Circular No.: MCX/TECH/433/2026 July 27, 2026

Reminder - Submission of VAPT Report for the FY 2025-26

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, Exchange circular MCX/TECH/488/2025 dated September 26, 2025, on 'Clarifications regarding VAPT timelines for FY 2025-26' and Circular MCX/TECH/294/2026 dated May 18, 2026.

The due date of submission of VAPT report is as mentioned in the tables below:

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

Further, members' attention is drawn to Exchange circular ref. no. MCX/MEM/499/2025 dated September 29, 2025, regarding technology based sharing mechanisms of common submissions among Exchanges. As per said circular, trading members of NSE who are also registered with any other Exchange(s) (BSE/MSE/MCX/NCDEX) and are using Algorithm software across any of the

Exchange/s are required to submit VAPT details to NSE. NSE will share this submission with the respective Exchange/s. Members of the Exchange who are not registered with NSE will continue to make submissions to the Exchange as per existing process.

Members are once again reminded to submit the aforesaid submission in the prescribed format on the Exchange Portal.

For and on behalf of
Multi Commodity Exchange of India Ltd.

Denny Paul
AVP – Technology

Kindly contact Customer Service Team on 022 – 6649 4040 or send an email at customersupport@mcxindia.com for any clarification.