

Circular No.: NSDL/POLICY/2026/0144

September 28, 2026

Subject: Submission of Action Taken Report (ATR) for annual and half yearly VAPT audit through e-PASS Application.

Attention of Participants is invited to Circular Nos. NSDL/POLICY/2025/0121 dated September 12, 2025, NSDL/POLICY/2026/0075 dated May 12, 2026, and NSDL/POLICY/2026/0111 dated August 3, 2026, regarding submission of the Action Taken Report (ATR) for observations reported as non-complied in the initial Half-Yearly and Annual VAPT Audit Reports.

In this regard, Participants are advised to submit the ATR through the electronic form available in the e-PASS application. The detailed process for submission of ATR is enclosed as Annexure A.

The timelines for submission of the Action Taken Report (ATR) of Annual and Half year VAPT Audit Report, wherever applicable, are specified below.

Report	Periodicity/ Frequency	Due date of initial report submission	Action Taken Report (ATR) submission (if applicable)
Half yearly (Qualified stockbroker/ Protected systems' and/ or CII by NCIIPC)	Half yearly (October 25- March 26)	The end of the financial year. i.e. by 30th June	The due date of submission. i.e. by 30th September
Annual (Non-Qualified stockbroker)	Annually (April 25- March 26)	The end of the financial year. i.e. by 31 st July	The due date of submission. i.e. by 30th November

Participants are further advised to note that non-submission of the action taken report (ATR) pertaining to the annual VAPT audit and half-yearly VAPT audit report within the stipulated timelines shall be treated as a regulatory non-compliance and may attract penalties and/or such other actions as may be deemed appropriate under the NSDL Business Rules, as amended from time to time.

For any technical assistance related to the e-PASS application, Participants may send an email to epass@nsdl.com or contact us at 022-69448491 / 022-69448457.


National Securities Depository Limited

National Securities Depository Limited 3rd Floor, Naman Chamber, Plot C-32, G-Block, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra - 400 051 Tel.: 91-22-2499 4200 | Fax: 91-22-2497 6351 | Email: info@nsdl.com | Web: www.nsdl.co.in
 Corporate Identity Number: L74120MH2012PLC230380 PUBLIC

For any clarifications on the circular, kindly email at dpaudit@nsdl.com or call us on (022)-4216-5062, (022)-4216-5038

**For and on behalf of
National Securities Depository Limited**

Rakesh Mehta

Digitally signed by Rakesh
Mehta
Date: 2026.09.28 18:53:45
+05'30'

**Rakesh Mehta
Vice President**

Enclosure : One

FORTHCOMING COMPLIANCE			
Particulars	Deadline	Manner of sending	Reference
Investor Grievance Report (Monthly)	By 10 th of the following month	Through e-PASS	Para 22 of 'Grievance Redressal' chapter and Para 27 of 'Internal Controls/Reporting to NSDL/SEBI' chapter of NSDL Master Circular for Participants
Compliance report w.r.t Same Mobile number and/ or email address captured for multiple accounts. (monthly)	Before 27 th of following month	Through Email.	Para 26 of 'Miscellaneous' chapter of NSDL Master Circular for Participants.



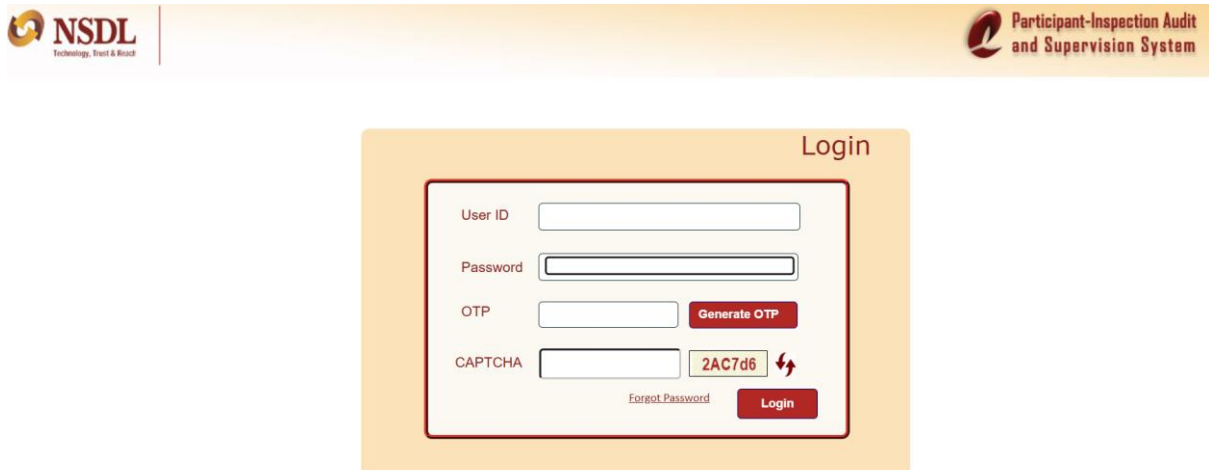
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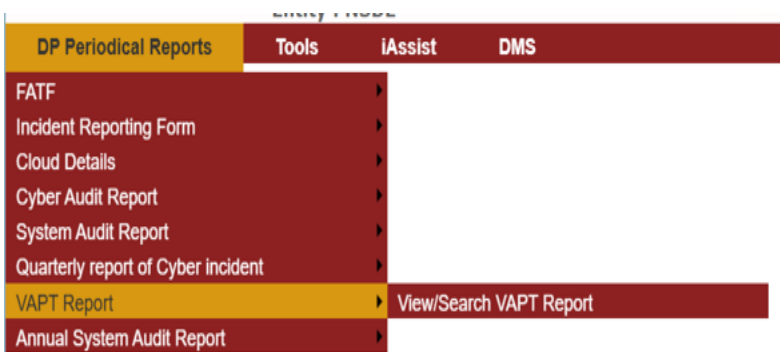
Annexure A
Guidelines to add the Auditor details and submit the Annual / half yearly VAPT Audit Action Taken Report [ATR] Report
Guidelines to submit ATR details:

 Click on e-pass URL: <https://www.epass.nsdl.com>

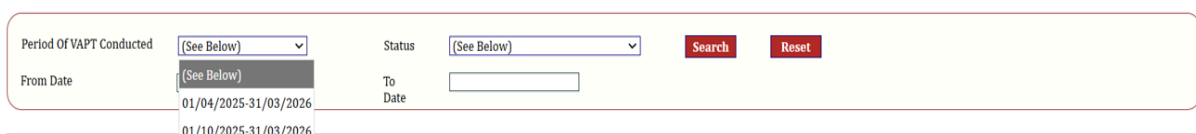
1. Login into e-PASS by using DP Checker



2. Go To DP Periodical Reports -> VAPT Audit Report -> View/Search VAPT Audit Report



3. Select the Audit Period and click on the respective DP name from the drop-down list displayed.



Participant Services Circular

4. Fill the Action Taken Report (ATR) number, select the closure date, and choose the appropriate status from the drop-down list.

Action Taken Report

Scope	Particulars	Identified vulnerabilities				Severity	Target Date for Closure of finding	Action taken / to be taken	Status	Remarks
		Critical	High	Medium	Low					
Network	VA of infrastructure	24	58	25	6	Critical	22/07/2026	All reported vulnerabilities	Closed	closed
Applications	VA of Application	0	0	1	10	Medium	22/07/2026	All reported vulnerabilities	Closed	closed
Network	Network Segmentation	0	0	0	0	Low	22/07/2026	All reported vulnerabilities	Closed	closed

Closed vulnerabilities in revalidation

Scope	Particulars	Closed vulnerabilities in revalidation				Activity
		Critical	High	Medium	Low	
Network	VA of infrastructure Internal and External	24	58	25	6	✗
Applications	VA of Applications Internal and External	0	0	1	10	✗
Network	Network Segmentation	0	0	0	0	✗
Server	deployments Configuration Audit of infrastructure	0	0	0	0	✗

Open vulnerabilities in revalidation

Scope	Particulars	Open vulnerabilities in revalidation				Timelines to close the open vulnerabilities(if any)	(Reason for Delay)If closure of open vulnerabilities is beyond due date	Activity
		Critical	High	Medium	Low			
Network	VA of infrastructure Internal and External	0	0	0	0	22/07/2026	closed	✗
Applications	VA of Applications Internal and External	0	0	0	0	22/07/2026	closed	✓

Total Identified Vulnerabilities	Critical	High	Medium	Low
140	24	59	34	23
Closed Vulnerabilities in revalidation	Critical	High	Medium	Low
140	24	59	34	23
Open Vulnerabilities in revalidation	Critical	High	Medium	Low
0	0	0	0	0
New Vulnerabilities in revalidation	Critical	High	Medium	Low
0	0	0	0	0
Total Open Vulnerabilities	Critical	High	Medium	Low
0	0	0	0	0

SUBMIT

5. Click on the 'Submit' button and thereafter verify the ATR submitted to NSDL for the respective audit period.

View/Search VAPT Reports			
Period Of VAPT Conducted	01/04/2025-31/03/2026	Status	ATR Submitted to NSDL
From Date	(See Below)	To Date	
	01/04/2025-31/03/2026		
	01/10/2025-31/03/2026		