Activity wise sampling details						
Sr. No.	Area	Count for the audit period (total number of demat request and remat request confirmed / rejected, etc.)	No. of samples checked	Percentage of samples checked		
1	Demat Confirmation {number of samples checked must include transposition cum demat and transmission cum demat cases} (atleast 25%)					
2	Demat Rejection (atleast 25%)					
3	Remat Confirmation (atleast 25%)					
4	Remat Rejection (atleast 25%)					
5	Investor Grievances received in respect of depository operations received by RTA / Issuer (100%)					
6	Reconciliation (atleast for two different dates for all the ISINs (100%) associated with the RTA)					
7	Transfer and Transmission of locked in securities & of securities where ISIN is suspended (atleast 25%)					
8	Redemption					
9	Activity wise sampling details only applicable for RTAs servicing Mutual Funds					
9.1	Conversion Confirmation {number of samples checked must include transmission cum demat cases} (atleast 25%)					
9.2	Conversion Rejection (atleast 25%)					
9.3	Reconversion Confirmation (atleast 25%)					
9.4	Reconversion Rejection (atleast 25%)					
9.5	Redemption/Repurchase					
10						
10.1	Listed - Full Connectivity					
10.2	Listed - Part Connectivity					
10.3	Unlisted - Full Connectivity					
10.4	Unlisted - Part Connectivity					

	Checklist			
Sr. No.	Audit Areas	Auditor's Observation	Auditor's Remarks	Management's Comment*
1	Demat / Remat / Conversion / Reconversion / Redemption /Repurchase Requests Processing			
1.1	Whether there is a proper procedure in place for inward of requests received from Participants?	🗆 Yes 🗆 No	If no, discrepancies must be mentioned here	
1.2	Whether adequate controls exists over requests received and their respective status?	□ Yes □ No □ Not Applicable	If no, discrepancies must be mentioned here	
1.3	Whether serial number and stamp of date of receipt has been affixed on the requests received by the RTA/Issuer connected to NSDL?		If no, discrepancies must be mentioned here	
1.4	Whether the requests received during the audit period have been processed within the stipulated time frame?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
1.5	Whether date of receipt mentioned on the requests matches with the receipt date entered in the NSDL system?		If no, then number of cases with discrepancies must be mentioned here	
1.6	Whether request forms received were duly authorised by the Participant and were completely filled?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
2	Demat Request Confirmation			
2.1	While processing demat request, whether the validity of the physical security certificate(s) or the Letter of Confirmation is verified?		If no, then number of cases with discrepancies must be mentioned here	
2.2	While processing demat request, whether the RTA/Issuer connected to NSDL verifies whether the application for demat has been made by the person(s) whose name is recorded in the Register of member?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
2.3	Whether register of member (ROM) is updated before confirmation of demat requests?	□ Yes □ No	If no, then number of cases with	

2.3	Whether register of member (ROM) is updated	$\Box$ Yes	$\square$ No	If no, then number	
	before confirmation of demat requests?			of cases with	
				discrepancies must	
				be mentioned here	

