Annexure A

Procedure for submission of Annual System Audit Report through e-PASS

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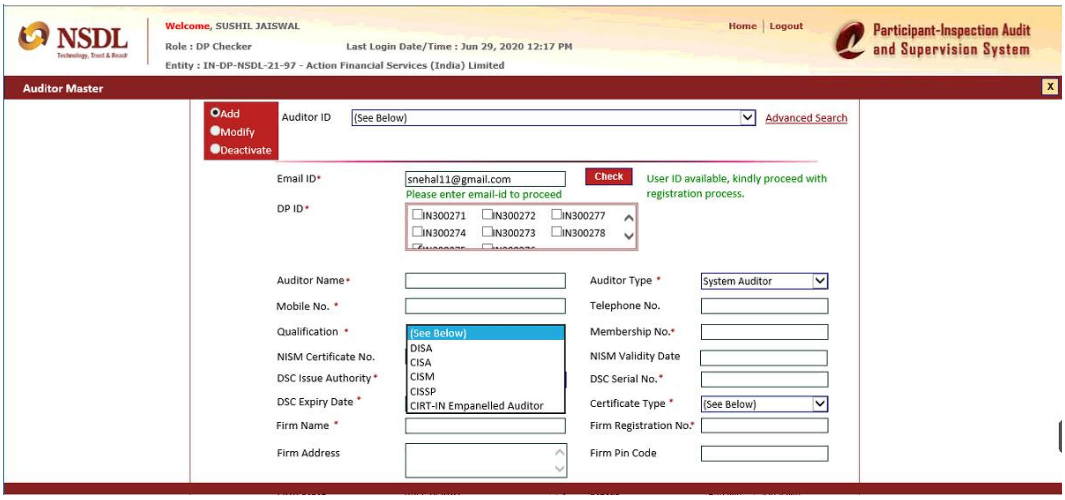
A. Procedure for submission of Annual System Audit Report through e-PASS:

1) System Auditor Login :

After login on e-PASS with Participant’s login credentials, Participant will be able to add new user for System auditor under head of ‘Masters’ -> ‘Auditor Master’ [*as exhibited below*].This will display auditor master screen, where Participants can add System auditor user IDs. Participant will need to select Auditor type as “System Auditor” and fill the other details *as exhibited below*.


NSDL
Technology, Trust & Reach
Home | Logout
Participant-Inspection Audit and Supervision System
Auditor Master
X
Advanced Search
Check

Welcome, SUSHIL JAISWAL
Role : DP Checker
Last Login Date/Time : Jun 29, 2020 12:17 PM
Entity : IN-DP-NSDL-21-97 - Action Financial Services (India) Limited

● Add
○ Modify
○ Deactivate

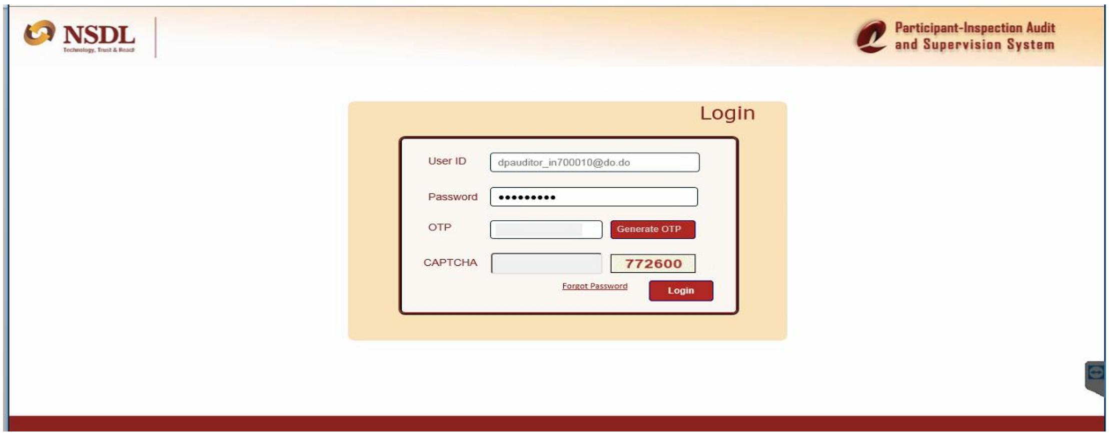
Auditor ID: (See Below)

Email ID*: snehal11@gmail.com
Please enter email-id to proceed
User ID available, kindly proceed with registration process.

