

National Stock Exchange of India Limited Circular

DEPARTMENT: INSPECTION	
Download Ref No: NSE/INSP/61250	Date: March 21, 2024
Circular Ref. No: 19/2024	

To All Members,

Subject: Submission of VAPT Compliance Report for the FY 2023-24

Attention of Members is drawn to Exchange circular NSE/INSP/58471 dated September 20, 2023, regarding Submission of VAPT report and/or Action Taken Report (ATR)/Compliance Report.

Para 44 of SEBI Circular No. SEBI/HO/MIRSD/CIR/PB/2018/147 dated December 03, 2018 as amended vide SEBI Circular No. SEBI/HO/MIRSD/TPD/P/CIR/2022/80 dated June 07, 2022, requires that any gaps / vulnerabilities detected shall be remedied on immediate basis and compliance of closure of findings identified during VAPT shall be submitted to the Stock Exchanges within 3 months post the submission of final VAPT report.

Accordingly, members are required to submit VAPT Action Taken Report (ATR)/Compliance Report (Digitally signed by the CERT-In empaneled auditor and authorized official of the Member) in the format attached as **Annexure – A**. The guidelines for submitting the VAPT Action Taken Report (ATR)/ Compliance Report on Member portal provided earlier vide NSE Cir No-58471 dated September 20, 2023, is enclosed for reference as **Annexure – B**.

The due date of submission of Action Taken report (ATR)/Compliance Report is March 31, 2024.

Further, to ensure strict adherence to the regulatory requirements by members with the prescribed framework applicable for VAPT report and Compliance report for timely closure of vulnerabilities, penalties/disciplinary actions have been prescribed vide circular no NSE/INSP/57935 dated August 11, 2023, which shall be applicable for submissions of FY 2023-24 (Including Half yearly for QSB's) and onwards. The details of penalties/disciplinary actions are enclosed for reference as **Annexure-C**.

All Members are requested to take note of above and ensure timely submission of VAPT Action Taken Report (ATR)/ Compliance Report.

**For and on behalf of
National Stock Exchange of India Limited**

**Ajinkya Nikam
Senior Manager - Inspection**

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

Regional Office	CONTACT NO.	E MAIL ID
Ahmedabad (ARO)	079- 49008632	inspectionahm@nse.co.in
Chennai (CRO)	044- 66309915 /17	inspection_cro@nse.co.in
Delhi (DRO)	011-23459127 / 38 / 46	delhi_inspection@nse.co.in
Kolkata (KRO)	033-40400455/ 59	inspection_kolkata@nse.co.in
Mumbai (WRO)	022-26598200/022-61928200	compliance_wro@nse.co.in
Central Help Desk	compliance_assistance@nse.co.in	

Annexure-A
Format for VAPT Compliance/ATR
(On the letter head of the CERT-In empaneled entity)

Action Taken Report / Compliance Report on the non-conformities / vulnerabilities identified during the VAPT conducted during the FY. _____

Particulars	High	Critical	Medium	Low
No. of Open Vulnerabilities as reported in VAPT report submitted to the Exchange				
Current Status				

Explanation / Reason for non-closure

(To be filled in case of open vulnerabilities mentioned in current status)

Details of such open non-Conformities /Vulnerabilities*	Explanation / Reason for Non-Closure

* Open vulnerabilities shall attract appropriate disciplinary action by the exchange depending on the criticality / such other factors

Trading Member (TM) Name & TM Code:	
Auditor Name:	
Name of CERT-In empaneled entity:	
Sign:	

(To be digitally signed by CERT-In empaneled entity as appointed by the Member)

