Circular no.: MCX/INSP/650/2025 December 19, 2025

Ease of Doing Compliance- Submission of Action Taken Report (ATR) for non-compliance(s) reported in the Internal Audit Report

This is with reference to Exchange Circular no. MCX/INSP/622/2025 dated December 02, 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 Member Portal and format of Audit Certificate for Action Taken Report are applicable for the submission of Action Taken Report for the half year ended September 30, 2025.

Please find enclosed the following Annexures applicable for the submission of Action Taken Report for the half year ended September 30, 2025:

- **Annexure I** - Help file for submission of Action Taken Report electronically through the Member Portal.

- **Annexure II**- Auditor Certificate for Action Taken Report.

Members are further advised to note that prescribed monetary penalty/disciplinary actions shall be initiated in accordance with Exchange Circular no. MCX/INSP/525/2025 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.

As per the Exchange Circular no. MCX/INSP/356/2025 dated July 24, 2025 all 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 no. MCX/INSP/525/2025 dated October 10, 2025 without waiting for submission of Action Taken Report.

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 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 of the above requirement.

Baiju Budhwani
Head of Department
(Inspection and Enforcement)

Encl. Annexure I & II

Kindly contact Inspection & Enforcement Team on 022-66494040 or send an email at customersupport@mcxindia.com and inspection@mcxindia.com for further clarification.

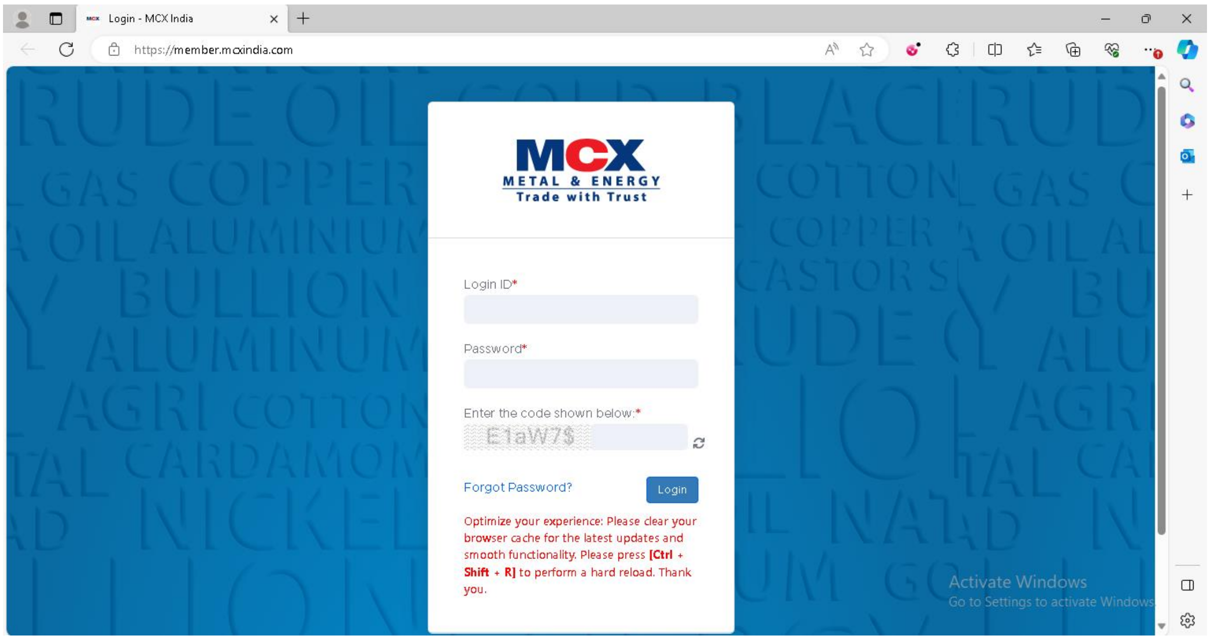
Annexure-I

HELP FILE FOR SUBMISSION OF ACTION TAKEN REPORT (ATR) ELECTRONICALLY THROUGH THE MEMBER PORTAL

I : Member login and Creation of Auditor User ID

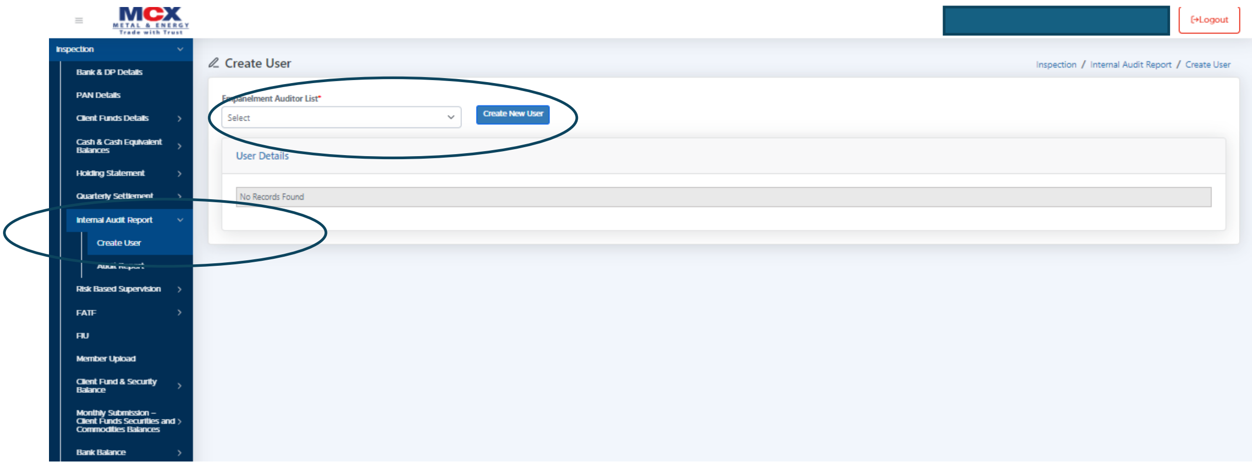
Step 1: Please login to Member Portal at https://member.mcxindia.com, using your login credentials. (In case you forgot your password, please enter Login ID then enter code and click "Reset Password" button. Reset Password link will be sent to your registered email ID.)

Screen will appear as below:



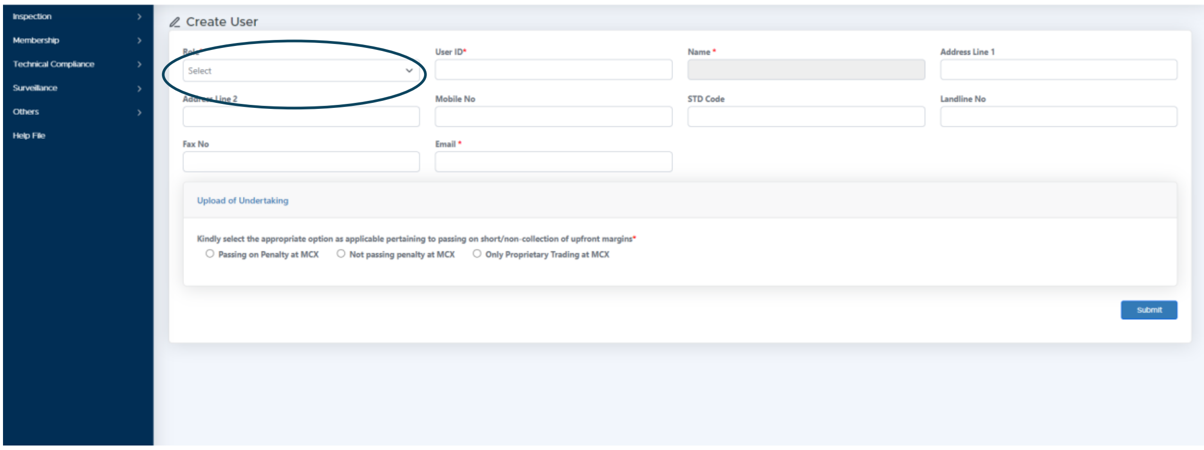
Step 2: When member logs in, the following screen will appear along with the **"Inspection Tab"** at the left side.

Click on the Inspection Tab →→→ Internal Audit Report →→→ Create User (for appointment of Internal Auditor for submission of ATR) as shown below.



Step 3: Member needs to select the list of Audit Firms from the Empanelled Auditor List as displayed above **(Audit Firms will be visible in drop down alphabetically in ascending order)**

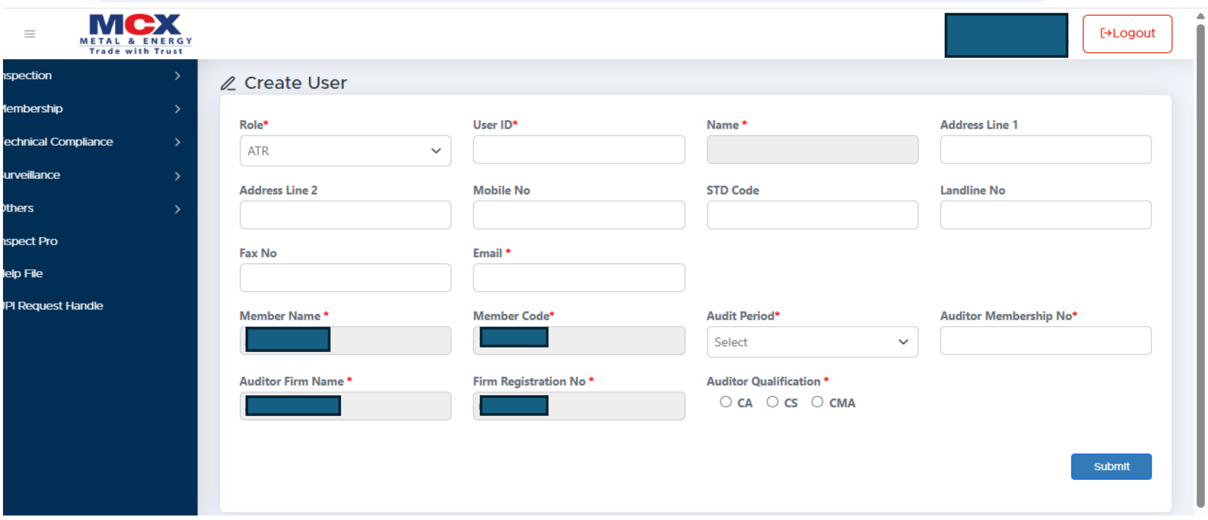
Once Audit firm is selected and member clicks **"create user"**, following screen appears.



