
Compliance Guidelines for Digital Accessibility Circular 'Rights of Persons with Disabilities Act, 2016 and rules made there under mandatory compliance by all Regulated Entities

This is with reference to SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/131 dated September 25, 2025, and Exchange Circular No.: MCX/MEM/490/2025 dated September 29, 2025, pertaining to Rights of Persons with Disabilities Act, 2016 and Rules made there under - Mandatory Compliance by all Regulated Entities.

Based on the representations received from the Trading Members (TM) & to facilitate uniform implementation of the Digital Accessibility Circulars and in consultation with SEBI it is clarified that:

1. All Digital Platforms of Trading Members shall be subject to an Accessibility Audit conducted by an IAAP-certified accessibility professional in accordance with the applicable SEBI Circulars.
2. For standard applications/platforms (such as e.g., front-office CTCL solutions, back-office access given to clients, investors, e-KYC products, mobile/ internet trading applications, etc.) that are being used across multiple regulated trading members with no customisation impacting the accessibility characteristics of the platform/application has been carried out, the trading members may coordinate with the respective platform/application vendors to obtain the requisite accessibility audit report/certificate from an IAAP-certified accessibility professional.

The accessibility audit report for standard digital platforms/applications, conducted by an IAAP-certified professional, along with the closure/non-closure status of audit findings/observations demonstrating compliance with the provisions of the Rights of Persons with Disabilities Act, 2016, can be submitted by Trading Members for compliance with the aforesaid SEBI and MCX circulars.

In such cases, the vendor shall provide a covering letter addressed to the concerned Trading Member mentioning the details of the Digital Platform (e.g., version number, where applicable); and details of the IAAP-certified accessibility professional who conducted the audit and a copy of the Accessibility Audit Report in the name of the vendor to Trading Member.

Further, a checkpoint shall be incorporated in the Standardised Terms of Reference (TOR) of System Audit (wherever applicable) for validation and confirmation by the System Auditor that the IAAP Audit Certificate submitted by the Trading Member for vendor-provided software/applications pertains to the standard version of the platform/application and that no customisation as referred above has been carried out, where the Trading Member has

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relied upon a vendor-provided Accessibility Audit Certificate. For Trading Members who are not required to submit a System Audit report, a suitable alternative mechanism/submission shall be prescribed subsequently.

3. For digital platforms/applications unique/customised to a regulated Trading Member, including its website, mobile/web applications, back office/KYC applications or other inhouse systems, applications etc., the Trading Member should continue to undertake an independent accessibility audit through an IAAP-certified accessibility professional and ensure related compliance.
4. It is clarified that nothing contained in this circular shall be construed as imposing any regulatory obligation upon vendors to obtain or provide an Accessibility Audit Report. Any such arrangement shall be governed by the contractual terms agreed upon between the vendor and the concerned TM. Further, a TM may, at its discretion, choose not to rely upon the vendor's Accessibility Audit Report and may instead engage an IAAP-certified accessibility professional of its own choice.
5. It is to be noted that the responsibility for complying with the applicable Digital Accessibility Circulars, including implementation of remediation measures and adherence to prescribed accessibility standards, shall continue to vest solely with the concerned TMs.

In accordance with the requirements specified in the aforesaid SEBI circular, Trading Members shall submit the Final Accessibility Audit Report for Digital Platforms to the Exchange by July 31, 2026.

The modalities for submission, including the designated path on the Enhanced Supervision portal shall be notified separately through Exchange circular.

Trading Members are advised to take note of the contents of the circular and ensure compliance.

For and on behalf of **Multi Commodity Exchange of India Limited**

Kirtida Zaverchand Nagda
Head of Department – Membership

Kindly contact Membership Team on 022-66494040 or send an e-mail at membership@mcxindia.com and customersupport@mcxindia.com for any clarification.

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