

Date: 30-Jun-2026

To,

Ventura Securities Limited
Trading Member code: 07604

Registered & Correspondence Office:
I - Think Techno Campus
8th Floor, B Wing,
Pokhran Road No. 2
Thane - 400607

Subject - Trade Annulment Review Request dated 29-May-2026

Respected Sir/ Madam,

This is with respect to your Trade Annulment Review Request (TARR) dated 29-May-2026.

In line with Clause 5, Chapter VII, of the NSE Byelaws issued by the National Stock Exchange of India Limited read with the rules and regulations and the circulars on trade annulment, your Trade Annulment Review Request was placed before the Regulatory Oversight Committee in its meeting held on 25-Jun-2026.

Please find enclosed the decision of the Regulatory Oversight Committee in line with the process laid down under the SEBI Circular dated 16-Jul-2015, read with NSE Circular dated 12-Oct-2015.

Yours faithfully,

Sd/-

Dnyansagar Gadgil

Associate Vice President

National Stock Exchange of India Limited

IN THE MATTER OF TRADE ANNULMENT REVIEW REQUEST OF VENTURA SECURITIES LIMITED FOR THE TRADES ON 29-MAY-2026 IN EQUITY PUT OPTION CONTRACT WITH UNDERLYING SYMBOL YESBANK (YES BANK LIMITED) (STRIKE PRICE OF RS.16.00/-, EXPIRING ON 25-AUG-2026)

CORAM:

Shri. Srinivas Injeti	Chairman
Justice (Retd.) Smt. Abhilasha Kumari	Committee Member
Prof. (Dr.) Mamata Biswal	Committee Member
Shri P. R. Ramesh	Committee Member
Shri Sanjay Shorey	Executive Director

(Decision of the Regulatory Oversight Committee (“Committee”) meeting held on 25-Jun-2026, under Clause 5 of Chapter VII of the NSE Byelaws)

1. BACKGROUND:

- 1.1. On 29-May-2026, the Exchange observed a significant rise in the opening traded price of an Equity Put Option contract with the underlying scrip YESBANK (Strike Price of Rs.16.00/- expiring on 25-Aug-2026). The contract traded price on 29-May-2026 at 09:19:53 AM was Rs.19.95/- as compared with previous trading day's (i.e., 27-May-2026, since 28-May-2026 was a trading holiday) closing traded price of Rs.0.06/-. The Exchange observed that there was no corresponding movement in underlying price of YESBANK in cash segment at market open i.e. at 09:15:00 on 29-May-2026 to justify the movement of the traded price of the contract from Rs.0.06 to Rs.19.95. Further, it was observed that the traded price of the contract subsequent to this trade/ trades came back to Rs.0.06.
- 1.2. Upon detailed verification of the trade and order logs, the Exchange observed that on 29-May-2026, Mr. Ganesh Malviya (“**Client**”), while trading through Trading Member, Ventura Securities Limited (Trading Member Code:07604) (“**Trading Member**”/ “**Applicant**”/“**Ventura**”) placed one non-algo order through STWT(order placed through a mobile device), to buy “YESBANK 25-Aug-2026 Expiry Put Option” with a limit price of Rs.20.00/- and quantity of 1,86,600 at 09:19:53 where the previous close price of the contract was Rs.0.06/-.
- 1.3. The Exchange observed that prior to the abovementioned buy order, at 09:15:00 one sell order with a limit price of Rs. 19.95/- and a quantity of 1,86,600 was placed by one counterparty which was subsequently matched with the impugned buy order.

- 1.4. The Exchange further observed that on May 27, 2026, four trades were executed at Rs.0.06. The price volume details of the contract are given in the following table:

Date	Open Price	High Price	Low Price	Close Price	Settlement Price	Volume	Premium Value	No. of trades
27-May-26 Wednesday	0.06	0.06	0.06	0.06	0.05	3,73,200	22,392	4
29-May-26 Friday	0.06	19.95	0.03	0.06	0.05	4,66,500	37,55,325	8
01-Jun-26 Monday	-	-	-	-	0.05	-	-	0

- 1.5. The Exchange also analyzed the trade prices of the underlying stock YESBANK. However, it was observed that there was no corresponding movement in the traded price of the underlying stock. It is pertinent to note that the strike price of the put option contract was Rs.16 and it was a “Out of Money” contract. The traded price summary details of the contract are as under:

Date	Open	High	Low	Close	Volume (In lakhs)	Value (Rs. in crores)	No. Of Trades
27-May-26	22.82	22.97	22.72	22.76	836.42	190.94	67,034
29-May-26	22.80	23.55	22.80	23.15	3,137.62	729.10	1,62,527
01-Jun-26	23.28	23.77	22.92	23.01	1,419.75	330.61	1,25,534

- 1.6. The Exchange analyzed the activity of the Client Mr. Ganesh Malviya trading through TM Ventura in the said contract. The trade details of the client are as under:

Trade Date	Brought Forward Long Quantity	Brought Forward Short Quantity	Days Buy Quantity	Days Sell Quantity	Buy Avg Price	Sell Avg Price	Carry forward Long Quantity	Carry forward Short Quantity
27-May-2026	0	0	0	1,86,600	0	0.06	0	1,86,600
29-May-2026	0	1,86,600	1,86,600	0	19.95	0	0	0
Total	0	0	1,86,600	1,86,600			0	0
Total square off difference {(0.06 - 19.95) * 1,86,600}								(37,11,474)

From the above table it can be observed that the trading activity of the Client resulted in a negative square off difference of Rs. 37,11,474/-.

- 1.7. NSE circular NSE/FAOP/61814 dated 29-Apr-2024, provides details of the framework of Operating Range and the Limit Price Protection range within which Exchange trading system allows orders to be placed.

1.7.1. Operating Price Ranges (OPR) of contracts for Options Contracts: The Exchange has introduced contract specific price ranges based on the delta of the options contract, using underlying previous close price and volatility, subject to a minimum price range which would be applicable for all contracts. The Exchange computes price range for each options contract using the above-mentioned method on a daily basis. The price range so computed shall be applicable for the next trading day. Members can view the daily price range for the options contracts on NEATPlus front end upon double clicking / key (Shift+F8), the options contract on Market Watch screen after uploading the latest contract.txt file. The price range may be flexed during the day. based on various objective factors viz. variation in the underlying price, contract price, volatility, interest rate, etc. Limit Price Protection (LPP) range on both the sides of the reference price for Stock Options contracts would be as under:

Instruments	Reference Price (in Rs)	Absolute	% of Reference Price
OPTIDX and OPTSTK	<=50	+ / - 20	-
	>50	-	+ / - 40%

1.7.2. It is observed that at the market open on May 29, 2026, the opening reference price of the said contract was Rs.0.05/-, i.e. less than Rs. 50.00/-

1.7.3. It is pertinent to note that considering the methodology defined in the above-mentioned circular, the Limit Price Protection range at 09:15:00 on May 29, 2026 was between Rs.0.05/- to Rs.20.05/-. Therefore, the buy order placed with a limit price of Rs. 20.05/- was accepted by the trading system of the Exchange.

2. **Regulatory Framework: Annulment Of Trades**

At the outset, it is appropriate to refer to the relevant regulatory provisions pertaining to trade annulment and the review request for trade annulment extracts whereof are reproduced below:

2.1. SEBI Circular on Annulment of Trades
(SEBI Circular CIR/MRD/DP/15/2015 dated 16-Jul-2015) ("SEBI July Circular")

- “2. *In order to bring about uniformity and transparency in the process of trade annulment, a discussion paper was placed on SEBI’s website to seek views and suggestions of the public.*

Taking into consideration inputs received during the discussion process, it has been decided that stock exchanges shall be guided by the following provisions with regard to the mechanism for annulment (or by whatever named called of trade(s) resulting from material mistake or erroneous orders:

- 2.1. *Examination of trade(s) for annulment may be taken up either Suo-moto by stock exchange or upon receipt of request from a stock broker. Stock exchanges shall define suitable criteria so as to discourage frivolous trade annulment requests from the stock brokers.*
- 2.3. *Stock brokers shall submit such request to the stock exchange within 30 minutes from execution of trade(s) which is sought to be annulled. However, stock exchange may consider requests received after 30 minutes, but no longer than 60 minutes, only in exceptional cases and after examining and recording reasons for such consideration.”*

2.2. NSE Bye-laws on Trade Annulment

- 2.2.1. As a thumb-rule, trades executed on stock exchanges are inviolable to preserve the sanctity of trading on the exchanges. That said, there are a few exceptional cases, where the Exchange reserves the powers to annul trades. These powers primarily emanate from Chapter VII, Clause 5 of the Exchange’s bye-laws (“Bye Laws”) and read as follows:

“(a) *All the dealings in securities on the Exchange made subject to the Bye Laws, Rules and Regulations of the Exchange shall be inviolable and shall be cleared and settled in accordance with the Bye Laws, Rules and Regulations of the Exchange.*

However, the Exchange may by a notice annul the deal(s) on an application by a Trading Member in that behalf, if the relevant authority is satisfied after hearing the other party/parties to the deal(s) that the deal(s) is/are fit for annulment on account of fraud or willful misrepresentation or material mistake in the trade.