Annexure-B

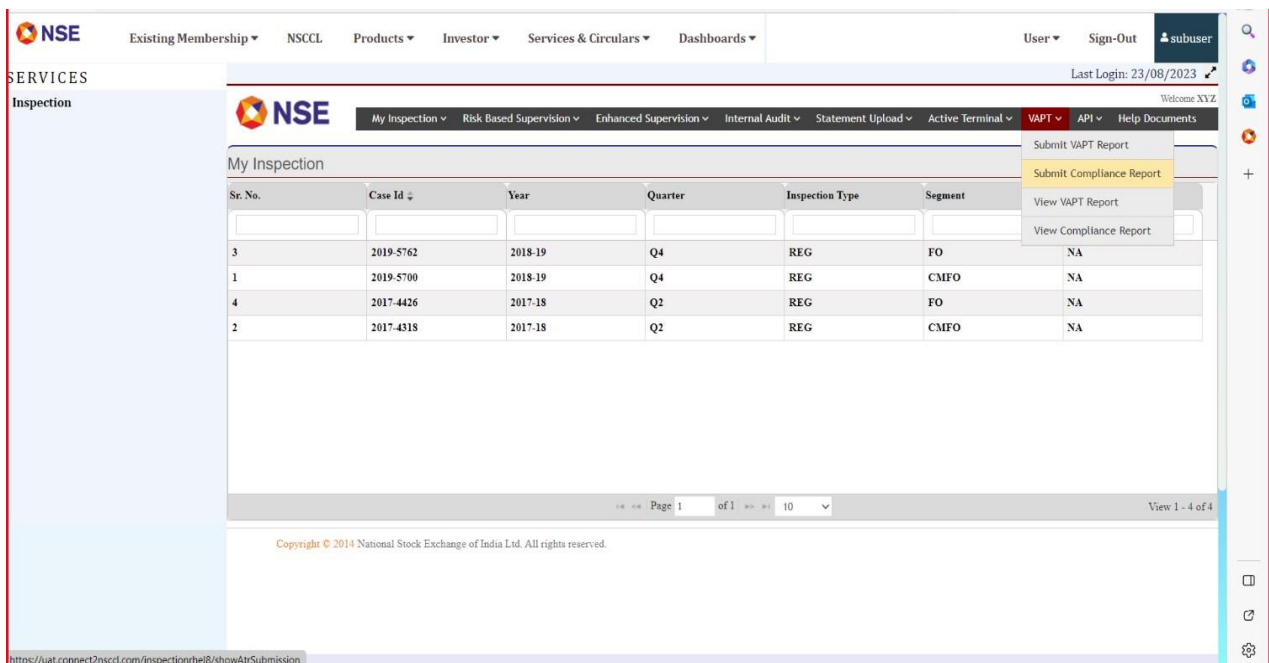
Guidelines for submitting the VAPT Compliance Report/Action Taken Report on Portal.

Step – 1

Log in to Members portal from your existing credentials. Then click on **Inspection Tab**

Step – 2

A separate VAPT module has been made available for members to submit the VAPT report. Click on **Submit Compliance report**.



The screenshot displays the NSE Members Portal interface. The top navigation bar includes 'Existing Membership', 'NSCL', 'Products', 'Investor', 'Services & Circulars', and 'Dashboards'. The user is logged in as 'subuser' with a last login of '23/08/2023'. The 'Inspection' tab is active, showing a table of inspections and a dropdown menu with the option 'Submit Compliance Report' highlighted.

Sr. No.	Case Id	Year	Quarter	Inspection Type	Segment	
3	2019-5762	2018-19	Q4	REG	FO	NA
1	2019-5700	2018-19	Q4	REG	CMFO	NA
4	2017-4426	2017-18	Q2	REG	FO	NA
2	2017-4318	2017-18	Q2	REG	CMFO	NA

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https://uat.connect2nscd.com/inspectionhel8/showAtrSubmission

