and submit the request to the Auditor.



- 4. To accept the deletion request, Auditor shall login to Auditor portal.
- 5. In the Auditor login, after entering the membership no. and Audit Period, the Auditor will be able to view the deletion request in a separate tab. (As per screenshot below)



6. Auditor shall click on delete icon (as highlighted above), provide appropriate reasons for deletion and delete the report.



7. Once the report is deleted following screen will be displayed and report will be deleted successfully.



Note: Please note that if the Action Taken Report submitted by the member is deleted, the corresponding report submitted by the auditor will also be deleted.

CERTIFICATE ON ACTION TAKEN FOR NON-COMPLIANCES REPORTED IN INTERNAL AUDIT

W	We have examined the relevant books of accounts, records and documents maintained by M/s.							
		trading member) bearing SEB	I registration					
n	umber) a member of the Na	ational Stock					
E	xchange of India Limited for the following segr	nents to verify and certify the c	ompliance on					
a	action taken by the Member for the non-compliances reported in the internal audit report for							
tł	the half year ended .							
	Segment	Activity - Trading	SEBI					
	(Capital Market / Equity Derivatives Segment		registration					
	/ Debt Segment /Currency		number					
	Derivatives/Securities Lending & Borrowing							
	segment/Commodity Derivative							
	Segment)							

The purpose of this Audit is to examine that the processes, procedures followed, and the operations carried out by the Trading Member are as per the applicable Acts, Rules, Regulations, Bye-laws and Circulars prescribed by SEBI and the Stock Exchange.

We have obtained all the information and explanations, 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 been maintained by the Member, so far as it appears from examination of the books.

Based on the scrutiny of relevant books of accounts, records and documents, and to the best of our knowledge and explanations given to us, we certify that the Member hascomplied with the relevant provisions of SEBI Act, 1992, Securities Contracts (Regulation) Act 1956, Securities Contracts (Regulation) Rules 1957, SEBI (Stock Brokers) Regulations, 1992 and various circulars of SEBI and with the Rules, Bye laws, Regulations of NSEIL and various circulars issued by the Stock Exchange except otherwise mentioned in the Annexure to this report.

We declare that the audit firm meets the eligibility criteria as prescribed vide Annexure A of Exchange Circular no. NSE/INSP/58709 dated September 29, 2023.

Further, we declare that we do not have any direct / indirect interest in or relationship with the member or its shareholders / directors / partners / proprietors / management, other than the proposed audit assignment and also confirm that we do not perceive any conflict of interest in such relationship / interest while verifying non-compliances reported in internal audit of the said member.

In our opinion and to the best of our information and according to the explanations given to us by the proprietor/partners/directors/compliance officer, the Action Taken Report provided by usas per the Annexure and subject to our observations, which covers the entire scope of the audit, is true and correct.

Company Secretary / Cost and Management Accountant / Chartered Accountant(Seal & Signature)

(Name of the Partner)

Membership no. / CP. No.

UDIN No.

Place: -Date: -