In the Role Field, there are 3 options in drop down.

- ✓ Member Operator **(KINDLY IGNORE THIS OPTION)**
- ✓ Internal Auditor
- ✓ ATR Auditor

For appointment of Internal Auditor for ATR, please select option **"ATR Auditor"** from the drop down. Once member selects the Internal Auditor option, following screen will appear.

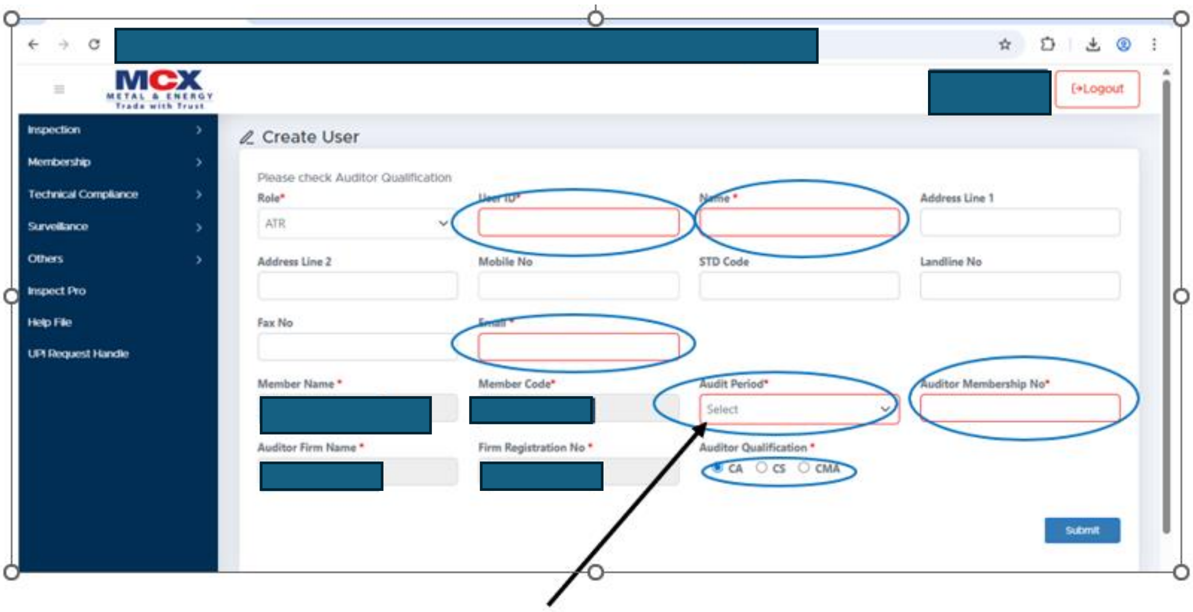


The mentioned screen will appear with prefilled details highlighted above. These prefilled details cannot be edited by the member. (Member Name, Member Code, Audit Firm Name and Firm Registration No).

Step 4: Please enter data in the fields above.

In case of User ID – It is advisable to use member name as a prefix to User ID. For instance, ABC_AUDITOR, XYZ_AUDITOR, etc. **Avoid using standard nomenclature like AUDITOR, INTERNALAUDITOR, INTERNALAUDIT, INTAUDITOR, etc. Member shall not enter its Member ID in this field.**

In case of email ID - Kindly note that member must enter the correct Email ID of the auditor appointed, in the Email ID field since internal auditor would receive the email once member submits the details for appointment.



Kindly note that ATR Audit period will be reflected after selecting drop down tab.

Ensure that **all mandatory fields are filled** in order to submit the details successfully.

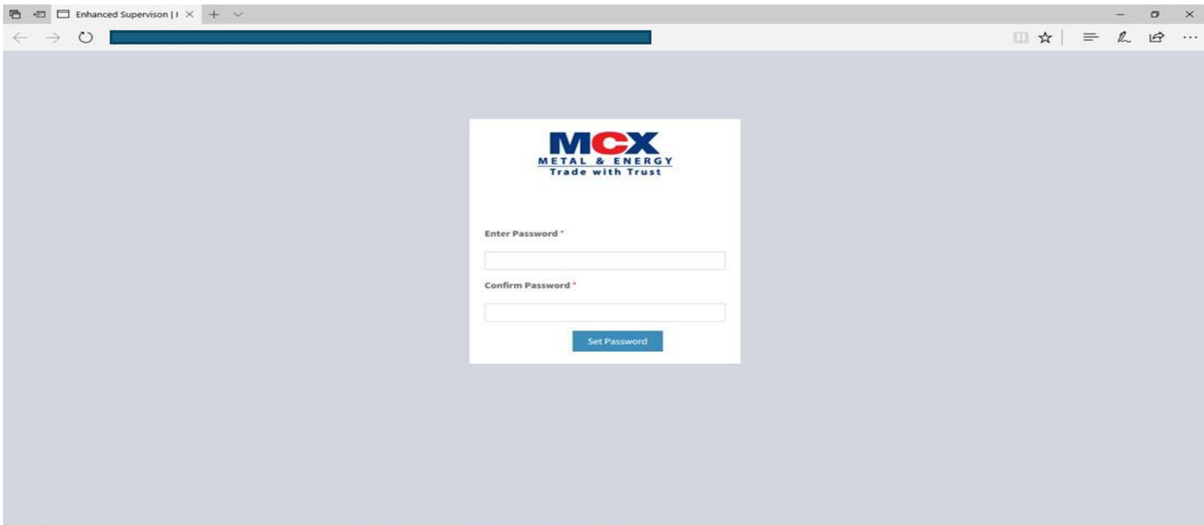
Once all details are submitted, screen shall display a message stating “Record saved successfully”.

Step 5: Now, auditor will receive an email, as shown below containing user ID created by member with a link to set password and a link (URL) for accessing the Internal Audit Portal for submission of Action Taken Report and Internal Audit Certificate.

> Dear (Internal Auditor Name),
>
> Your user has been created in Enhanced Supervision.
> Please log in using the below Account Information
>
> **User id:** (As mentioned by member)
>
> Click on the link Set Password to set your password.
>
> Please go to the link provided below for submitting the ATR.
>
> https://member.mcxindia.com
>
> Regards,
> (Member Name)

Kindly note that User ID is case sensitive. (It is advisable to confirm receipt of appointment email from the auditor)

Step 6: Auditor is required to set the password by clicking the [Set Password] link provided in the email as display in above screen. Once auditor clicks the link, below screen appears.

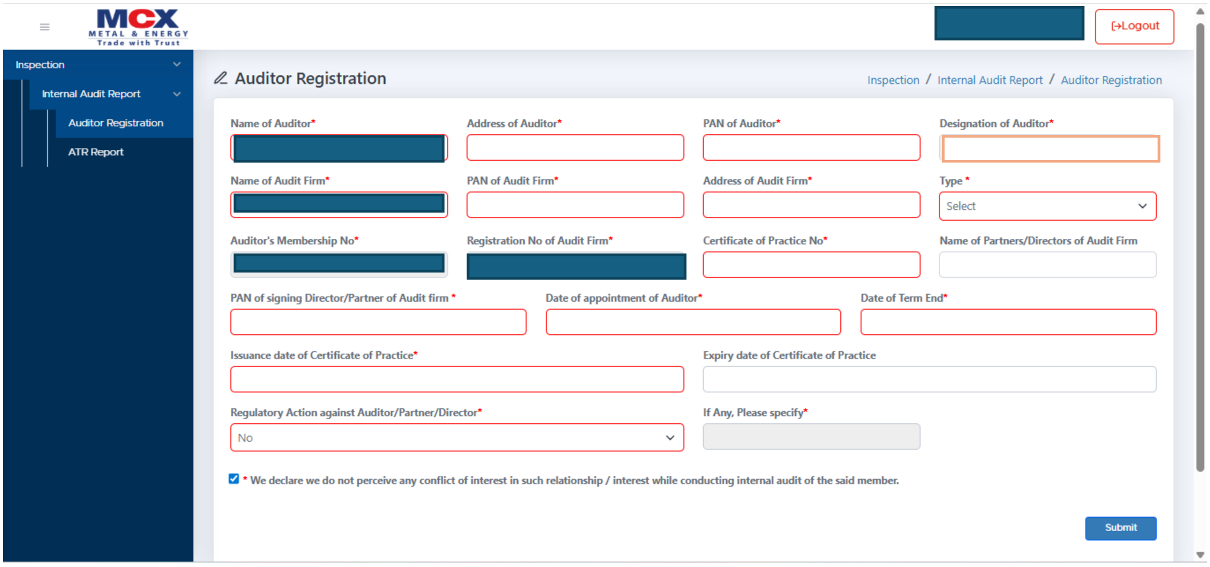


Set the password and login into the portal using the link https://member.mcxindia.com

User ID is mentioned in the email received by auditor as mentioned in Step 5.

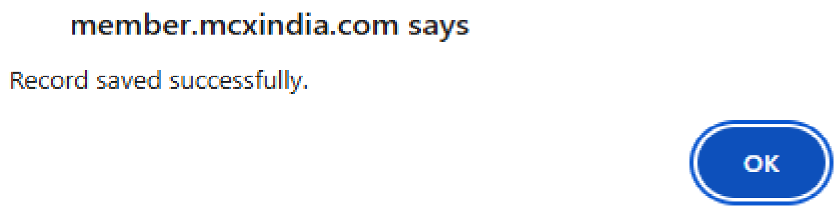
II : Auditor Registration process and Initiation of ATR

Step 7: After login, following screen will appear. Auditor is required to fill first auditor registration details.