2.4	Whether RTA/Issuer connected to NSDL	$\Box$ Yes $\Box$ No	If no, then number of cases with	
	transfers the registered ownership of			
	securities to the name of National Securities		discrepancies must	
	Depository Limited when the demat requests		be mentioned here	
	are processed?			
2.5	While processing demat request, whether the	$\Box$ Yes $\Box$ No	If no, then number	
	RTA/Issuer connected to NSDL verifies the	□ Not	of cases with	
	details mentioned in the DRF and as	Applicable	discrepancies must	
	appearing on the physical security		be mentioned here	
	certificate(s) with the details received			
	electronically?			
2.6	While processing demat request, whether the	$\Box$ Yes $\Box$ No	If no, then number	
	RTA verifies the signature of the applicant(s)	□ Not	of cases with	
	with the signature as available in record of the	Applicable	discrepancies must	
	RTA/Issuer connected to NSDL?	ripplicable	be mentioned here	
2.7	Whether Certificates received with requests	□ Yes □ No	If no, then number	
2.1	were marked with words "Surrendered for		of cases with	
	Dematerialisation", two parallel lines across		discrepancies must be mentioned here	
	the certificate, two holes punched on the		be mentioned here	
	company name in the prescribed manner, DP			
	ID and client ID mentioned on the certificate?	<b>X</b> 7 <b>X</b> 7		
2.8	Whether only those securities have been	$\Box$ Yes $\Box$ No	If no, then number	
	dematerialised by RTA/Issuer connected to		of cases with	
	NSDL for which listing approval has been		discrepancies must	
	received from the relevant stock exchange(s)?		be mentioned here	
2.9	Whether Issuer/RTA has accepted the demat	$\Box$ Yes $\Box$ No	If no, then number	
	request, wherein physical security	□ Not	of cases with	
	certificate(s) have got lost in transit, and	Applicable	discrepancies must	
	carried out the dematerialisation on the basis		be mentioned here	
	of indemnity and proof of dispatch furnished			
	by the Participant as per prescribed			
	guidelines?			
2.10	Whether any requests have been confirmed	⊓ Yes ⊓ No		
	where there exists any prohibitory order, stop			
	transfer, attachment order, or disputed title on			
	the said securities?	rppileable		
2.11	If reply to 2.10 above is yes, mention the			
2.11				
	number of cases along with details of the			
2.12	matter.	$-\mathbf{V}_{\mathbf{r}}-\mathbf{x}_{\mathbf{r}}$	If we draw 1	
2.12	Whether proper internal controls are in place		If no, then number	
	for processing transposition cum demat		of cases with	
	requests received from Participants?	Applicable	discrepancies must	
			be mentioned here	
2.13	Whether RTA/Issuer connected to NSDL is	$\Box$ Yes $\Box$ No	If no, then number	
	processing dematerialization request in	□ Not	of cases with	
	respect of the remaining physical shares in	Applicable	discrepancies must	
	line with guidelines issued under NSDL	**	be mentioned here	
	Circular 24/2019 dated November 18, 2019			
	(SEBI Circular No. 2019/ 122 dated			
	November 5, 2019) with respect of Enhanced			
	due diligence for dematerialization of			
	physical securities. ?			
L	physical securities. :			

2.14	Whether RTA/Issuer connected to NSDL has obtained the additional documents explaining the difference in name in line with guidelines issued under NSDL Circular 24/2019 dated November 18, 2019 (SEBI Circular No.2019/122 dated November 5, 2019) with respect to instances, where flags/alerts have been generated by Depository for mismatch of name on the share certificate (s) vis a vis name of the BO of demat account. Whether RTA/Issuer connected to NSDL	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here If no, then number	
	follows operational guidelines for transfer and Dematerialization of re-lodged physical shares in line with guidelines issued under NSDL Circular 47/2020 dated December 11, 2020 (SEBI Circular No.2020/236 dated December 2, 2020)	□ Not Applicable	of cases with discrepancies must be mentioned here	
2.16	Whether RTA accepted partial dematerialisation i.e. entire request is not rejected or returned where only a part of request to be rejected?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
3	Demat Request Rejection	<b>X</b> 7 <b>X</b> 7		
3.1	Whether rejection memos have been sent within five days of rejection?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
3.2	Whether rejection memo contains DP ID, client ID, rejection code and rejection reason?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
3.3	Whether rejection code and rejection reason as mentioned in the rejection memo matches with that captured in the NSDL system?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
3.4	Whether the rejection code and rejection reason selected by RTA/Issuer connected to NSDL for rejecting the request were correct?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
3.5	Whether certificates or letter of confirmation and physical documents are sent to the concerned Participant within 5 days of rejection of demat request?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
3.6	Whether proof of despatch for request rejections has been properly maintained by the RTA/Issuer connected to NSDL?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
3.7	Whether rejection memos have been sent only after rejecting the requests in NSDL system?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
4	Conversion Request Confirmation			