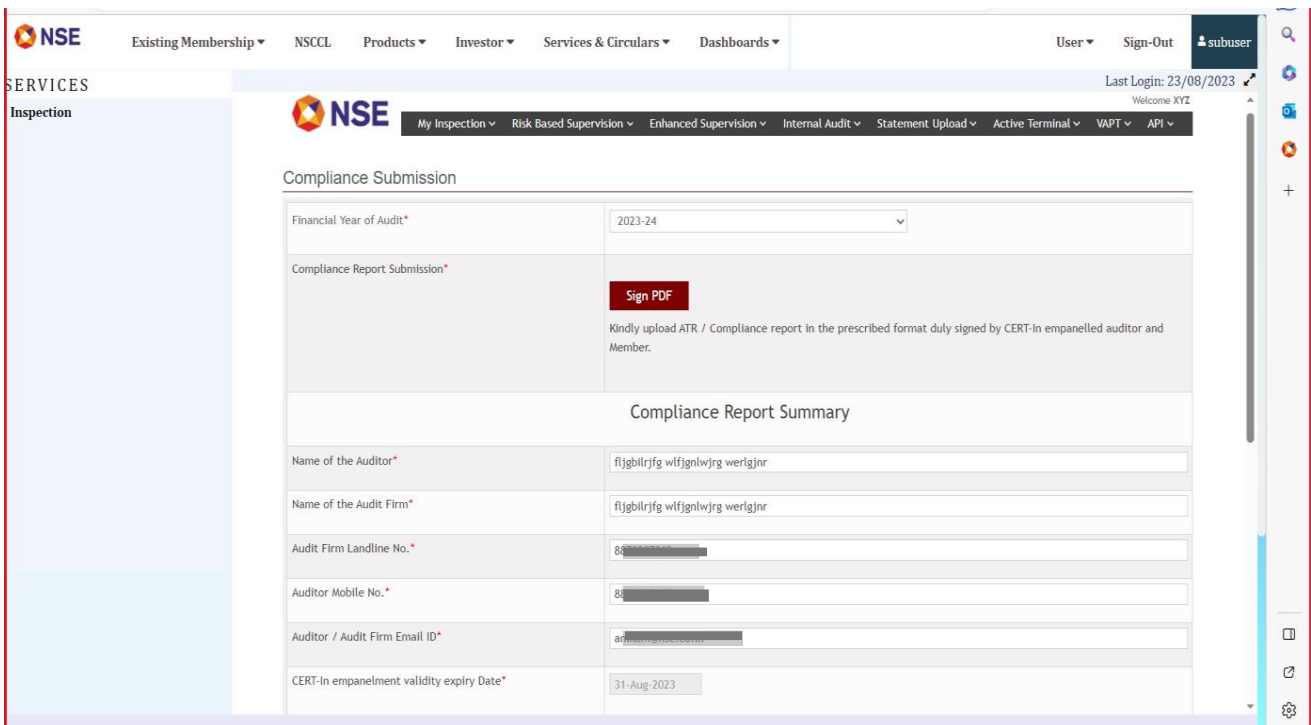
Step-3

By clicking “Submit Compliance report”, the screen displayed below would open.

Compliance report (as attached in **Annexure – A**) should be prepared and duly signed by the CERT-In empaneled entity who conducted the VAPT.

The report format should be PDF and the file should not be more than 10 MB in size.

By clicking “**Sign PDF**” icon, Member shall be required to select this Compliance report. (PDF format digitally signed by CERT-In empaneled entity).