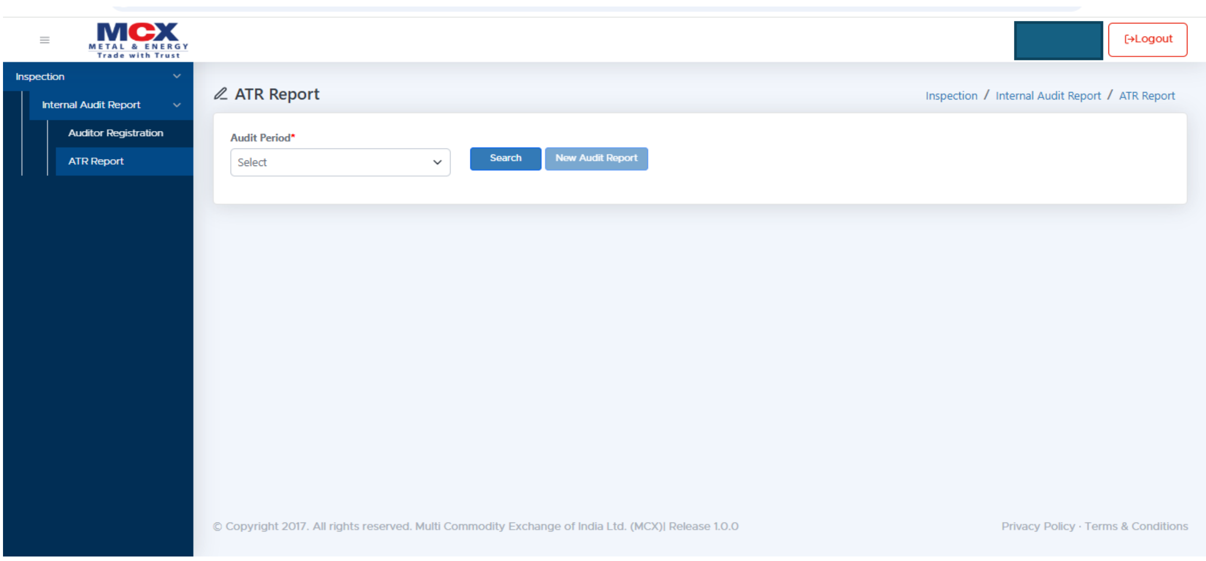


Name of Auditor, Auditor Firm, Auditor's Membership No and Registration No of the Audit Firm will be prefilled. **(Data will auto-populate from User ID created by the Member).** Enter the required details on the screen and submit. Kindly note that details entered on this screen cannot be resubmitted. Hence ensure that correct data is entered. Any erroneous entry saved needs to be informed to the Exchange by the Member immediately.

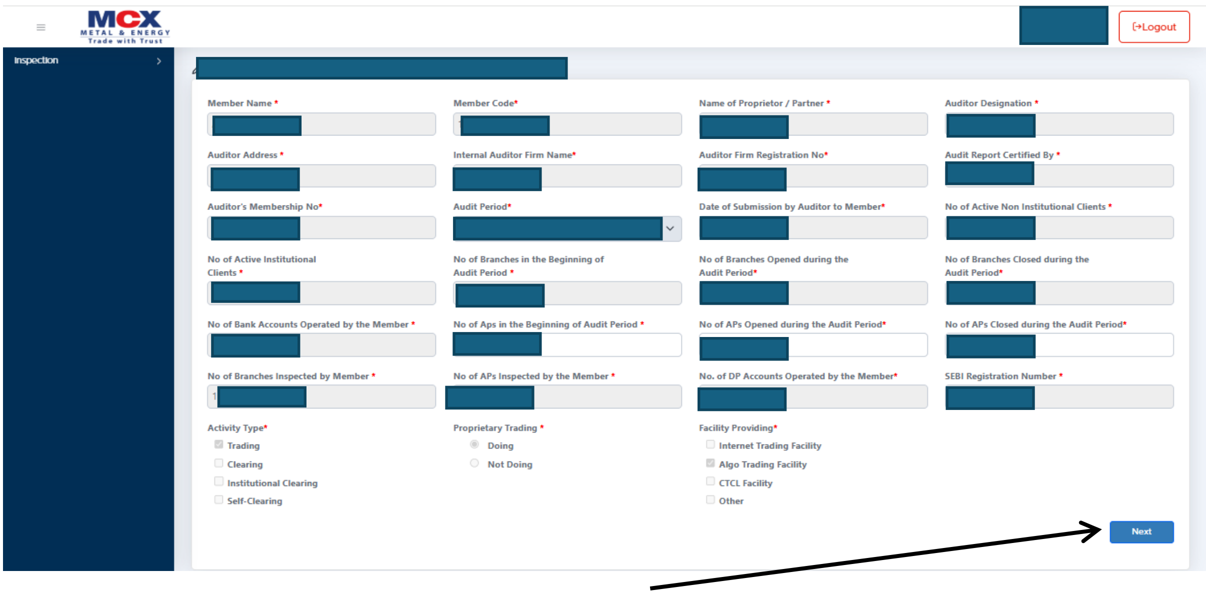
Once the details are submitted, screen shows below message “Record Saved Successfully”.



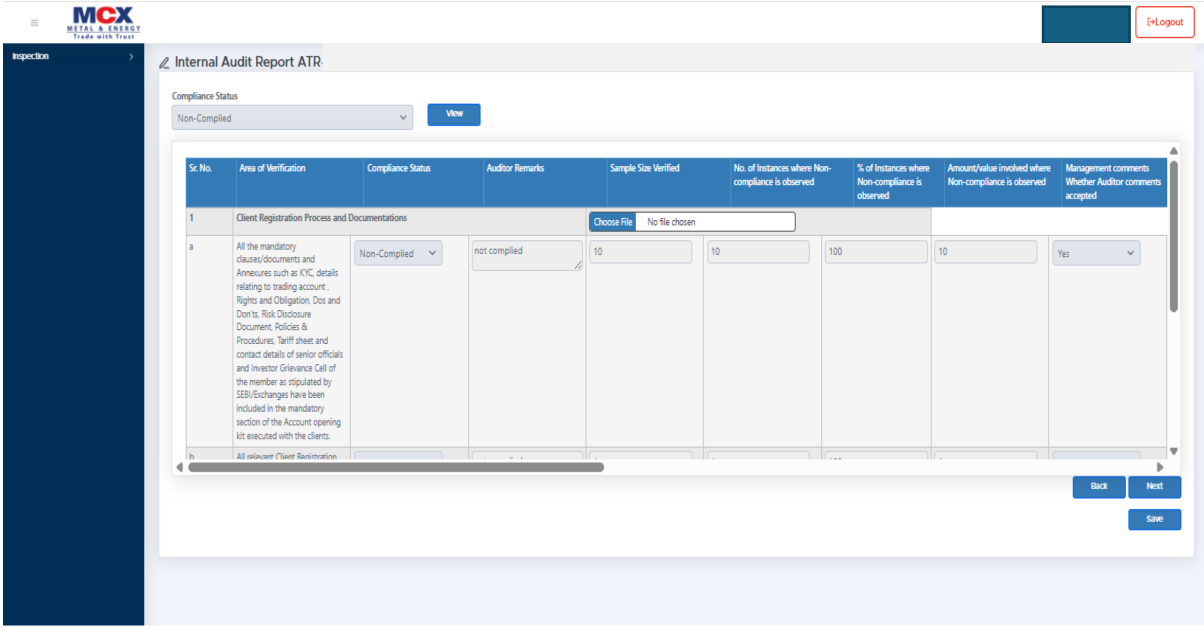
Step 8: After submitting the details, following screen is displayed after selecting ATR Report.

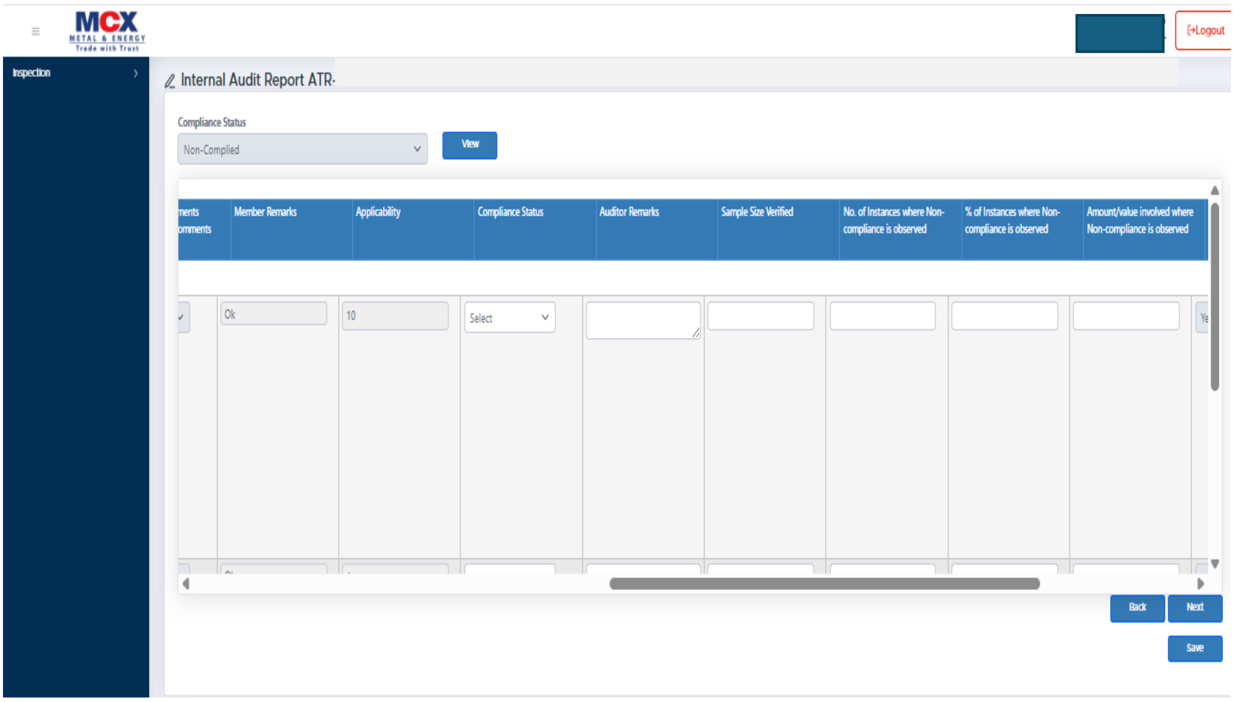


Select the audit period from drop down as applicable (which is eligible for ATR) and click Search. Once auditor clicks search, **“New Audit Report”** button gets activated and below editable screen will be displayed :



After verifying the above details, select “Next” to navigate to the below screen which displays, Area of Verification, Compliance Status, Auditor Remarks, Sample Size Verified non-complied, Compliance Status, Auditor Remarks, Sample Size Verified, No. of Instances where Non-Compliance is observed, % of Instances where Non-Compliance is observed, Amount/value involved where Non-compliance is observed etc.