DP ID*: □ IN300271 □ IN300272 □ IN300277 □ IN300274 □ IN300273 □ IN300278

Auditor Name*:
Auditor Type*: System Auditor
Mobile No.*:
Telephone No.:
Qualification*: (See Below) / DISA / CISA / CISM / CISSP / CIRT-IN Empanelled Auditor
Membership No.*:
NISM Certificate No.:
NISM Validity Date:
DSC Issue Authority*:
DSC Serial No.*:
DSC Expiry Date*:
Certificate Type*: (See Below)
Firm Name*:
Firm Registration No.*:
Firm Address:
Firm Pin Code:

a) System Auditor shall login to e-PASS portal (https://www.epass.nsdl.com/epass/) using their credential as created by Participant. “User ID” will be the email ID of auditor as provided by System auditor to Participant. After entering user ID and password, Click on “Generate OTP‟ as exhibited below:


NSDL
Technology, Trust & Reach
Participant-Inspection Audit and Supervision System
Login
Generate OTP
Forgot Password
Login

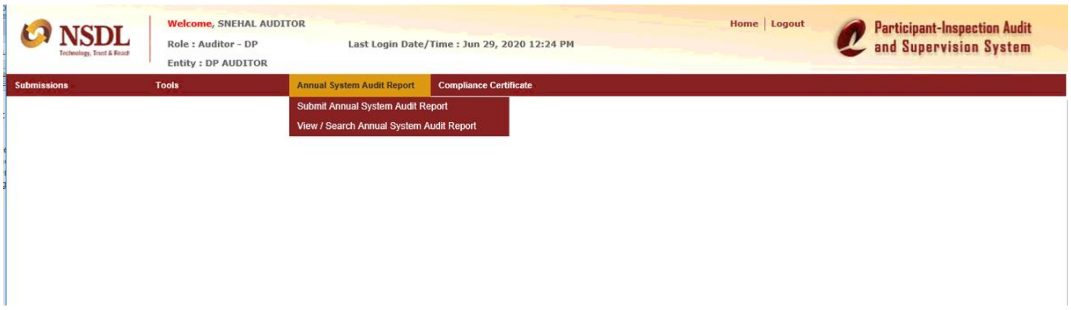
User ID: dpauditor_in700010@do.do
Password: ●●●●●●●●●●
OTP:
CAPTCHA: 772600

b) Upon clicking on “Generate OTP‟, a One Time Password (OTP) will be sent on registered mobile number and email ID of System Auditor and same has to be entered for login to e-PASS. On first login with default password “Nsdl@123” and OTP, e-PASS portal will prompt the user to change password. Upon successfully changing the password, System Auditor needs to re-login with new password to get access to e-PASS.

c) Forgot Password:
In case System Auditor forgets password, a link – “Forgot Password‟ is provided on login screen of e-PASS portal through which a new password can be generated. Upon clicking the link “Forgot Password‟ (as exhibited below), users login password will be reset and an email intimation will be sent on the registered email id (e-mail ID provided at the time of registration) with the new password. On receipt of this email, user can login to e-PASS using this new password. After login, the user can change the password by using the Change Password functionality provided under “Tools” in the main menu.

2) Submission of Annual System Audit Report by System Auditor:

a) After login to e-PASS, for submission of Annual System Audit Report, click on ‘Annual System Audit Report’. Then click on “Submit Annual System Audit Report”.

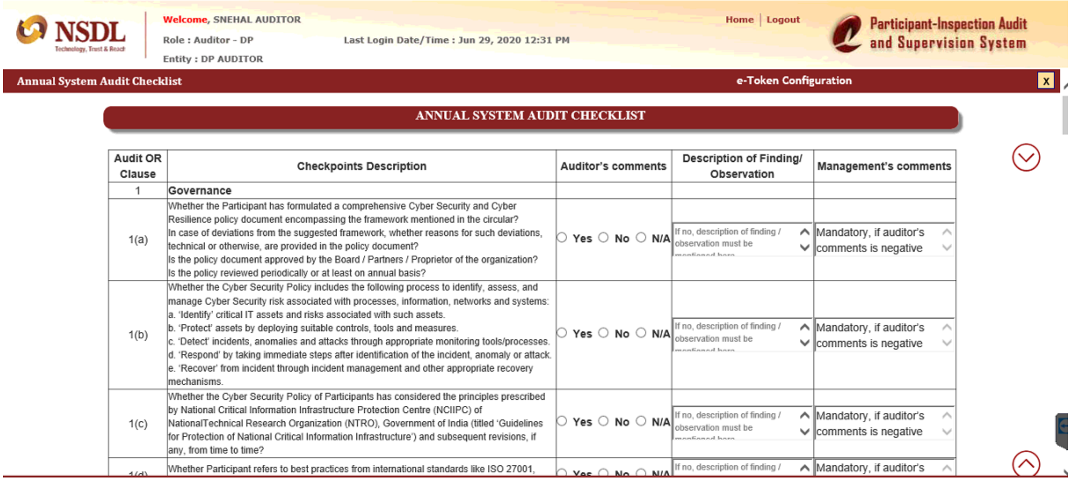


Welcome, SNEHAL AUDITOR
Role : Auditor - DP
Entity : DP AUDITOR
Last Login Date/Time : Jun 29, 2020 12:24 PM