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4.1	While processing conversion request, whether	$\Box$ Yes $\Box$ No	If no, then number	
	the RTA/Issuer connected to NSDL verifies	□ Not	of cases with	
	the details mentioned in the CRF with that	Applicable	discrepancies must	
	recorded on the SOA and with details as		be mentioned here	
	received electronically?			
4.2	Whether any requests have been confirmed	$\Box$ Yes $\Box$ No		
	where there exists any prohibitory order, stop	□ Not		
	transfer, attachment order, or disputed title on	Applicable		
	the said mutual fund (MF) units?	11		
4.3	If reply to 4.2 above is yes, mention the			
	number of cases along with details of the			
	matter.			
4.4	While processing conversion request, whether	□ Yes □ No	If no, then number	
	the RTA verifies the signature of the	□ Not	of cases with	
	applicant(s) with the signature as available in	Applicable	discrepancies must	
	record of the RTA/Issuer connected to NSDL?	11	be mentioned here	
4.5	Whether conversion request form of	$\Box$ Yes $\Box$ No	If no, then number	
	Alternative Investment Fund (AIF) units are	□ Not	of cases with	
	processed in accordance with SEBI/ NSDL	Applicable	discrepancies must	
	guidelines?	11	be mentioned here	
5	Conversion Request Rejection			
5.1	Whether rejection memos along with SOA	$\Box$ Yes $\Box$ No	If no, then number	
_	have been sent in cases of rejections and proof	□ Not	of cases with	
	of dispatch maintained?	Applicable	discrepancies must	
			be mentioned here	
5.2	Whether rejection code and rejection reason as	$\Box$ Yes $\Box$ No	If no, then number	
	mentioned in the rejection memo matches with	$\square$ Not	of cases with	
	that captured in the NSDL system?	Applicable	discrepancies must	
		- PP	be mentioned here	
5.3	Whether the rejection code and rejection	$\Box$ Yes $\Box$ No	If no, then number	
	reason selected by RTA/Issuer connected to	$\square$ Not	of cases with	
	NSDL for rejecting the request, was correct?	Applicable	discrepancies must	
		TT	be mentioned here	
6	Remat Request Confirmation			
-	1			

6.1	Whether RTA/Issuer connected to NSDL transfers the registered ownership of securities from the name of National Securities Depository Limited to the name of the BO when the remat requests are processed?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
6.2	Whether certificates are sent within period of 30 days from the date of receipt of remat request?		If no, then number of cases with discrepancies must be mentioned here	
6.3	Whether proof of despatch of physical certificates has been properly maintained by RTA/Issuer connected to NSDL?		If no, then number of cases with discrepancies must be mentioned here	
7	Remat Rejection			

7.1	Whether rejection memos have been sent in all cases of rejections within five days of rejection? Whether rejection memo contains DP ID,	□ Not Applicable □ Yes □ No	If no, then number of cases with discrepancies must be mentioned here If no, then number	
	client ID, rejection code and rejection reason?	□ Not Applicable	of cases with discrepancies must be mentioned here	
7.3	Whether rejection code and rejection reason as mentioned in the rejection memo matches with that captured in the NSDL system?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
7.4	Whether the rejection code and rejection reason selected by RTA/Issuer connected to NSDL for rejecting the request were correct?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
7.5	Whether proof of despatch for request rejections has been properly maintained by the RTA/Issuer connected to NSDL?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
7.6	Whether rejection memos have been sent only after rejecting the requests in NSDL system?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
8	Reconversion/Redemption/Repurchase Request Confirmation			

8.1	Whether units at the time of reconversion	$\Box$ Yes $\Box$ No	If no, then number	
	have been issued to the persons as per the	$\square$ Not	of cases with	
	pattern of holdings in the account of the	Applicable	discrepancies must	
	Participant from which such units are		be mentioned here	
	reconverted?			
9	Reconversion Request			
	<b>Rejection/Redemption/Repurchase</b>			
	rejection			
9.1	Whether rejection memos have been sent in	$\Box$ Yes $\Box$ No	If no, then number	
	all cases of rejections?	□ Not	of cases with	
	-	Applicable	discrepancies must	
		**	be mentioned here	
9.2	Whether rejection code and rejection reason as	$\Box$ Yes $\Box$ No	If no, then number	
	mentioned in the rejection memo matches with		of cases with	
	that captured in the NSDL system?	Applicable	discrepancies must	
	1 5	11	be mentioned here	
9.3	Whether the rejection code and rejection	$\Box$ Yes $\Box$ No	If no, then number	
	reason selected by RTA/Issuer connected to		of cases with	
	NSDL for rejecting the request was correct?	Applicable	discrepancies must	
	5 6 1	11	be mentioned here	
10	IPO/Corporate Actions			
10.1	Whether Corporate Actions processed during	$\Box$ Yes $\Box$ No	If no, then details	
	the audit period have been carried out in		of discrepancies	
	accordance with SEBI/ NSDL guidelines?	Applicable	must be mentioned	
	5		here	