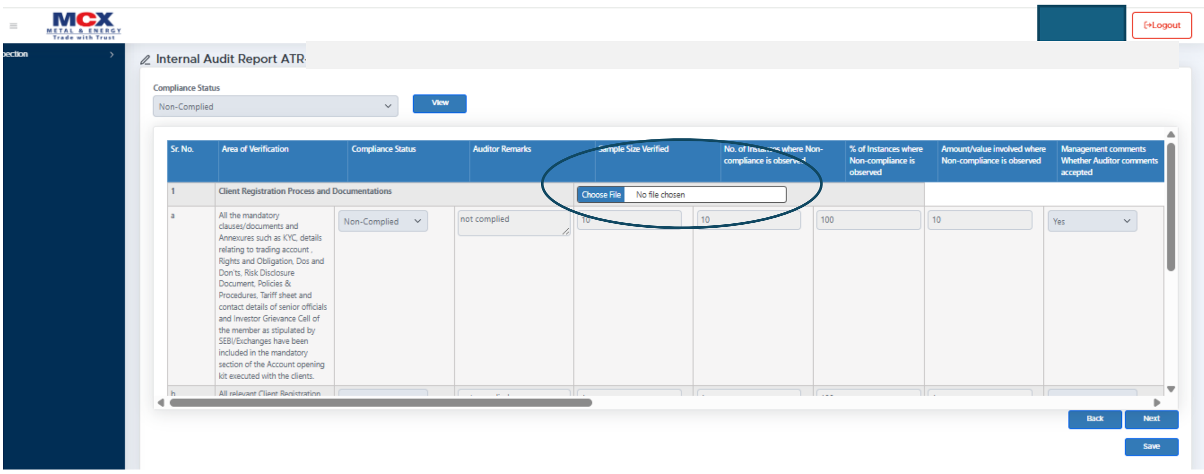




Note :

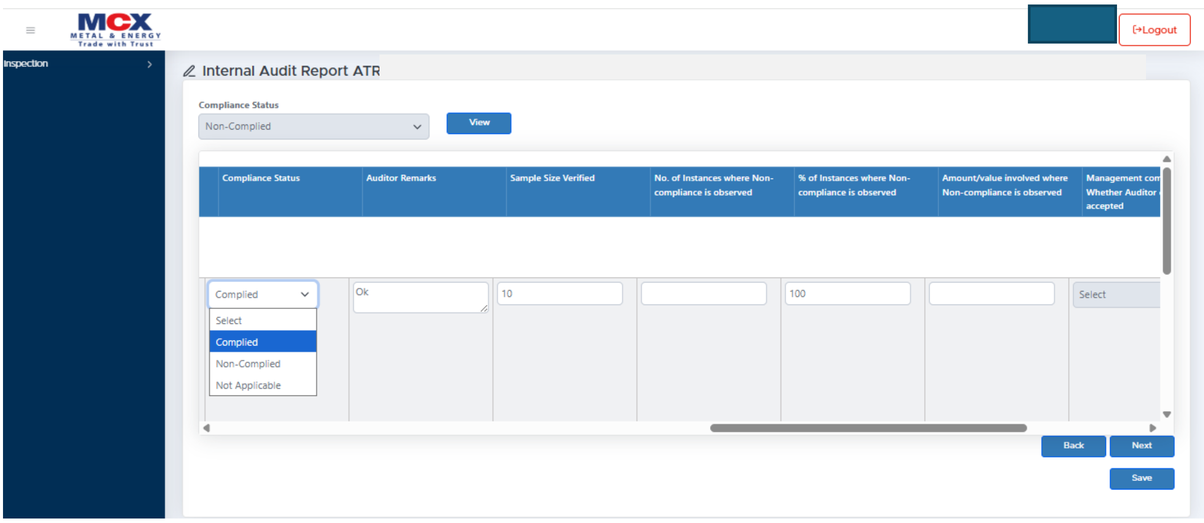
1. *Auditor remarks are mandatory in both the cases, wherein checkpoint is marked as either 'Complied' or 'Not-complied'.*
2. *Sample size verified is mandatory field.*
3. *No. of instances is mandatory, in case if checkpoint is marked as 'Not-complied'.*
4. *'% of Instances' or 'Amount/Value' either of the one is mandatory in case if checkpoint marked as 'Not-complied'*

Kindly note that as per Exchange Circular no.: MCX/INSP/622/2025 dated December 02, 2025 Action Taken Report shall be certified by the empanelled Internal Auditor of the Trading Member, confirming the status of compliance and shall cover at least a period of one month for sample verification. All the working papers and records with respect to the Audit should be uploaded in below tab:-



Kindly note :- (Allowable file type is PDF, WORD, EXCEL in ZIP format (Maximum file size should not exceed 10 MB per head).

In case of non-compliance reported by internal auditor in the QSB report (Annexure-VIII of Internal Audit Report), Auditor shall upload sample pertaining to QSB-report.



Step 9: Submission of Checklist

Auditor shall follow the below guidelines to update the checklist in correct manner:

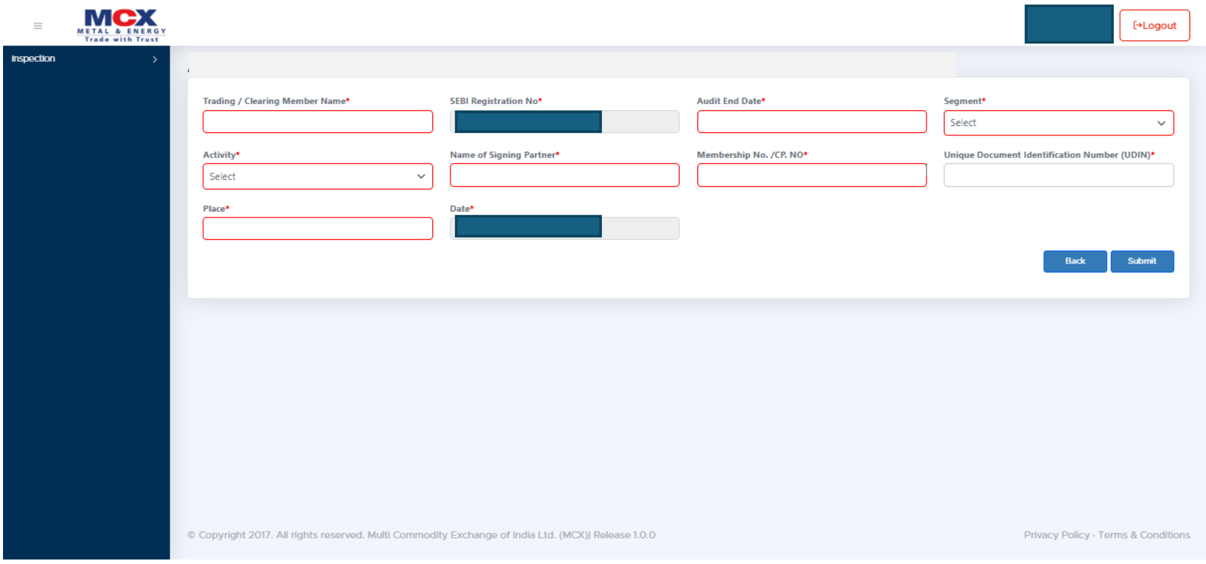
In ATR submission Auditor is required to update 6 columns in the checklist i.e.

Column A	**Compliance Status**
Column B	**Auditor Remarks**
Column C	**Sample Size Verified**

Column D	**No. of instances where Non-Compliance is observed**
Column E	**% of instances where Non-Compliance is observed**
Column F	**Amount/Value involved where Non-Compliance is observed**

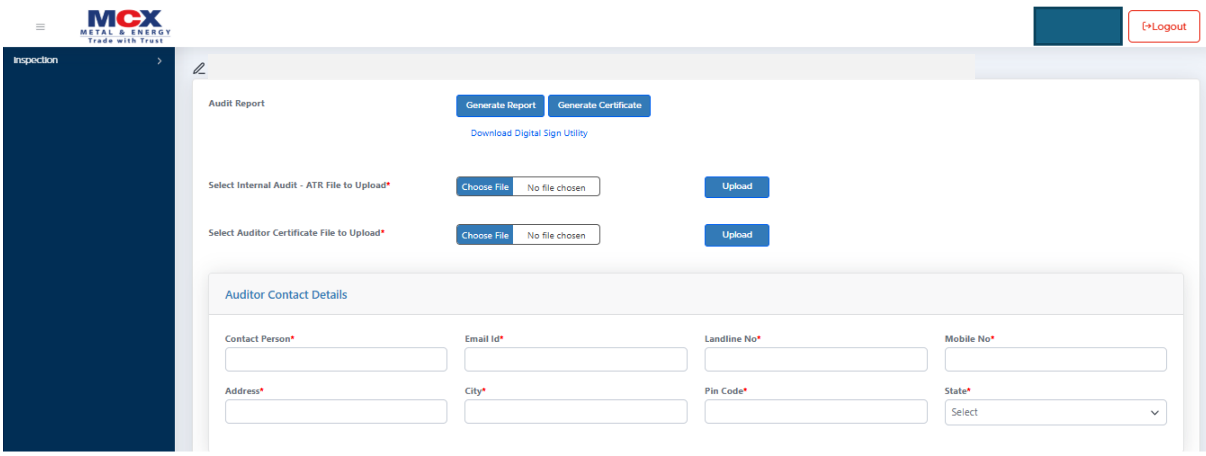
Auditor shall not enter any data in Management comments, whether Auditor comments accepted and 'Member Remarks' since these columns are to be updated by Member once Auditor submits the digitally signed report and certificate to the member.

Step 10: Once the auditor updates the checklist (in manner specified in Step 9 above), below screen will be appear



All mandatory details are required to submit by auditor except SEBI registration no. and date, shall be reflected from the system.