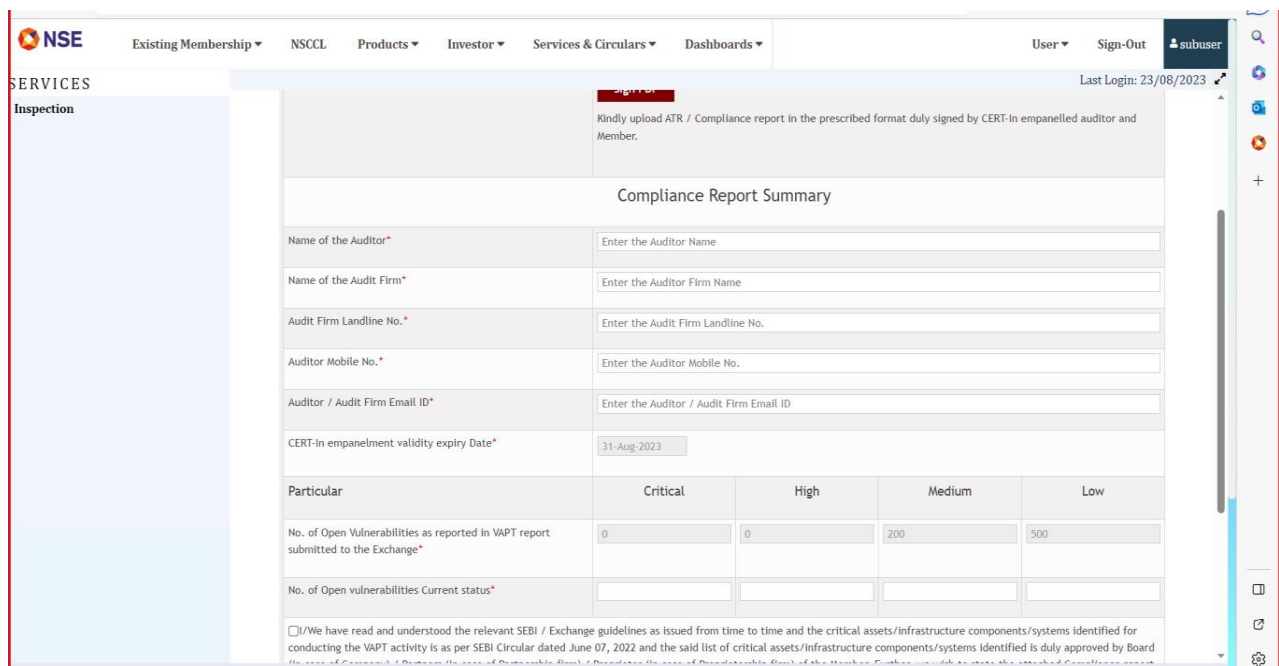


The screenshot displays the NSE Compliance Submission interface. At the top, there is a navigation bar with the NSE logo and various menu items like 'Existing Membership', 'NSCCL', 'Products', 'Investor', 'Services & Circulars', and 'Dashboards'. A user profile section shows 'User', 'Sign-Out', and 'subuser'. The main content area is titled 'Compliance Submission' and includes a dropdown for 'Financial Year of Audit' set to '2023-24'. Below this is a 'Compliance Report Submission' section with a prominent red 'Sign PDF' button and a note: 'Kindly upload ATR / Compliance report in the prescribed format duly signed by CERT-In empanelled auditor and Member.' A 'Compliance Report Summary' section follows, containing several input fields: 'Name of the Auditor', 'Name of the Audit Firm', 'Audit Firm Landline No.', 'Auditor Mobile No.', 'Auditor / Audit Firm Email ID', and 'CERT-In empanelment validity expiry Date' (set to 31-Aug-2023).

Step-4

After uploading the **VAPT Compliance report**, below screen will be displayed with details auto populated as reported in the VAPT submission.

If VAPT compliance report is signed by another auditor, Member shall be required to enter the details as displayed below: -



The screenshot shows the NSE VAPT Compliance Report Summary form. The form includes a navigation menu at the top with options like Existing Membership, NSCL, Products, Investor, Services & Circulars, and Dashboards. The user is logged in as 'subuser' with a last login of 23/08/2023. The form is titled 'Compliance Report Summary' and contains the following fields:

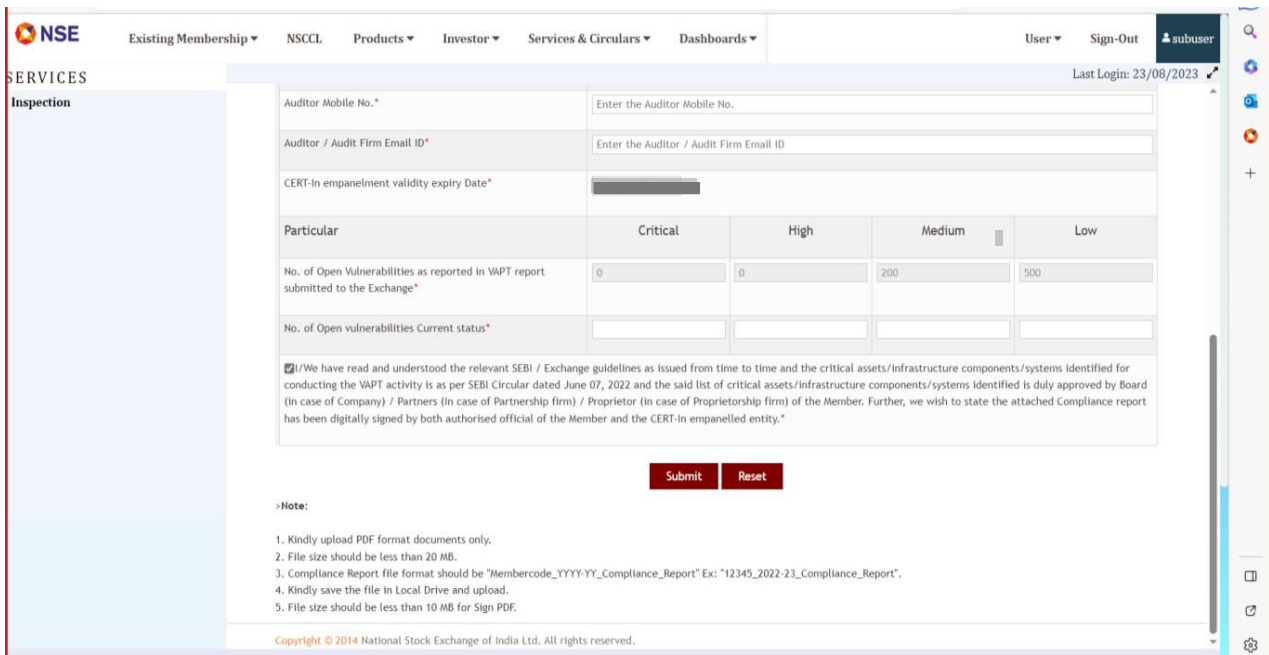
- Name of the Auditor*
- Name of the Audit Firm*
- Audit Firm Landline No.*
- Auditor Mobile No.*
- Auditor / Audit Firm Email ID*
- CERT-In empanelment validity expiry Date* (31-Aug-2023)

Particular	Critical	High	Medium	Low
No. of Open Vulnerabilities as reported in VAPT report submitted to the Exchange*	0	0	200	500
No. of Open vulnerabilities Current status*				

At the bottom of the form, there is a checkbox for the declaration: We have read and understood the relevant SEBI / Exchange guidelines as issued from time to time and the critical assets/infrastructure components/systems identified for conducting the VAPT activity is as per SEBI Circular dated June 07, 2022 and the said list of critical assets/infrastructure components/systems identified is duly approved by Board (in case of Corporate Members) / Partner (in case of Partnership firm) / Proprietor (in case of Proprietorship firm) of the Member. Further, we wish to state the attached Compliance report.

Step-5

Click on the checkbox for below highlighted undertaking and then click on “**Submit**” to complete the submission.



SERVICES
Inspection

Auditor Mobile No.*

Auditor / Audit Firm Email ID*

CERT-In empanelment validity expiry Date*

Particular	Critical	High	Medium	Low
No. of Open Vulnerabilities as reported in VAPT report submitted to the Exchange*	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="200"/>	<input type="text" value="500"/>
No. of Open vulnerabilities Current status*	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>

I/We have read and understood the relevant SEBI / Exchange guidelines as issued from time to time and the critical assets/infrastructure components/systems identified for conducting the VAPT activity is as per SEBI Circular dated June 07, 2022 and the said list of critical assets/infrastructure components/systems identified is duly approved by Board (In case of Company) / Partners (In case of Partnership firm) / Proprietor (in case of Proprietorship firm) of the Member. Further, we wish to state the attached Compliance report has been digitally signed by both authorised official of the Member and the CERT-in empanelled entity.*

Submit **Reset**

Note:

1. Kindly upload PDF format documents only.
2. File size should be less than 20 MB.
3. Compliance Report file format should be "Membercode_YYYY-YY_Compliance_Report" Ex: "12345_2022-23_Compliance_Report".
4. Kindly save the file in Local Drive and upload.
5. File size should be less than 10 MB for Sign PDF.