- (b) *Notwithstanding anything contained in clause (a) above, the Exchange may, to protect the interest of investors in securities and for proper regulation of the securities market, Suo motu annul deal(s) at any time if the relevant authority is satisfied for reasons to be recorded in writing that such deal(s) is/are vitiated by fraud, material mistake, misrepresentation or market or price manipulation and the like.*
- (c) *Any annulment made pursuant to clauses (a) and (b) above, shall be final and binding upon the parties to trade(s). In such an event, the trading member shall be entitled to cancel the relevant contracts with its constituents.”*

2.3. NSE's Policy on Trade Annulment
(NSE Circular NSE/FAOP/30738 dated 11-Sep-2015)

- 2.3.1. Pursuant to the SEBI July Circular, the Exchange issued a subsequent Circular on annulment of trades dated 11-Sep-2015 (“NSE Circular”), which stipulates that the trades for which annulment is requested shall have to fulfil the condition listed below to be taken up for further processing.
- 2.3.2. In line with the SEBI July Circular above, trade annulment requests should be submitted to the Exchange within 30 minutes of the execution of trade.
- 2.3.3. The trading member is required to satisfy certain conditions before placing an order for annulment of trades such as complying with the risk management measures, placing orders within placement limits through qualified dealers and having adequate margins. It should be satisfied that it has taken adequate precautions such as defining order quantity limit, order value limit and all the risk management measures as provided by the Exchange from time to time and that such orders have been filtered as per the risk management principles of the member.
- 2.3.4. Annulment request can only be made through an electronic mechanism on the Exchange platform. Other modes may be permitted only in exceptional cases.
- 2.3.5. If the counterparty member does not intimate his consent within 30 minutes of market closure or within 30 minutes from time of trade

annulment requests whichever is later, it will be deemed that the counterparty member does not consent to the request for annulment.

- 2.3.6. Trade annulment requests should be placed only by the executing trading member.
 - 2.3.7. A trade annulment request can only be made for an order of a minimum value of Rs 10 Crores (premium value in case of options contracts shall be considered).
 - 2.3.8. Minimum trade value of trades originating from a single order for which annulment request is made should be Rs. 10 lakhs or above (premium value in case of options contracts shall be considered).
 - 2.3.9. The trades in question are not within the price bands / operating range / trade execution range applicable at the time of trade.
 - 2.3.10. Trades for which annulment requests are submitted should have been executed in the continuous session (Normal market).
 - 2.3.11. Trades have not been executed with the same PAN number on both the buying and selling side.
- 2.4. Trade Annulment Review Request (TARR) directives from SEBI and NSE (NSE Circular NSE/INVG/30931 dated 12-Oct-2015 read with SEBI July Circular)
- 2.4.1. Vide the TARR Circular, the Exchange has, inter alia, outlined the following process to consider a trade annulment review request:
 - 2.4.1.1. Once a stock exchange issues its decision on a trade annulment request received from a trading member, the trading member may request a review of such decision.
 - 2.4.1.2. The Trade Annulment Review Request must be filed at least 3 hours prior to the pay-out deadline. The Exchange requires review requests in relation to trades executed on the F&O segment to be submitted by Trade Date + 1 by 8:30 am.
- 2.5. On 27-May-2020, the Exchange issued a consolidated circular for various policy and operational matters which, inter alia, requires the following: ("Consolidated Circular" - NSE circular NSE/FAOP/61814 dated 29-Apr-2024)

- 2.5.1. The trading system of the Exchange provides a facility for a member to initiate a trade annulment request in electronic form whereupon the member on the other side of the trade would receive the details of the trade annulment request anonymously.
- 2.5.2. The member has to file the annulment request electronically only on the trading system provided by the Exchange.
- 2.5.3. The Exchange will then electronically disseminate the request on trading system to all concerned counter party trading members to the trade(s) for which annulment is sought.
- 2.5.4. Considering the strict timelines, the Exchange must not accept any request in any form or any other mode other than the screen based electronic mechanism provided by the Exchange. However, the Exchange may permit filing of request in any other mode in exceptional cases.
- 2.5.5. Counterparty trading member who accepts the request has to respond to the trading system intimating their consent to annul the trade.
- 2.5.6. The Exchange may seek additional information from such members for further scrutiny, if found necessary.
- 2.5.7. The Exchange may require the trading members to submit additional information such as reason to request for trade annulment, whether similar trade annulment requests have been submitted simultaneously to other exchange etc. in electronic form, through ENIT.