Step 11 : After click on Submit tab below screen will be displayed:



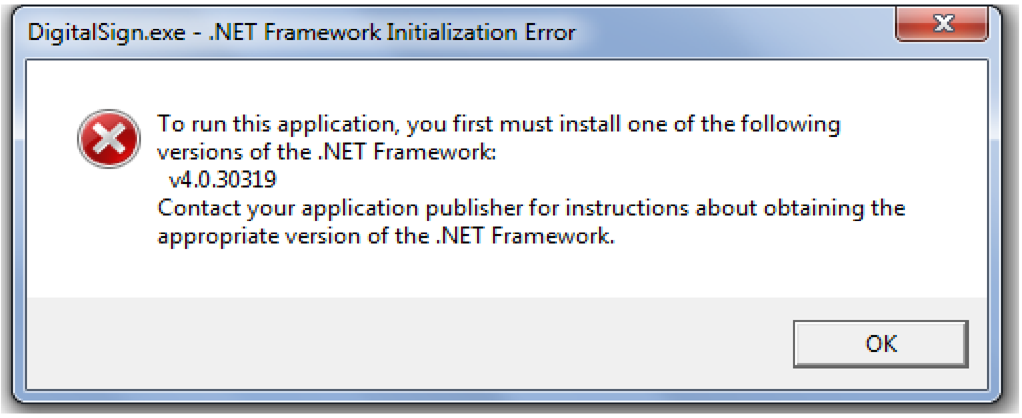
Auditor is required to generate Internal Audit-ATR by using "Generate Report" button. In same manner, generate Internal Audit Certificate by using "Generate Certificate" button. Both the PDF documents would be downloaded. Save the files (if not automatically saved.)

Now, auditor needs to download the Digital Signature Utility by using the link as shown in screen below :

Kindly note that Digital Signature utility works in Dot Net framework 4.0.

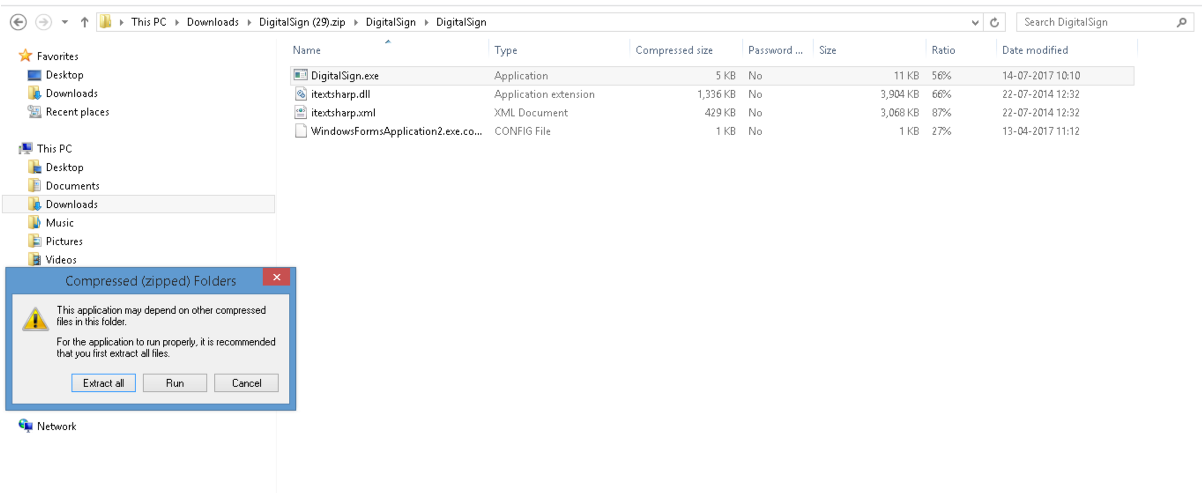
Digital Signature to be used for signing the PDF document should be class 2 signature.

Users need to install Dot Net framework 4.0 to run the same. If members don't have this framework installed on system, they may get an error message as shown below.

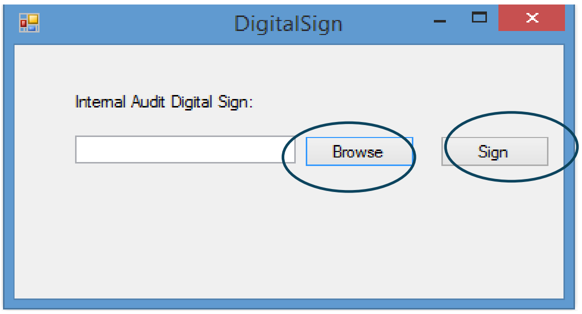


Step 12: Once Auditor clicks the link, zip file is downloaded. Now please follow these steps in order to digitally sign the **Internal Audit File-ATR** and Internal **Audit certificate** PDF Files generated.

- ✓ Insert your Digital Signature USB Dongle in the system
- ✓ **Extract the Zip File to a separate folder**. Once zip file is extracted, following files will be visible in extracted folder as shown in below screen.
- ✓ Run "DigitalSign.exe" file.



Once Auditor runs the "DigitalSign.exe" application as explained above, pop up message box would appear on the screen as shown below.



- ✓ Select File **(Please ensure that file is not opened in the background otherwise digital sign may not work)** and click the Sign button as shown in screen above.
- ✓ System will ask for digital signature password.
- ✓ Once password is entered, message comes “File Signed Successfully”

Step 13: Once all the PDF files are digitally signed successfully **(auditor is advised to check the last page of the Internal Audit-ATR File and certificate to ensure that the document is digitally signed)**, upload the digitally signed documents by using the choose file button and then upload button.

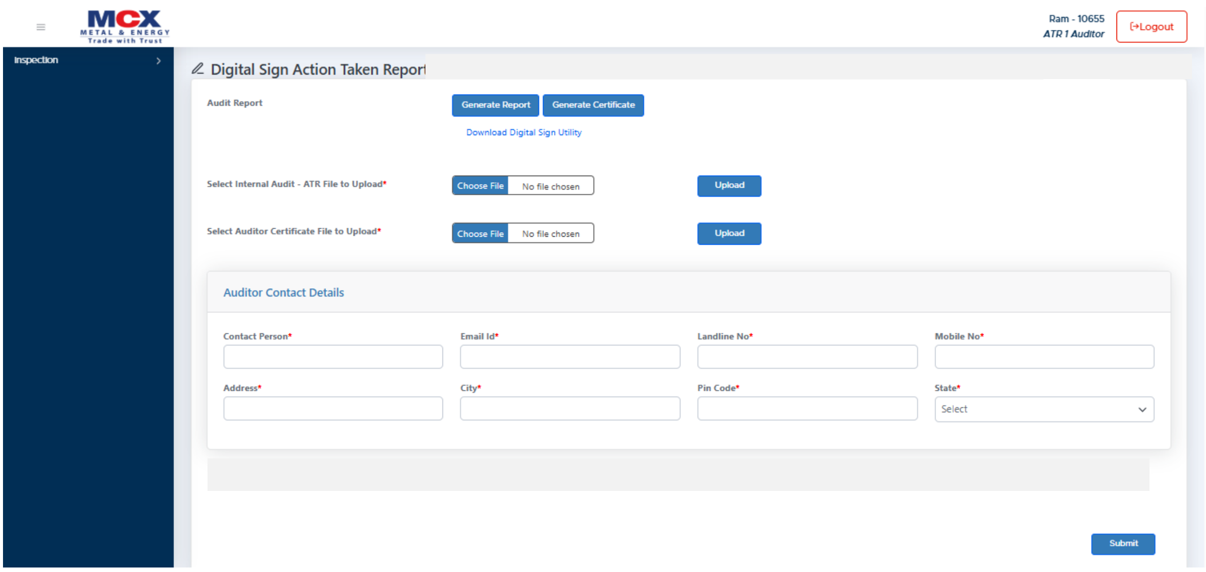
AUDITOR SHALL ENSURE THAT HE HAS CORRECTLY UPLOADED ALL FILES:-

- **INTERNAL AUDIT ATR FILE AND**
- **AUDITOR CERTIFICATE**

IN THE RESPECTIVE LINKS AS PROVIDED IN THE BELOW SCREEN

Once all the documents are uploaded, system will show message “File uploaded successfully”

After uploading all the document, enter the “Auditor Contact Details” in the fields below and tick the check box as shown in below screen.



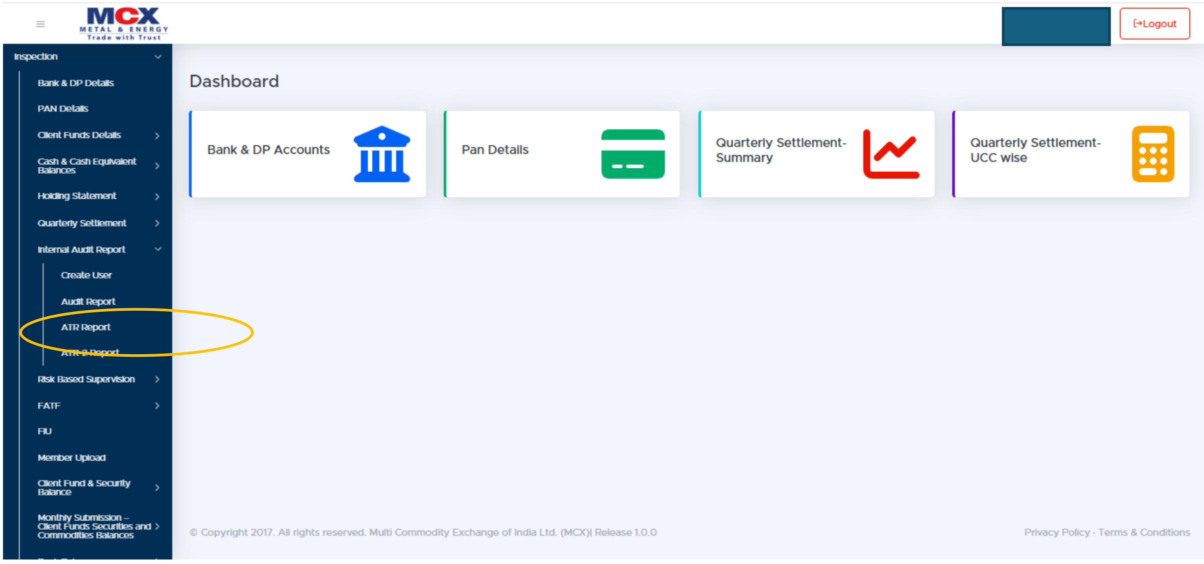
Now click “Submit” button at the bottom of the screen.