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Notes

1. Submitted reports would be available under “View Compliance Report” sub-tab.
2. In case a user is unable to submit the Compliance report due to any technical issue, kindly try submitting the Compliance report in Incognito mode. In case of any issue in uploading the report kindly send an email to dl-syscyb@nse.co.in

Annexure-C

Penalties/Disciplinary action(s) for Non-Submission of Compliance Report and/or non-closure of open vulnerabilities

Non-submission of Compliance Report within below specified dates by Members (other than QSB's):

Details of Violation	Penalty/disciplinary actions	Penalty/disciplinary action incase of repeated violation
<p>Non-submission of Compliance report on or before March 31.</p>	<ol style="list-style-type: none"> 1. Charges Rs. 1,500/- per day till first 7 calendar days or submission of report, whichever is earlier. 2. Charges of Rs. 2,500/- per day from the 8th calendar day to 21st calendar day or submission of report, whichever is earlier. 3. In case of non-submission of report till 21st calendar days, new client registration shall be prohibited and notice of 7 calendar days for disablement of trading facility till submission of report, shall be issued. 4. The disablement notice issued to the member will be shared with all the Exchanges for information. 5. In case of non-submission of report by 28th calendar day, Member shall be disabled in all segments till submission of report. 	<p>In case of a repeat instance by the Member, levy of applicable monetary penalty along with an escalation of 50%.</p> <p>In case of non-submission of report till 21st calendar days, new client registration shall be prohibited and notice of 7 calendar days for disablement of trading facility till submission of report, shall be issued.</p> <p>The disablement notice issued to the member will be shared with all the Exchanges for information.</p> <p>In case of non-submission of report by 28th calendar day, Member shall be disabled in all segments till submission of report.</p>

Non-submission of Compliance Report within below specified dates by QSB's Members:

Details of Violation	Penalty/disciplinary actions	Penalty/disciplinary action in case of repeated violation
<p>Non-submission of Compliance report on or before September 30/ March 31.</p>	<ol style="list-style-type: none"> 1. Charges Rs. 3,000/- per day till the first 7 calendar days or submission of report, whichever is earlier. 2. Charges of Rs. 5,000/- per day from the 8th calendar day to 21st calendar day or submission of report, whichever is earlier. 3. In case of non-submission of report till 21st calendar days, new client registration shall be prohibited and notice of 7 calendar days for disablement of trading facility till submission of report, shall be issued. 4. The disablement notice issued to the member will be shared with all the Exchanges for information. 5. In case of non-submission of report by 28th calendar day, Member shall be disabled in all segments till submission of report. 	<p>In case of a repeat instance by the Member, levy of applicable monetary penalty along with an escalation of 50%.</p> <p>In case of non-submission of report till 21st calendar days, new client registration shall be prohibited and notice of 7 calendar days for disablement of trading facility till submission of report, shall be issued.</p> <p>The disablement notice issued to the member will be shared with all the Exchanges for information.</p> <p>In case of non-submission of report by 28th calendar day, Member shall be disabled in all segments till submission of report.</p>

Penalty/Disciplinary actions applicable in case of non-closure of per open vulnerabilities as reported in VAPT report within period of 3 months as specified here under: -

Categories of Risks	For All Members (other than QSBs)	For QSB Members
		Non closure of open vulnerabilities by March 31
High/critical Risk	Rs.50,000/-	Rs.1,00,000/-
Medium Risk	Rs.25,000/-	Rs.50,000/-
Low Risk	Rs.10,000/-	Rs.20,000/-

Apart from the monetary penalty mentioned above, if **High/Critical/Medium** vulnerability is not closed by member within 21 days from the due date of submission of compliance report, new client registration shall be prohibited and notice of 7 days for disablement of trading facility shall be issued. If the vulnerability is not closed during this notice period, then member shall be disabled in all segments till closure of the vulnerability. The disablement notice issued to the member will be shared with all the Exchanges for information.