10.2	Whether in case of securities listed on stock	$\Box$ Yes $\Box$ No	If no, then details	
	exchanges, electronic payment modes	□ Not	of discrepancies	
	approved by RBI such as ECS, NEFT etc. are	Applicable	must be mentioned	
	being used to make cash payment to investors		here	
	in their bank accounts taken directly from			
	their demat accounts?			
10.3	Whether in case where either the bank details	$\Box$ Yes $\Box$ No	If no, then details	
	such as MICR, IFSC etc. that are required for	□ Not	of discrepancies	
	making electronic payment are not available	Applicable	must be mentioned	
	or the electronic payment instructions have		here	
	failed or have been rejected by the bank, cash			
	payments made through physical payment			
	instruments for distribution of cash benefits			
	have the bank account details taken directly			
	from demat accounts of investors printed on			
	such instruments?			
10.4	Whether any unclaimed shares (i.e., shares	$\Box$ Yes $\Box$ No	If no, then number	
	which could not be allotted to the rightful		of cases with	
	shareholder due to insufficient/incorrect		discrepancies must	
	information or any other reason) have been		be mentioned here	
	credited to suspense account?			
10 -		• • •		I
10.5	Whether details of shareholding of each	$\Box$ Yes $\Box$ No	If no, then number	
	allottee whose shares have been credited to		of cases with	
	suspense account is properly maintained by		discrepancies must	
10.6	the Issuer?	<b>X7</b> X7	be mentioned here	
10.6	In case if the RTA/Issuer connected to NSDL	$\Box$ Yes $\Box$ No	If no, then number	
	has transferred any shares out of the said		of cases with	
	suspense account during the audit period,		discrepancies must be mentioned here	
	whether the same was as per the stipulated		be mentioned here	
10.7	procedure? Whether in case of redemptions, RTA/Issuer	□ Yes □ No	If no, then number	
10.7	connected to NSDL has made payment		of cases with	
	towards repurchase / redemption to the		discrepancies must	
	clients?		be mentioned here	
10.8	Whether RTA/Issuer connected to NSDL	□ Yes □ No	If no, then number	
10.8	verifies name of the investor(s) as appearing		of cases with	
	on the Issue Application Form with that as		discrepancies must	
	obtained from NSDL?		be mentioned here	
10.9	Whether the name of National Securities	□ Yes □ No	If no, then details	
10.7	Depository Limited (NSDL) is recorded as		of discrepancies	
	"Registered owner of Securities" in the		must be mentioned	
	Register of Members for securities allotted		here	
	in electronic form in NSDL?			
10.10	Whether for locations where facility of ECS	□ Yes □ No	If no, then details	
10.10	is available, bank details of applicants have	$\square$ Not	of discrepancies	
	been taken directly from demat accounts of	Applicable	must be mentioned	
	the applicants in respect of refund in public /	PPilouoie	here	
	rights issues made completely in demat			
	form?			
11	Reconciliation			
11.1	Whether separate folios for NSDL & CDSL	□ Yes □ No		
11.1	are maintained in backoffice?			
L	are manualled in ouekonnee;			