Step 14: Internal auditor can check the documents submitted through Inspection →→→ Internal Audit Report →→→ ATR Report →→→ Select the period from drop down →→→ Click Search. Auditor can see additional following files:

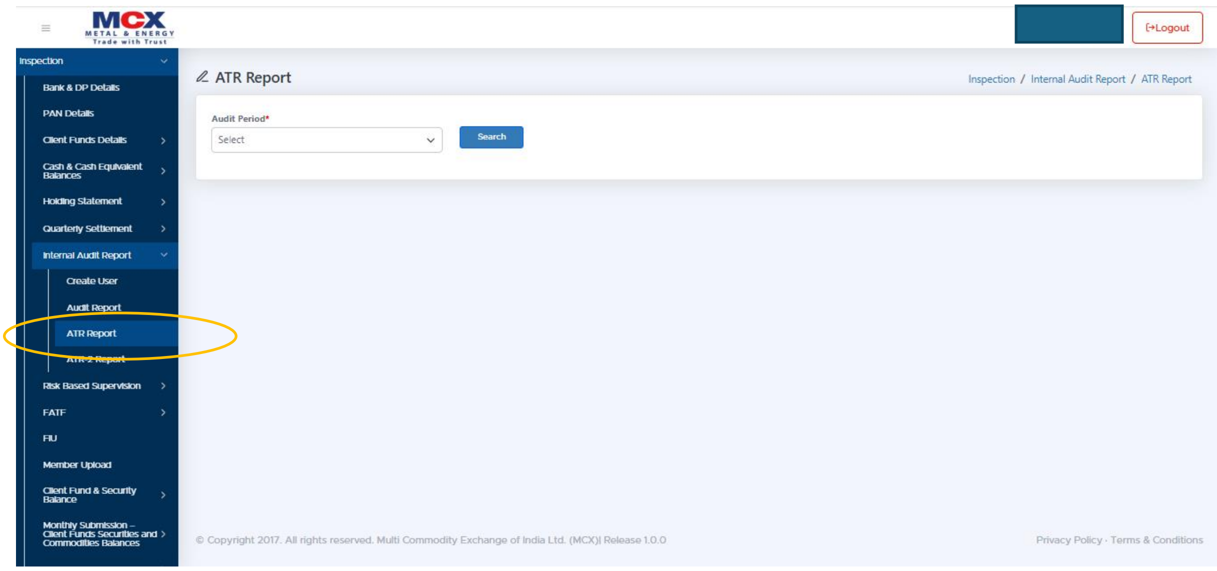
- ✓ **Audit Report-ATR :** Action Taken Report (PDF Document) Digitally Signed by Internal Auditor.
- ✓ **Audit Certificate:** ATR Certificate (PDF Document) Digitally Signed by Internal Auditor
- ✓ **Sample uploaded by ATR Auditor (ZIP Document)**
- ✓ **Action Taken Report (Excel) (ATR):** Action Taken Report in Excel Format.

III : SUBMISSION OF INTERNAL AUDIT-ACTION TAKEN REPORT WITH MANAGEMENT COMMENTS & REMARKS

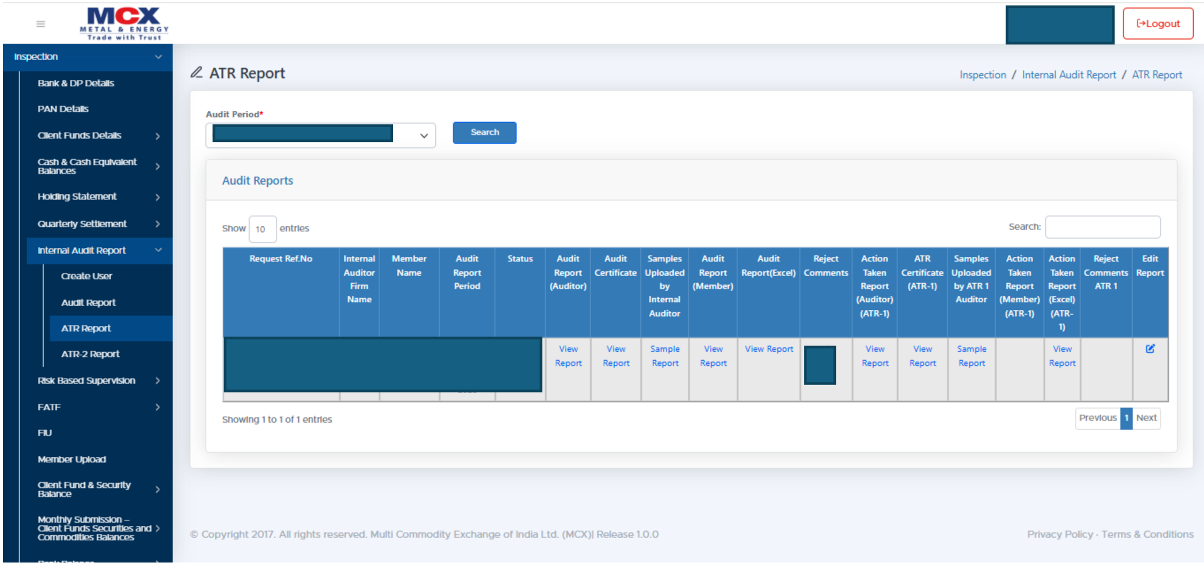
Step 15: ATR submission in Member login



Step 16 : After selecting ATR Report option in the Internal Audit Report tab, below screen will be displayed.



Step 17: Select the audit period from drop down and click Search. After clicking search button, following screen will be displayed.

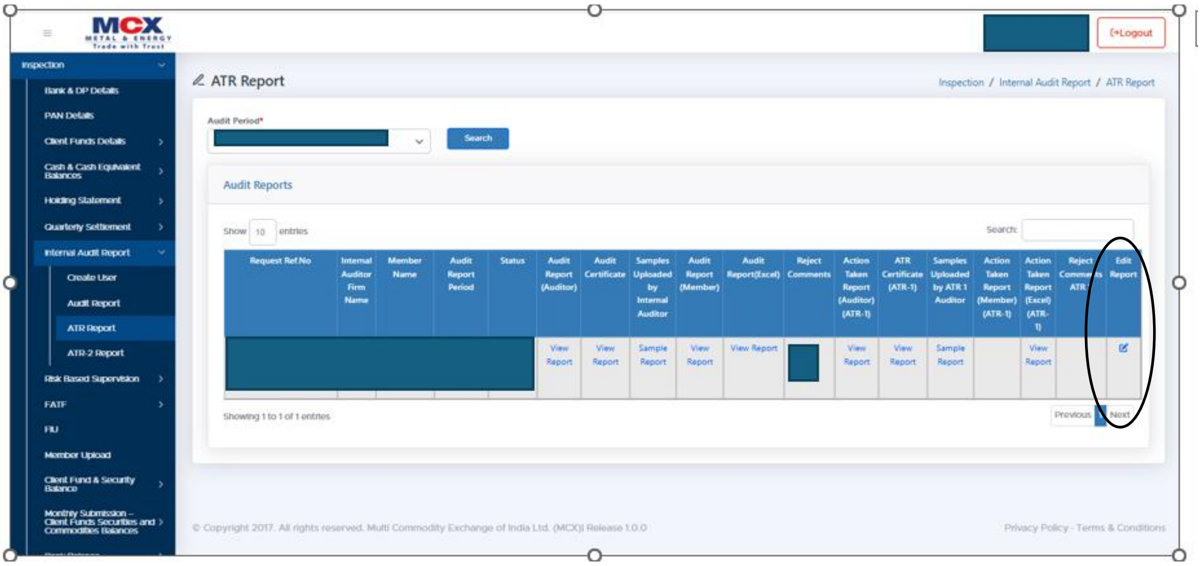


Member can see additional 4 files as shown in previous screen.

- ✓ **Audit Report (Auditor):** Internal Audit-ATR (PDF Document) Digitally Signed by Internal Auditor.
- ✓ **Audit Certificate:** Internal Audit Certificate (PDF Document) Digitally Signed by Internal Auditor
- ✓ **Sample Uploaded by Internal Auditor :** Sample uploaded by Internal Auditor on head wise of Area of verification wherein non-compliance is reported.
- ✓ **Audit Report-ATR (Excel):** Internal Audit-ATR in Excel Format. **(Member kindly note that this excel file is just for view purpose only and no changes shall be made in this file)**

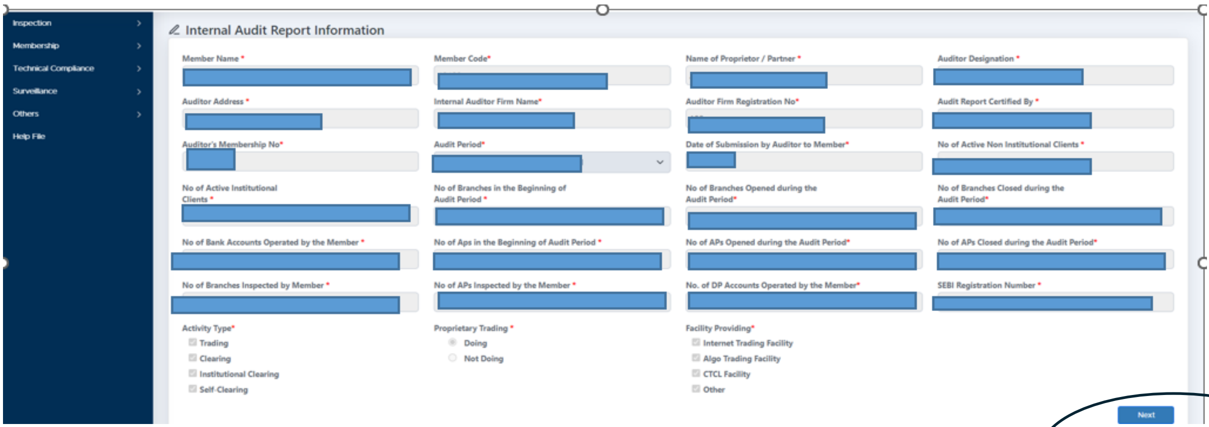
Member shall update the checklist only after the Internal Auditor has submitted its Internal Audit-ATR and status is updated as "Submitted to Member"

Step 18: Click **“Edit report”** icon in the right as shown in below screen.