3. Chronology Of Events with Respect to Trade Annulment Request and Trade Annulment Review Request Made by the Trading Member.

- 3.1. The Trading Member Ventura submitted its request for annulment of trade on Exchange terminal on May 29, 2026 at 10:27 am and also forwarded the request via its email on 29-May-2026 at 10:45 am.
- 3.2. As per the trade annulment policy, the requests should be submitted by the Trading Members to the Exchange within 30 minutes of the execution of trade. In the instant case, this criterion is not met by TM Ventura since the trade time was 09:19:53 a.m. and request for annulment was 10:27:00 a.m.

3.3. As per Exchange circular NSE/FAOP/30738 dated 11-Sep-2015 all the mentioned criteria need to be fulfilled for the Exchange to take up the request for further processing. In the instant case, certain conditions were not fulfilled. The details of the same are as under:

Sr. No.	As per Exchange circular no. NSE/FAOP/30738 dated 11-Sep-2015 all below mentioned criteria needs to be fulfilled	Fulfilled (Yes/ No)
1	Trade Annulment requests should be placed by the executing trading members (buyer / seller) who have executed the trade(s) to be annulled. Trade Annulment requests placed by third parties viz. Clearing Member / Trading Member other than executing trading members, shall not be accepted for processing.	Yes
2	Trade Annulment requests should be submitted to the Exchange within 30 minutes of the execution of trade	No
3	A Trade Annulment request can only be made for an order of a minimum value of Rs. 10 Crores	No
4	Minimum trade value of trade(s) originating from a single order for which annulment request is made should be Rs. 10 Lakhs or above	Yes
5	The trade(s) in question are not within the price bands / operating range / trade execution range applicable at the time of trade.	No
6	Trade(s) for which Annulment requests are submitted should have been executed in the continuous session Normal Market	Yes
7	Trade(s) have not been executed in Block deal session (BL) and QFI trades (IQ)	Yes
8	Trade(s) have not been executed with the same PAN number on both the buying and selling side.	Yes
9	Counterparty trading member should have provided acceptance to trade annulment in electronic form within 30 minutes after the market closure or within 30 minutes from time of trade annulment requests whichever is later. If the counterparty member does not intimate his consent within 30 minutes of market closure or within 30 minutes from time of trade annulment requests whichever is later, it will be deemed that the counterparty member does not consent to the request for annulment.	No
10	The executing member and the member on the other side of the said trade for a trade annulment request is not the same.	Yes

- 3.4. Considering the above, the Exchange vide its platform rejected the trade annulment request of Ventura on May 29, 2026 at 12:36 PM.
- 3.5. Subsequently, TM Ventura, submitted the trade annulment review request (TARR) on the same day.
- 3.6. The submissions of Ventura in its TARR are summarized as under:
 - 3.6.1. Mr. Ganesh Malviya placed order for the purchase in YESBANK contracts at an abnormal average price of Rs. 19.95. The order was placed at Rs.20.00 and was executed at an average price of Rs.19.95.
 - 3.6.2. The client had created a hedged position in YESBANK option contracts after depositing and maintaining the requisite margins prescribed by the Exchange. In the ordinary course, he placed the impugned order with the stated objective of covering his existing short position, and the order was executed within the price range and operating parameters permitted by NSE.
 - 3.6.3. However, upon a detailed examination of the circumstances surrounding the transaction, it became apparent that the order was not placed for any genuine trading purpose. Instead, the transaction appears to have been structured with the intention of artificially influencing the price of the contract and thereby causing a wrongful loss to Ventura. The manner in which the trade was executed, coupled with the prevailing market conditions, gives rise to a strong suspicion that the counterparty may have acted in concert or collusion with the client to facilitate the execution of the trade at an abnormal and unjustified price.
 - 3.6.4. Immediately upon detecting the suspicious nature of the transaction, Ventura submitted a request to NSE seeking annulment of the trade. However, the request was rejected solely on the ground that it had not been lodged within the prescribed period of 30 minutes from the execution of the trade. The rejection was made without examining the substantive merits of the case, or the exceptional circumstances involved.
 - 3.6.5. Being aggrieved by the said decision, Ventura submitted a review request before the competent authorities of NSE seeking reconsideration of the matter on merits.
 - 3.6.6. In parallel, considering the apparent manipulative conduct and possible criminal conspiracy involved in the transaction, Ventura lodged a formal

complaint with the Thane Police. Acting upon the complaint and the material placed before the police, the Thane Police issued directions to NSE and its clearing corporation not to release the payout arising from the impugned trade to the concerned counterparties. The matter is therefore under examination by both the regulatory and law enforcement authorities.