11.2       What is the mechanism of carrying out daily       □ Manual       □         11.3       Whether reconciliation       □ Yes       □ No         11.3       Whether reconciliation between NSDL       □ Yes       □ No         control position and Register of Members is       □ Yes       □ No         11.4       If reply to 11.3 above is no, then mention the frequency at which reconciliation is being carried out.       □ Yes       □ No         11.5       Whether reconciliation mismatch was observed?       □ Yes       □ Not daptication mismatch report to NSDL?       □ Yes       □ Not daptication mismatch report to NSDL?         11.7       Whether RTA/Issuer connected to NSDL is reconciliation figures?       □ Yes       □ Not dascerpancies must be mentioned here         11.7       Whether RTA/Ussuer connected to NSDL is records for pending remat?       □ Yes       □ Not discerpancies must be mentioned here         11.8       Whether arithmetic sum of shares in NSDL       □ Yes       □ No       If no, then number of cases with discerpancies must be mentioned here         11.9       Whether RTA has a suitable SOP to handle       □ Yes       □ No       If no, then number of cases with discerpancies must be mentioned here         11.10       Whether RTA does not have any instance(s)       □ Yes       □ No       If no, then number of cases with discerepancies must be mentioned here <tr< th=""><th></th><th></th><th>-</th><th></th><th></th></tr<>			-		
control position and Register of Members is carried out on a daily basis by RTA/Issuer connected to NSDL as per SEB/NSDL guidelines?       III 4       If reply to 11.3 above is no, then mention the frequency at which reconciliation is being carried out.         11.5       Whether reconciliation mismatch was observed?       □ Yes □ No observed?       If no, then number of cases with discrepancies must be mentioned here         11.6       If reply to 11.5 above is yes, whether RTA / □ Yes □ No observed?       If no, then number of cases with discrepancies must be mentioned here         11.7       Whether RTA/Issuer connected to NSDL is nation figures?       □ Yes □ No of cases with discrepancies must be mentioned here         11.8       Whether RTA/Issuer connected to NSDL is negative for recording the reconcilation figures?       □ Yes □ No of cases with discrepancies must be mentioned here         11.8       Whether arithmetic sum of shares in NSDL system, in CDSL system and shares held in physical form is equal to the total issued capital of the company?       □ Yes □ No of cases with discrepancies must be mentioned here         11.10       Whether RTA has a suitable SOP to handle net request instead of rejection, if any in accordance with NSDL circular NSDL/CIR/II/32/2023 dated August 17, 2023?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.11       Whether RTA has a suitable SOP to handle net request instead of rejection, if any in accordance with NSDL       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         <	11.2	What is the mechanism of carrying out daily reconciliation?			
infequency at which reconciliation is being carried out.       Image: carried out.         11.5       Whether reconciliation mismatch was observed?       □ Yes □ No         11.6       If reply to 11.5 above is yes, whether RTA/ inserved?       □ Yes □ No         11.7       Whether reconciliation mismatch was observed?       □ Yes □ No         11.7       Whether report to NSDL?       □ Yes □ No         11.7       Whether RTA/Issuer connected to NSDL is □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.8       Whether the back office records are reconciled with the NSDL records for pending remat?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.9       Whether arithmetic sum of shares in NSDL □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.9       Whether RTA has a suitable SOP to handle □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.10       Whether RTA has a suitable SOP to handle □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.11       Whether RTA does not have any instance(s)       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.19       Whether RTA does not have any instance(s)       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here	11.3	control position and Register of Members is carried out on a daily basis by RTA/Issuer connected to NSDL as per SEBI/NSDL	□ Yes □ No		
observed?         11.6       If reply to 11.5 above is yes, whether RTA / Issuer connected to NSDL has sent any mismatch report to NSDL?       □ Not Applicable       If no, then number of cases with discrepancies must be mentioned here         11.7       Whether RTA/Issuer connected to NSDL is maintaining a register for recording the reconciliation figures?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.8       Whether the back office records are reconciled with the NSDL records for pending remat?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.9       Whether arithmetic sum of shares in NSDL expited of the company?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.10       Whether RTA has a suitable SOP to handle instance(s) of erroneous confirmation of the demat request instead of rejection, if any in accordance with NSDL circular NSDL/CIR/II/33/2023 dated August 17, 2023?       If no, then number of cases with discrepancies must be mentioned here         11.11       Whether RTA does not have any instance(s) of erroneous confirmation of the demat request instead of rejection reported resulting in mismatch in share capital?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.11       Whether RTA does not have any instance(s) of erroneous confirmation of the demat request instead of rejection reported ker entioned here       □ Yes □ No       If no, then details of discrepancies must be mentioned here	11.4	frequency at which reconciliation is being			
Issuer connected to NSDL has sent any mismatch report to NSDL?       □ Not Applicable       of cases with discrepancies must be mentioned here         11.7       Whether RTA/Issuer connected to NSDL is maintaining a register for recording the reconciliation figures?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.8       Whether the back office records are reconciled with the NSDL records for pending remat?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.9       Whether arithmetic sum of shares in NSDL system, in CDSL system and shares has use capital of the company?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.10       Whether RTA has a suitable SOP to handle instance(s) of erroneous confirmation of the demat request instead of rejection, if any in accordance with NSDL circular NSDL/CIR/I/32/2023 dated August 17, 2023?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.11       Whether RTA does not have any instance(s) of erroneous confirmation of the demat request instead of rejection reported resulting in mismatch in share capital?       □ Yes □ No       If no, then details of discrepancies must be mentioned here         12.11       Whether there is any system to record & redress all grievances of clients?       □ Yes □ No       If no, then details of discrepancies must be mentioned here         12.2       Whether the Action Taken Report ("ATR") has been submitted to SEBI within 21 calendar da	11.5		□ Yes □ No		
Issuer connected to NSDL has sent any mismatch report to NSDL?       □ Not Applicable       of cases with discrepancies must be mentioned here         11.7       Whether RTA/Issuer connected to NSDL is maintaining a register for recording the reconciliation figures?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.8       Whether the back office records are reconciled with the NSDL records for pending remat?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.9       Whether arithmetic sum of shares in NSDL system, in CDSL system and shares has use capital of the company?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.10       Whether RTA has a suitable SOP to handle instance(s) of erroneous confirmation of the demat request instead of rejection, if any in accordance with NSDL circular NSDL/CIR/I/32/2023 dated August 17, 2023?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.11       Whether RTA does not have any instance(s) of erroneous confirmation of the demat request instead of rejection reported resulting in mismatch in share capital?       □ Yes □ No       If no, then details of discrepancies must be mentioned here         12.11       Whether there is any system to record & redress all grievances of clients?       □ Yes □ No       If no, then details of discrepancies must be mentioned here         12.2       Whether the Action Taken Report ("ATR") has been submitted to SEBI within 21 calendar da					
11.7       Whether RTA/Issuer connected to NSDL is maintaining a register for recording the reconciliation figures?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.8       Whether the back office records are records are reconciled with the NSDL records for pending remat?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.9       Whether arithmetic sum of shares in NSDL system, in CDSL system and shares held in physical form is equal to the total issued capital of the company?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.10       Whether RTA has a suitable SOP to handle instance(s) of erroneous confirmation of the demat request instead of rejection, if any in accordance with NSDL circular NSDL/CIR/II/33/2023 dated August 17, 2023?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.1       Whether RTA does not have any instance(s) of erroneous confirmation of the demat request instead of rejection reported resulting in mismatch in share capital?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.1       Whether RTA does not have any instance(s) □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.1       Whether RTA does not have any instance(s) □ Yes □ No       If no, then details of discrepancies must be mentioned here         12.1       Whether RTA does not have any instance(s) □ Yes □ No       If no,	11.6	Issuer connected to NSDL has sent any	□ Not	of cases with	
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11.8       Whether the back office records are reconciled with the NSDL records for pending remat?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.9       Whether arithmetic sum of shares in NSDL is system, in CDSL system and shares held in physical form is equal to the total issued capital of the company?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         11.10       Whether RTA has a suitable SOP to handle instance(s) of erroneous confirmation of the demat request instead of rejection, if any in accordance with NSDL circular NSDL/CIR/II/33/2023 dated August 17, 2023?       If no, then number of cases with discrepancies must be mentioned here         11.11       Whether RTA does not have any instance(s) of erroneous confirmation of the demat request instead of rejection reported resulting in mismatch in share capital?       □ Yes □ No       If no, then number of cases with discrepancies must be mentioned here         12.1 <i>IVVESTOR GRIEVANCES</i> □       Yes □ No       If no, then details of discrepancies must be mentioned here         12.2.2       Whether there is any system to record & redress all grievances of clients?       □ Yes □ No       If no, then details of discrepancies must be mentioned here         12.3       Whether grievance received from Beneficial Owner directly is also reported in grievance received from Beneficial □ Yes □ No       If no, then details of discrepancies must be mentioned here         12.3       Whether grievance received from Beneficial □ Yes □ No       If no, t					
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Owner directly is also reported in grievance report submitted to NSDL?D Not Applicableof discrepancies must be mentioned	12.3		□ Yes □ No		
report submitted to NSDL? Applicable must be mentioned				-	
here					
				here	