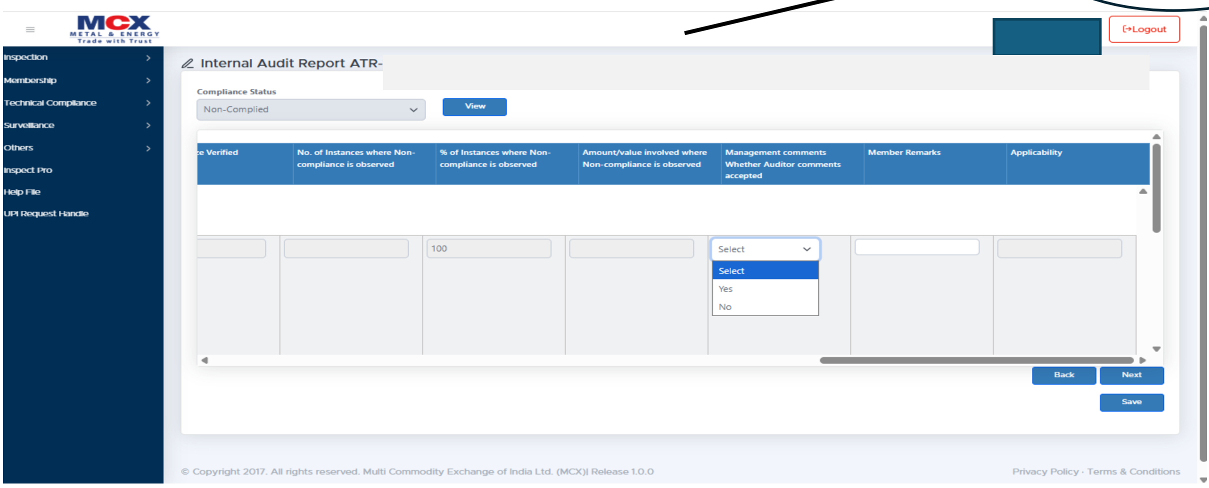


Once member clicks the **“Edit Report”** button, Member will be directed to the following screen which is non editable as auditor has entered the details based on internal audit carried out.

Press “**Next**” button at the bottom the screen.



Step 19 : Once member clicks the Next Button, following screen appears.

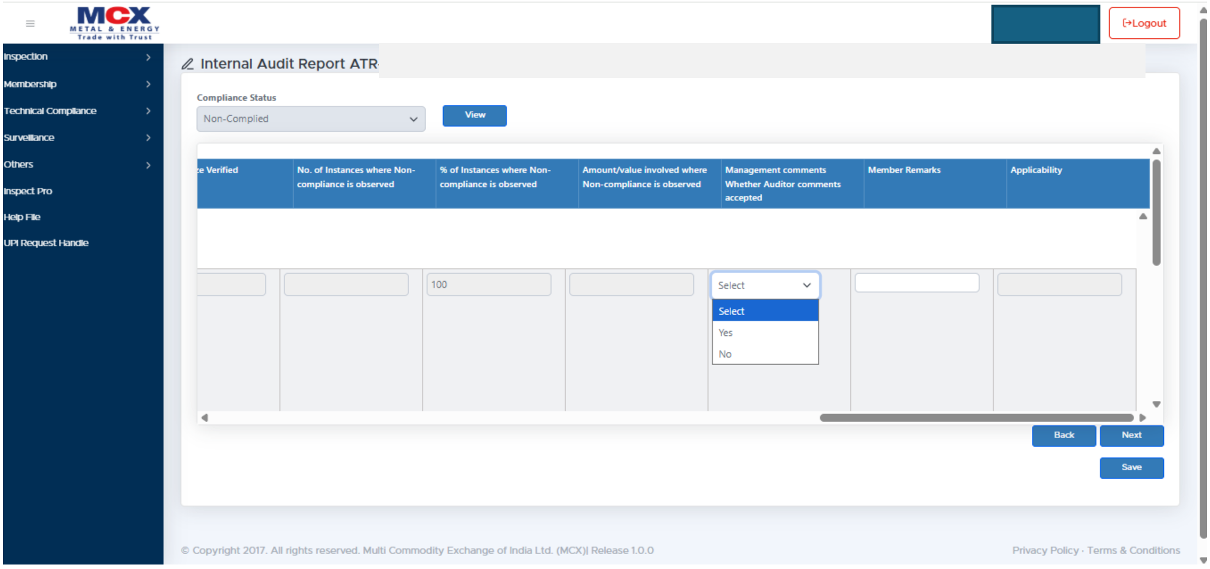


Member shall fill column "Whether Auditor comments accepted" by selecting Yes or No from the drop down for each area of verification.** ***Member shall mandatorily give remarks in column "Management Remarks" wherever observation of the Internal Auditor is NC – 'Not Complied'

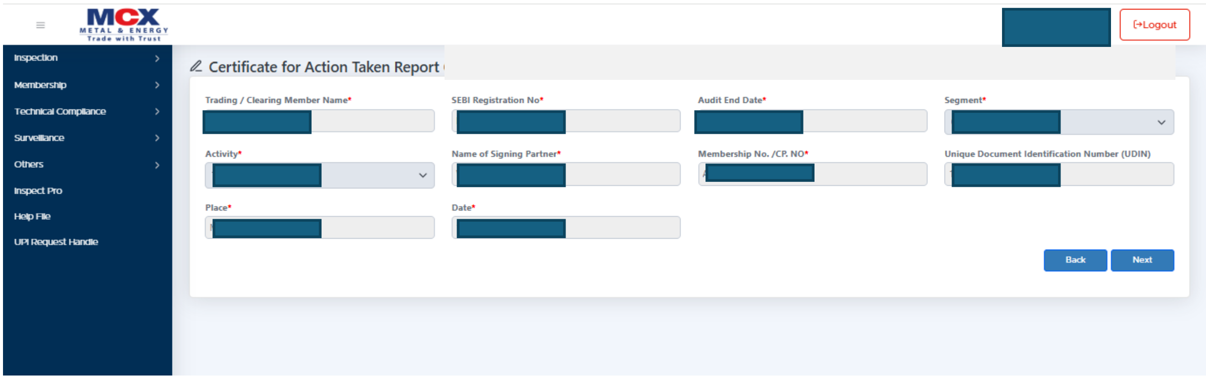
"Management Remarks" is not required wherein Internal Auditor has mentioned as 'Complied'

Please note that supporting/working papers uploaded by the auditor will be visible in column of "Sample Size Verified". Supporting can be downloaded by the member from that column.

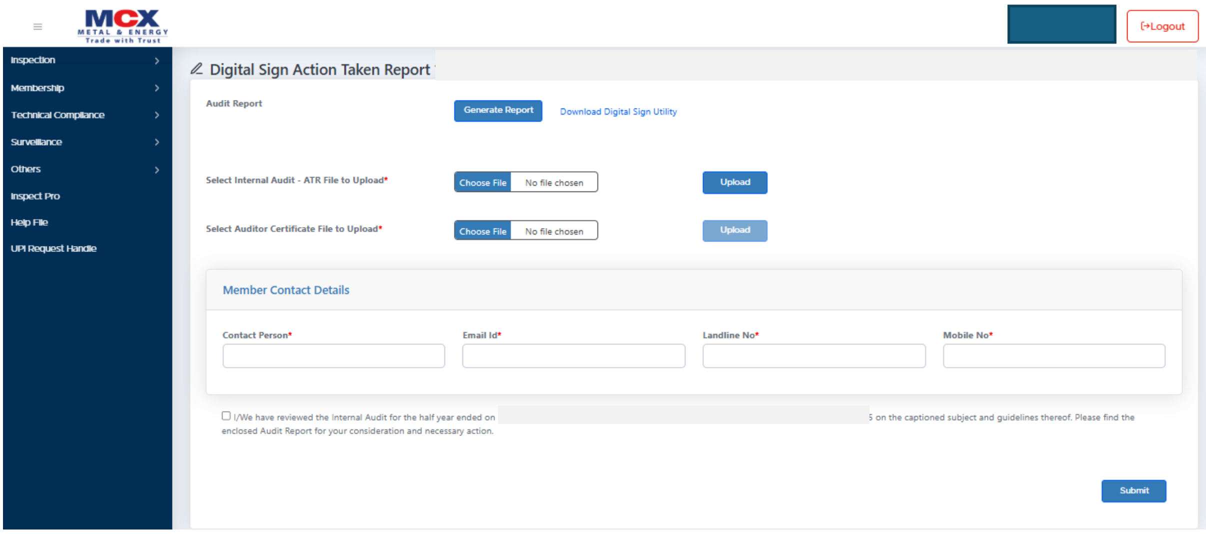
Step 20 : Click "Next" at the end of the screen (The below screen is for updating management comments (Yes or No) and Member remarks in case of not complied reported by the Internal Auditor)



Step 21: Once the member clicks "Next", he will be directed to the non-editable screen as shown below. **(This has already been filled by Internal Auditor and Member can only view it)**.



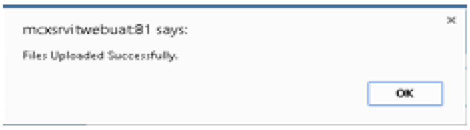
Step 22: After clicking **"Next"**, member will be directed to last page **"Digital Sign Internal Audit-ATR"** as shown below.



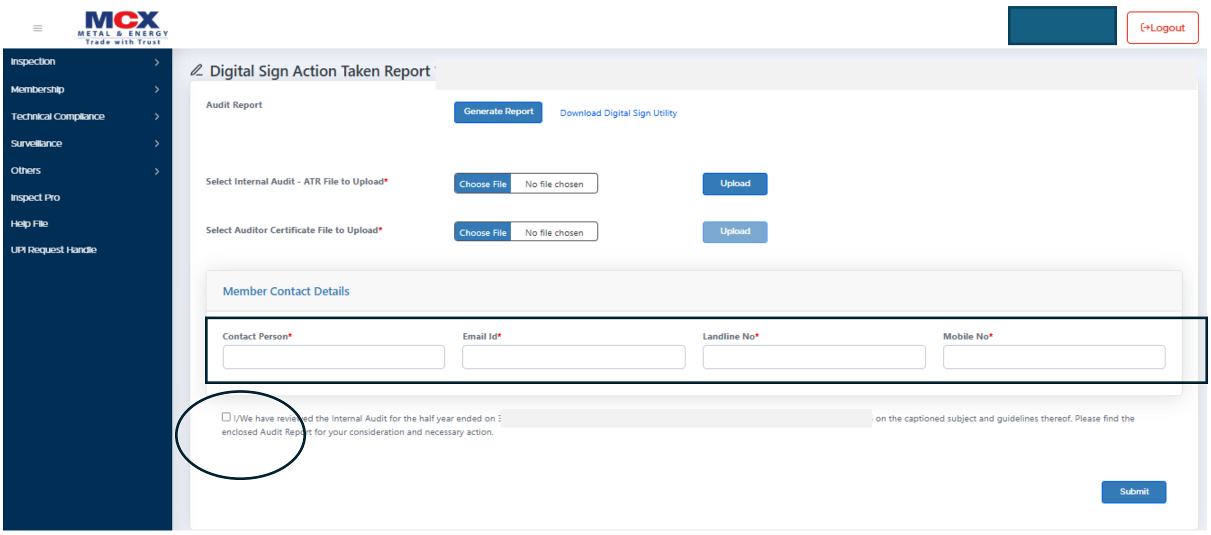
Generate the PDF for Internal Audit-ATR by clicking the button **"Generate Report"** as shown in above screen. PDF file of Internal Audit-ATR will be downloaded. Save the files (if not automatically saved). Member needs to download the Digital Signature Utility and sign Internal Audit-ATR.

