



NOTICE

Notice No.

20260514-27

Notice Date

14 May 2026

Category

Compliance

Segment

General

Department

DOSS

Subject

Submission of VAPT Report for the FY 2025-26

Attachments

[Annexure1](#) ; [Annexure2](#) ; [Annexure3](#) ; [Annexure4](#)

To All Trading Members,

This is with reference to SEBI Circular No-SEBI/HO/ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024, on 'Cybersecurity and Cyber Resilience Framework (CSCRF) for SEBI Regulated Entities (REs) and subsequent clarification circulars dated December 31, 2024, March 28, 2025, April 30, 2025, August 28, 2025, and Frequently Asked Questions (FAQ) dated June 11, 2025 issued by SEBI and Exchange circular Notice No. 20250926-63 dated 26th September, 2025 on 'Clarifications regarding VAPT timelines for FY 2025-26'.

As per point no 4.3.2 of the CSCRF circular dated August 20, 2024, REs/trading members shall plan their VAPT activity at the beginning of each financial year. RE's/trading members shall ensure that no audit cycle shall be left unaudited (if any) due to the change in categorization. In all such cases, the unaudited period shall be included in the current audit cycle.

For the implementation of CSCRF guidelines for VAPT audit by REs, following timelines have been prescribed in consultation with SEBI, for the conduct & submission of VAPT Report for trading members falling under **Self-certification RE's, Small-size RE's, Mid-size RE's and Qualified RE's (not categorized as QSB's)**:

i) Once in a Year - Financial Year (April 01, 2025 to March 31, 2026):

| Yearly Submission | Due Date |
|---|-------------------|
| Conduct of VAPT through Cert-in Auditor | June 30, 2026 |
| Report shall be submitted after approval from respective IT Committee | July 31, 2026 |
| Submission of ATR/Revalidation report through same Cert-in Auditor providing closure status after approval from respective IT Committee (If Applicable) | November 30, 2026 |

Note: VAPT activity shall be initiated by the REs after Financial Year (April 2025 – March 2026)

Further, there shall be no change in the timelines for the conduct & submission of VAPT report for trading members categorised as **QSBs and REs which have been identified as 'Protected systems' and/or CII by NCIIPC**. The submission timelines are as follows: -

ii) Half-yearly period- October 01, 2025 – March 31, 2026 (applicable to QSBs & protected REs)

| VAPT for Half Yearly period ending March 31, 2026 | Due Date |
|---|-----------------|
| Conduct of VAPT through Cert-in Auditor and report shall be submitted after approval from respective IT Committee | June 30, 2026 |

| | |
|---|--------------------|
| Submission of ATR/Revalidation report through same Cert-in Auditor providing closure status after approval from respective IT Committee (If Applicable) | September 30, 2026 |
|---|--------------------|

The comprehensive scope of VAPT shall include all critical assets and infrastructure components including (not limited to) Networking systems, Security devices, Servers, Databases, Applications, Systems accessible through WAN, LAN as well as with public IP's, websites, etc. The detailed scope of VAPT and testing methodologies for conduct of VAPT activity (Half Yearly/Yearly) shall be in accordance with Annexure – L of the SEBI CSCRF circular dated August 20, 2024, same is enclosed as **Annexure-1**.

The updated formats of VAPT Audit report/Summary, Declaration from REs and Auditor, Assessment Details in accordance with SEBI CSCRF has been enclosed as **Annexure-2**. Further as per SEBI Circular no- SEBI/HO/ ITD-1/ITD_CSC_EXT/P/CIR/2025/119 dated August 28, 2025- on Technical Clarifications to CSCRF for SEBI Regulated Entities (REs), REs/trading members shall NOT submit details of explicit vulnerabilities (detailed report) unless and otherwise asked for the details by SEBI/Exchanges.

However, Trading Members/REs are required to maintain records of detailed VAPT report as per format provided in Point 7 of Annexure- A of SEBI circular no. SEBI/HO/ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024, and retain records of VAPT report along with POCs for a minimum period of three years. The detailed report shall be required to submit by REs/trading members as & when sought by SEBI/Exchanges.

For the conduct of VAPT and appointment of auditor/auditing organization, RE's/Trading Members are required to refer auditor selection norms provided in **Annexure-3**, which are in accordance with norms specified in SEBI Cir no- SEBI/HO/ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024. Further, trading members and appointed auditor are requested to take note of SEBI Circular No- HO/13/19/12(1)2026-ITD-1_CIMGI/10873/2026 dated May 05, 2026, on "Advisory on Emerging Advanced Artificial Intelligence (AI) Tools for Vulnerability Detection".

Trading members are requested to take note of Annexure 1 of Exchange Circular No. 20260417-45 dated April 17, 2026, regarding actions for non-compliances observed in periodic submissions made by Trading Members/REs related to submission of VAPT Report. The details of financial disincentive(s)/ penalties/ disciplinary action(s) have been provided in **Annexure-4**.

The link for submission of VAPT audit reports/ Compliance related submissions shall be available **w.e.f. May 25, 2026**.

All members are advised to take note of the above & bring the provisions of this circular to the notice of the auditors and put in place adequate systems and procedures to ensure strict adherence to the compliance requirements.

For and on behalf of BSE Ltd

Richa Gosh
Deputy Vice President
Member Oversight

Dhananjay Mudgal
Asst. Vice President
Member Oversight

Enclosure:

Annexure 1 - Comprehensive scope of VAPT Audit Report

Annexure 2 - Formats of Declaration from RE/Auditor, VAPT Summary Audit report and Assessment Details

Annexure 3 - Auditor selection norms

Annexure 4 – Actions for non-compliances observed in periodic submissions made by Trading Members/REs related to submission of VAPT Report

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

| Sr. No | Purpose | Contact No | Email ID |
|---------------|----------------------------|--|--|
| 1. | VAPT Audit Process related | 022-69158540 022-45720640 022-45720440 | m scopr@bseindia.com |