12.4	Whether quarterly investor grievance reports have been submitted to NSDL as per SEBI / NSDL guidelines within stipulated timelines?	□ Yes □ No	If no, then details of discrepancies must be mentioned here	
13	Record Maintenance			
13.1	Whether Issuer or its Registrar and Transfer Agent maintain the records relating to its Depository related business activities such as demat / remat / conversion / reconversion as per the period prescribed under NSDL guidelines?	□ Yes □ No	If no, then number of cases with discrepancies must be mentioned here	
13.2	Whether all documents related to Corporate Actions are maintained ?	🗆 Yes 🗆 No	If no, discrepancies must be mentioned here	
13.3	Whether RTA has a process to maintain a record of the destroyed certificates?	🗆 Yes 🗆 No	If no, discrepancies must be mentioned here	
14	Status of compliance for deviations / observ / concurrent audit report	vations noted in	n last NSDL inspection	on and internal
14.1	Whether RTA/Issuer connected to NSDL has complied with all the deviations noted during last NSDL inspection?		If no, then details of the non compliance must be mentioned here	
14.2	Whether RTA/Issuer connected to NSDL has taken adequate preventive measures in respect of deviations noted during last NSDL inspection?	□ Yes □ No □ Not Applicable		
14.3	Whether RTA / Issuer connected to NSDL has taken adequate preventive and corrective measures in respect of deviations noted during last internal audit?	□ Not	If no, then details of the non compliance must be mentioned here	
14.4	Whether NSDL has sought any specific comment from auditor with respect to any issue?	□ Yes □ No	If yes, then provide details / comments on issues	
14.5	Whether NSDL has sought any specific certification from auditor with respect to any issue?	□ Yes □ No	If yes, provide details along with supporting documents	
15	Reporting by RTA/Issuer connected to NSDL to its Board of Directors			
15.1	Whether RTA/ Issuer connected to NSDL has placed last inspection findings alongwith management comment before its Board of Directors? ( <i>same may be verified from the</i> <i>extract of the minutes of the Board Meeting</i> )	□ Yes □ No □ Not Applicable	If yes, then mention date of the Board Meeting	