Once the PDF file is digitally signed successfully **(member is advised to check the last page of the report to ensure that the document is digitally signed)**, member is required to upload the digitally signed file by using **"Choose File"** button and click **"Upload"**.

Once the file is uploaded, system shows the message as displayed below:

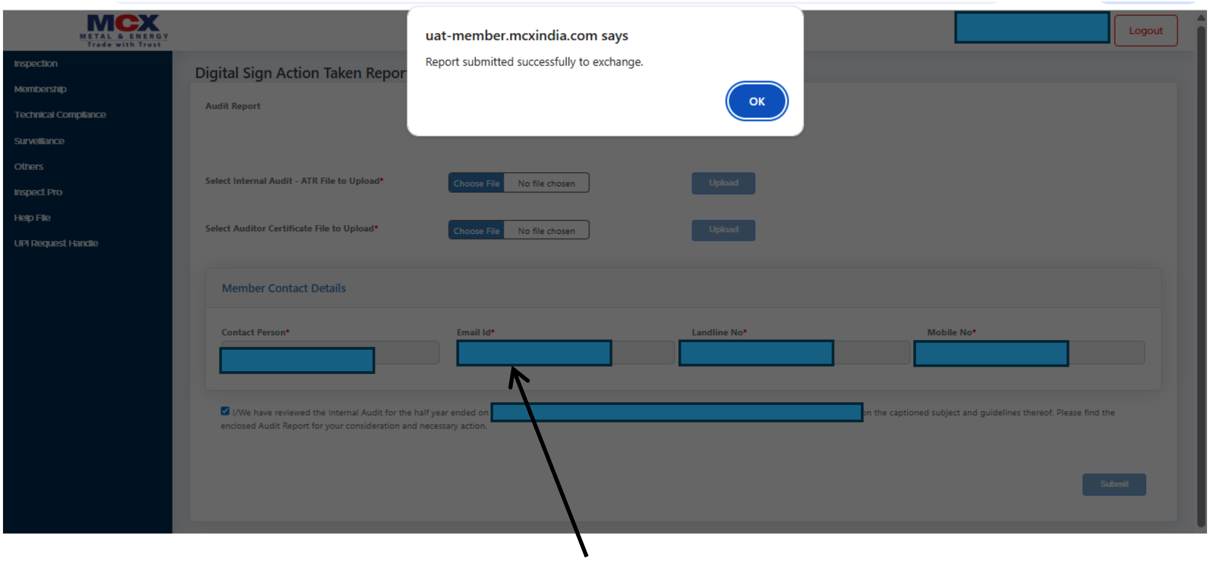


Once the file is uploaded successfully, provide **"Member contact Details"** and tick the check box as shown in below screen



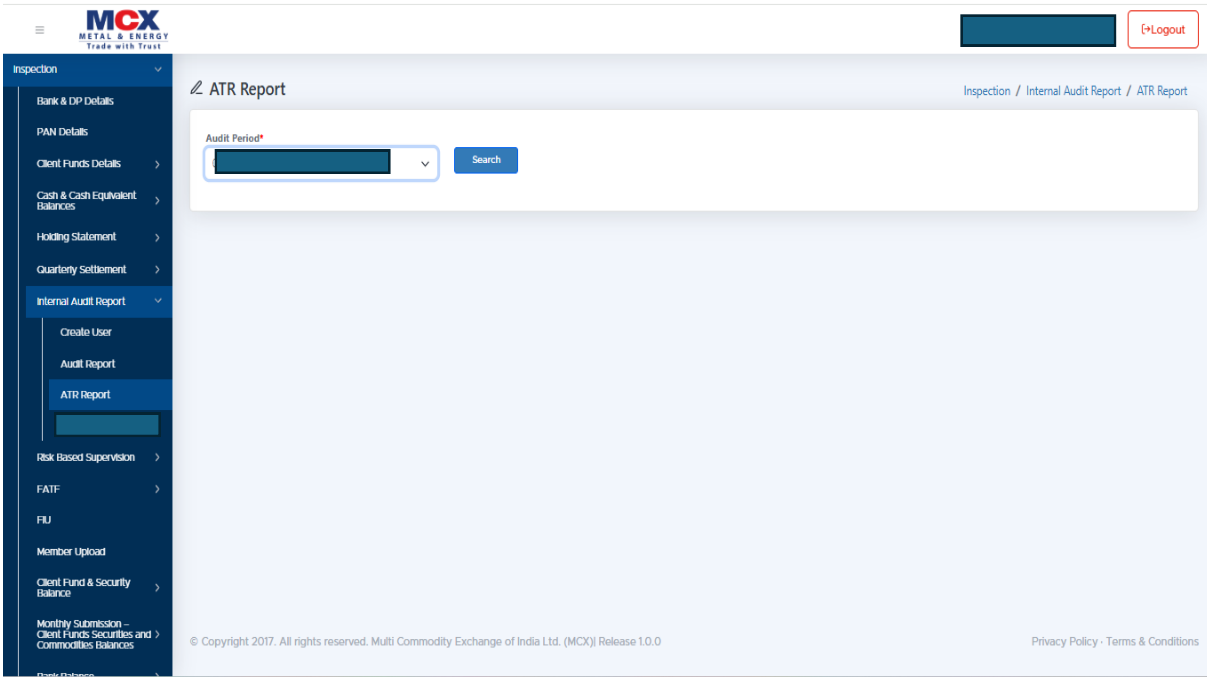
Now click **"Submit"** button at the bottom of the screen.

Once submitted, system will display the message **"Report submitted successfully to Exchange"** as shown below.

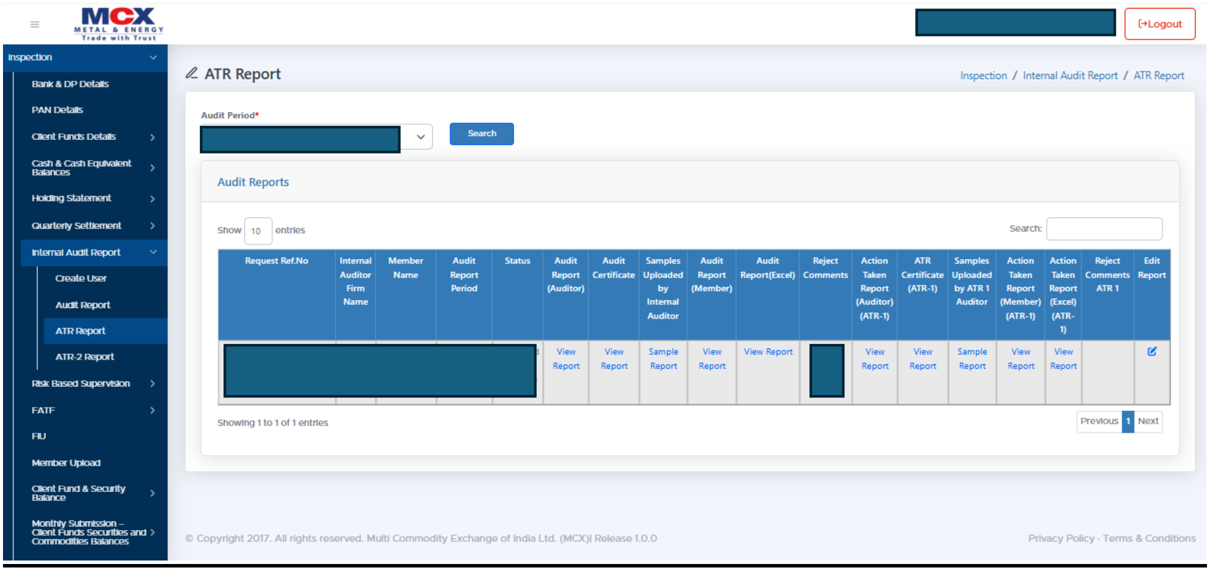


Member will receive system generated email on the registered email as mentioned in the above screen.

Step 23: Member can view the digitally signed and submitted Internal Audit-ATR in Internal Audit Report tab.



Step 24: After selecting ATR report below screen will be display:



Kindly note Exchange reserve the right to reject the Internal Audit Report and / or Internal Audit Certificate along with management remark and comments provided by member on incorrect submission.

General note:

1. Kindly use Google Chrome browser for the Internal Audit-ATR Submission process.
2. Don’t use back button at any point on the portal.
3. Save the data promptly once entered in the system by using “Save” button (wherever provided) Do not leave the system idle for long interval, else the system would log out automatically

For any clarification contact Inspection & Audit Team on 022-66494150 Extn: 9348/9267 or send an email at inspection@mcxindia.com

Annexure-II

CERTIFICATE FOR INTERNAL AUDIT-ATR

We have examined the relevant books of accounts, records and documents maintained by M/s.________________, (name of the trading member) bearing SEBI registration number__________________________________) a member of the Multi Commodity Exchange of India Limited (MCX) to verify and certify the compliance on action taken by the Member for the non-compliances reported in the internal audit report for the half year ended _____________.

Segment	Activity – Trading / Trading and Clearing)	SEBI Registration Number

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 has complied 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, Business Rules 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 per Exchange circular nos. MCX/INSP/672/2023 dated October 05, 2023, and MCX/INSP/180/2024 dated March 26, 2024.

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. We also confirm that no regulatory action is taken against our firm / company/ any of its directors/partners/proprietor.

We hereby certify that Action Taken Report is carried out as per the Exchange circular and we have uploaded all the samples required & it's workings for each broad head of verification on Exchange portal along with Action Taken Report and we shall be liable for any instances of incorrect or erroneous reporting.

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 us as 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: -