

Circular No.: NSDL/POLICY/2019/0017

March 27, 2019

Subject: Internal and Concurrent Audit for depository operations.

Participants are aware that as per Bye Law 10.3, each Participant is required to have its depository operations audited by a qualified Chartered Accountant or a Company Secretary or a Cost and Management Accountant holding a Certificate of Practice. Based on such audit, a copy of the report should be submitted to NSDL on half yearly basis.

Attention of Participants is invited to Circular No. NSDL/POLICY/2018/0042 dated August 3, 2018 in which guidelines related to scope of the audit and format of the audit report were provided. The audit report format has been modified and enclosed as **Annexure 1** in track change mode and as **Annexure 2** (without highlighting the changes). The broad objectives / guidelines for the internal / concurrent audit are enclosed as **Annexure 3**. Participants are advised to take note of the following:

1. Audit should cover all facets of the depository operations. Auditor may expand the scope of audit / add more audit points to achieve the objectives enclosed as Annexure 3. Participants are advised to extend full co-operation to their auditors to enable them to perform an effective audit. All circulars / guidelines issued by NSDL / SEBI from time to time and other information / records desired by the auditors should be made available to them within a reasonable time.
2. Participants should forward the audit report as per schedule given below to NSDL –

Audit Period	Due date for submission of report to NSDL
April 1 to September 30	November 15
October 1 to March 31	May 15

3. The Participants which remain operational for less than three months in an audit period can submit audit report for that audit period along with the audit report for next audit period. For example, if a Participant is made operational by NSDL on July 1, 2018, then it can submit first audit report for period July 1, 2018 – March 31, 2019.
4. Audit work for areas which are covered under the scope of concurrent audit should be completed by next working day. If audit cannot be completed by next working day due to large volume, it must be completed within a week. Concurrent audit includes following areas:

- i) Account opening,

- ii) Delivery Instruction Slip (DIS) book issuance,
- iii) Execution of DIS.
- iv) Power of Attorney modifications,
- v) Account closure requests initiated by Participant,
- vi) Investor grievances received by Participant,
- vii) Providing Transaction Statements to clearing members (process level)
- viii) KYC reconfirmation intimated by NSDL
- ix) Replacement of Original DIS image in tamper proof storage
- x) Non Disposal Undertakings (NDU)
- xi) Modification in the name of client (including minor correction in name)

Apart from the above, following audit area would also get included under scope of concurrent audit (100%) with effect from April 1, 2019:

- xii) Client data modifications
5. Participants may appoint same auditor for concurrent and internal audit. If both audits are done by same auditor, then a consolidated report must be submitted instead of two separate reports. If both audits are being done by different auditors, then two separate reports must be submitted.
 6. Participants are advised to note that the audit report format provided in this circular is applicable for audit period October 1, 2018 to March 31, 2019 and onwards.
 7. Participants are hereby informed that internal and/or concurrent audit reports which are not as per guidelines will be treated as non-submission of the report. NSDL reserves the right to advise a Participant to change its auditor if quality of the report is found to be not satisfactory or the audit is not carried out as per guidelines.
 8. The auditors may visit service centers (on sample basis) to check whether proper procedures are being followed at such centers.
 9. Any one person conducting the internal and/or concurrent audit (risk prone areas) should obtain certification from the National Institute of Securities Markets (NISM) by passing the NISM-Series-VI: Depository Operations Certification Examination (DOCE). Alternatively, such persons, if eligible, may undergo Continuing Professional Education (CPE) program for depository operations (details available on www.nism.ac.in).

10. Internal/concurrent audit report needs to be submitted in electronic form through e-PASS platform as mentioned in circular NSDL/POLICY/2016/0091 dated November 9, 2016.

For and on behalf of
National Securities Depository Limited

Chirag Shah
Senior Manager

Enclosed: Three

FORTHCOMING COMPLIANCE			
Particulars	Deadline	Manner of sending	Reference
Investor Grievance Report (Monthly)	By 10 th of the following month.	Through e-PASS	Circular No. NSDL/POLICY/2015/0096 dated October 29, 2015
Artificial Intelligence /Machine Learning Reporting Form (if offering or using such technologies as defined)	By 15 th of the following month.	By email at Participant-Interface@nsdl.co.in	Circular No. NSDL/POLICY/2019/0016 dated March 27, 2019
Charge Structure	April 30 th every year.	By email at dpfees@nsdl.co.in	1. Circular No. NSDL/POLICY/2006/0064 dated December 26, 2006. 2. Circular No. NSDL/POLICY/2007/0003 dated January 8, 2007.