15.2	Whether RTA/Issuer connected to NSDL has placed last internal audit findings alongwith management comment before its Board of Directors? (same may be verified from the extract of the minutes of the Board Meeting)	□ Yes □ No □ Not Applicable	If yes, then mention date of the Board Meeting	
16	Miscellaneous			
16.1	Whether change in office address (Registered / Corporate) and / or investor relations officer / Compliance officer / contact details of RTA / Issuer connected to NSDL has been communicated to NSDL as per prescribed guidelines?	□ Yes □ No □ Not Applicable	If no, then details of discrepancies must be mentioned here	
16.2	Whether RTA is updating Distinctive Number (DN) information in respect of all physical share capital and overall DN range for dematerialised share capital for all listed companies in the manner prescribed by SEBI?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here	
16.3	Whether common agency requirement as prescribed by SEBI is being adhered to with respect to all the companies handled by the RTA?	□ Yes □ No	If no, then number of cases with discrepancies must be mentioned here	
16.4	While processing demat request, whether name and specimen signature of authorised signatory is obtained by the RTA handling only electronic connectivity?	□ Yes □ No □ Not Applicable	If no, then details of discrepancies must be mentioned here	
16.5	While processing demat request, whether confirmation received from the company is compared with the list of authorised signatories before updating system by the RTA handling only electronic connectivity?	□ Yes □ No □ Not Applicable	If no, then details of discrepancies must be mentioned here	
16.6	Whether the RTA handling only electronic connectivity ensures that no activity is carried out in case of companies who have not provided specimen signatures of the authorized signatories?	□ Yes □ No □ Not Applicable	If no, then details of discrepancies must be mentioned here	
16.7	Whether Issuer connected to NSDL / RTA has processed requests for transfer of locked- in securities or securities held under suspended ISIN in case of account closure (inter-depository) and transmission (intra depository and inter-depository) as per prescribed guidelines?	□ Yes □ No □ Not Applicable	If no, then number of cases with discrepancies must be mentioned here.	
16.8	Whether depository operations handled by RTA / Issuer connected to NSDL are in accordance with SEBI/ NSDL guidelines?	□ Yes □ No □ Not Applicable	If no, details of discrepancies must be mentioned here	

16.9	Whether the Issuer having connectivity with	$\Box$ Yes $\Box$ No	If no, details of	
	NSDL and handling registry operations in-	□ Not	discrepancies must	
	house, has more than one lac share	Applicable	be mentioned here	
	holders?			