4. Proceedings of Regulatory Oversight Committee meeting held on 25-Jun-2026

- 4.1. The matter pertaining to the trade annulment request from Ventura was placed before the Committee in its present meeting held on June 25, 2026.
- 4.2. The Committee evaluated the review application submitted by Ventura for annulment of Trades (“Application”).
- 4.3. The Application along with the various details/responses provided by Applicant was placed before the Committee, for the purpose of considering the Application in terms of Byelaw 5 of Chapter VII of the NSE Byelaws, read with applicable Rules, Regulations and Circulars of the Exchange.

5. Considerations and deliberation of the Committee on the application of the Trade Annulment review request and subsequent submissions

- 5.1. The Committee noted that the trade annulment request did not fulfil the below mentioned criteria:
 - a) Trade Annulment requests should be submitted to the Exchange within 30 minutes of the execution of trade
 - b) A Trade Annulment request can only be made for an order of a minimum value of Rs. 10 Crores
 - c) The trade(s) in question are not within the price bands / operating range / trade execution range applicable at the time of trade.
 - d) Counterparty trading member should have provided acceptance to trade annulment in electronic form within 30 minutes after the market closure or within 30 minutes from time of trade annulment requests whichever is later. If the counterparty member does not intimate his consent within 30 minutes of market closure or within 30 minutes from time of trade annulment requests

whichever is later, it will be deemed that the counterparty member does not consent to the request for annulment.

- 5.2. The Committee further noted that the Trading Member (Applicant) is obligated to have an independent risk management system to manage its risks.
- 5.3. The Committee noted that the Exchange issued following circulars where the Trading Member has an obligation to place orders in a manner to ensure orderly markets. The list of circulars is as follows:

Sr. No.	Circular	Date of the Circular
1	Circular bearing ref no. NSE/FAOP/4746	20-Jan-04
2	Circular bearing reference no. NSE/FAOP/5856	22-Feb-05
3	Circular bearing reference no. NSE/INVG/2007/8719	23-Mar-07
4	Circular bearing reference no. NSE/SURV/49368	21-Aug-21

- 5.4. The Committee noted that the above-mentioned Exchange Circulars require all Trading Members to exercise due diligence and caution at the time of entering orders. The Committee finds that TM Ventura allowed its client to place and execute orders at prices significantly away from the prevailing market price, thereby failing to exercise due diligence.
- 5.5. The Exchange circular no. NSE/INVG/2007/8719 dated 23-Mar-2007 has advised the Trading Members to put in place appropriate internal systems and procedures for ensuring that orders which are away from the market price are not entered. Furthermore, vide Exchange circular dated 21-Aug-2021, an obligation is placed on all Trading Members to ensure that all the contracts are placed in a manner which ensures that the markets are 'fair' and 'orderly'.
- 5.6. The Committee found that the Trading Member has allowed the client to place the impugned orders at far away price. The Committee noted that Trading Member has allowed the client to place "Buy Order" with Limit price of Rs. 20.00/- when the previous closing price of the contract was Rs. 0.06/-. The limit price was 33,000% away from the previous close price of the contract and there was no corresponding movement in the underlying stock, hence, there was no economic rationale for buying a contract at prices 33,000% higher than the prevailing market price. Further, Trading Member did not have adequate risk management systems to cover losses arising from obligations if such orders are matched at such prices. Such orders at significantly far-away prices contributed to the matching of trades at prices which were not fair and did not result in orderly market. This clearly

demonstrates that the Trading Member while placing the orders, failed to take cognizance of the pre-trade risk controls and exercise due caution to ensure a fair and orderly market and hence did not comply with the NSE Circulars mentioned above.

6. Decision of the Committee

In light of all of the above and in the interest of the market and investors in general, the Committee reiterates that inviolability of trades is a sine qua non for the health and integrity of the Indian securities market and it is our considered view that the TARR Application cannot be admitted and the request for annulment of the trades cannot be accepted by the Exchange.

Sd/-

Shri. Srinivas Injeti
Chairman

Sd/-

Justice (Retd.) Smt. Abhilasha Kumari
Committee Member

Sd/-

Prof. (Dr.) Mamata Biswal
Committee Member

Sd/-

Shri P. R. Ramesh
Committee Member

Sd/-

Shri Sanjay Shorey
Executive Director

Date: 30-Jun-2026