16. 10	If reply to 16.9 above is yes, whether procedure for registration as Share Transfer Agent has been initiated/ completed with SEBI?	□ Yes □ No □ Not Applicable	If no, details of discrepancies must be mentioned here	
16.11.	Whether all associated persons engaged in depository operations are NISM certified as per SEBI/NSDL guidelines?	□ Yes □ No	If no, details of discrepancies must be mentioned here	
16.12	<ul> <li>Whether RTA is complying with the following requirements w.r.t. Online Resolution of Disputes in the Indian Securities Market in accordance with NSDL Circular no. NSDL/CIR/II/31/2023 dated August 17, 2023:</li> <li>Implementation of ODR mechanism as required in aforesaid circular i.e. registration of RTA on the ODR Portal by September 15, 2023.</li> <li>Display a link to the ODR Portal on the home page of their websites and mobile apps.</li> </ul>	□ Yes □ No	If no, details of discrepancies must be mentioned here	
16.13	Whether any regulatory action has been taken against RTA by SEBI, RBI, stock exchanges, etc.?	□ Yes □ No	If Yes, then details regulatory action must be mentioned here	
16.14	Whether any other deviation/non- compliance observed by internal auditor which is not specifically covered above?	□ Yes □ No	If Yes, then details must be mentioned here	
16.15	Whether any instances of delay were observed in confirmation/ rejection of pending demat/remat requests which were not processed within the stipulated time frame where the delay is attributed to the listed Issuer?	□ Yes □ No	If no, details of discrepancies must be mentioned here	
16.16	Whether guidelines/information issued by SEBI/NSDL from time to time has been communicated to all the companies handled by the RTA/Issuer wherever applicable?	□ Yes □ No	If no, details of discrepancies must be mentioned here	
17	System Areas			
17.1	Whether adequate physical and logical access restrictions for usage of system are in place?	□ Yes □ No	If no, then number of cases with discrepancies must be mentioned here	
17.2	Whether scheme of variable access rights is implemented?	□ Yes □ No	If no, then details of the issue must be mentioned here	

17.3	Whether NSDL system is used only for the	$\Box$ Yes $\Box$ No	If no, then details	
	depository operations and no other software		of the issue must	
	or alteration of parameters / configuration		be mentioned	
	has been made?		here	

17.4	Whether Antivirus software in the client	□ Yes		If no than datails		
17.4		$\Box$ res		If no, then details of the issue must		
	machine is updated as per prescribed frequency?			be mentioned		
	inequency:			here		
17.5	Whether all the softwares installed on client	□ Yes		If no, then details		
17.5	machine are licensed?			of the issue must		
	machine are neensed:			be mentioned		
				here		
17.6	Whether documentation relating to	□ Yes	□ No	If no, then details		
17.0	procedure for internet and etoken has been	L 105		of the issue must		
	maintained?			be mentioned		
				here		
17.7	Whether hardware and operating system on	□ Yes	□ No	If no, then details		
	machines used for depository operations are			of the issue must		
	as per the specifications mentioned in the			be mentioned		
	latest Form B submitted to NSDL?			here		
17.8	Whether scheduled switch to fallback	□ Yes	$\square$ No	If no, then details		
	connectivity is done and the record thereof is			of the issue must		
	maintained?			be mentioned		
				here		
17.9	Whether all the hardware / equipments used	$\Box$ Yes	$\square$ No	If no, then details		
	for depository operations are covered under			of the issue must		
	AMC / warranty?			be mentioned		
				here		
17.10.	Whether backup of back office data is	$\Box$ Yes	□ No	If no, then details		
	taken?			of the issue must		
				be mentioned		
1 7 1 1				here		
17.11	Unique Document Identification Number			To be filled by		
	(UDIN)			Practicing		
				Chartered		
				Accountants/		
				Company Secretaries (if		
				applicable)		
	Important References (only illustrative,			applicatic)		
	not exhaustive) -					
1	NSDL Bye laws and Business Rules			1	1	
2	Compliance Manual					
2	Other circulars issued by NSDL and SEBI from time to time					
Management's Comment* - Mandatory if auditor's observation is negative.						
wranag	Management's Comment' - Mandatory II auditor's observation is negative.					