NSDL
Technology, Trust & Reach
Home | Logout
Participant-Inspection Audit and Supervision System
Submissions
Tools
Annual System Audit Report
Compliance Certificate
Submit Annual System Audit Report
View / Search Annual System Audit Report

b) Upon Clicking ‘Submit Annual System Audit Report’ screen as exhibited below will be displayed. Auditor has to select audit period, and DP ID and click on submit button.

c) Once the Submit button is clicked, the Annual System Audit checklist will be displayed on the screen as exhibited below, which has to be filled completely by the System auditor.



Welcome, SNEHAL AUDITOR
Role : Auditor - DP
Entity : DP AUDITOR
Last Login Date/Time : Jun 29, 2020 12:31 PM

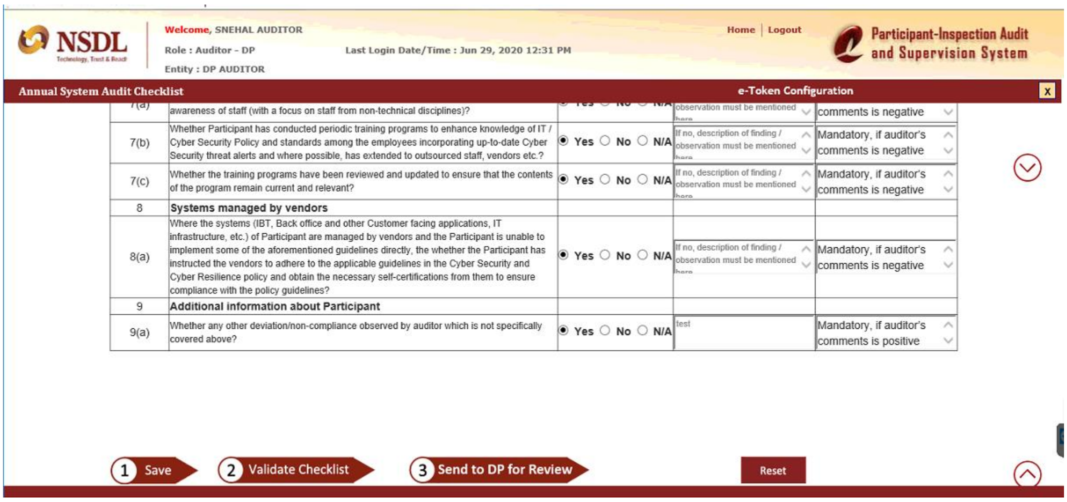
Annual System Audit Checklist

ANNUAL SYSTEM AUDIT CHECKLIST

Audit OR Clause	Checkpoints Description	Auditor's comments	Description of Finding/ Observation	Management's comments
1	**Governance**			
1(a)	Whether the Participant has formulated a comprehensive Cyber Security and Cyber Resilience policy document encompassing the framework mentioned in the circular? In case of deviations from the suggested framework, whether reasons for such deviations, technical or otherwise, are provided in the policy document? Is the policy document approved by the Board / Partners / Proprietor of the organization? Is the policy reviewed periodically or at least on annual basis?	○ Yes ○ No ○ N/A	If no, description of finding / observation must be	Mandatory, if auditor's comments is negative
1(b)	Whether the Cyber Security Policy includes the following process to identify, assess, and manage Cyber Security risk associated with processes, information, networks and systems: a. 'Identify' critical IT assets and risks associated with such assets. b. 'Protect' assets by deploying suitable controls, tools and measures. c. 'Detect' incidents, anomalies and attacks through appropriate monitoring tools/processes. d. 'Respond' by taking immediate steps after identification of the incident, anomaly or attack. e. 'Recover' from incident through incident management and other appropriate recovery mechanisms.	○ Yes ○ No ○ N/A	If no, description of finding / observation must be	Mandatory, if auditor's comments is negative
1(c)	Whether the Cyber Security Policy of Participants has considered the principles prescribed by National Critical Information Infrastructure Protection Centre (NCIIPC) of NationalTechnical Research Organization (NTRO), Government of India (titled 'Guidelines for Protection of National Critical Information Infrastructure') and subsequent revisions, if any, from time to time?	○ Yes ○ No ○ N/A	If no, description of finding / observation must be	Mandatory, if auditor's comments is negative
1(d)	Whether Participant refers to best practices from international standards like ISO 27001,	○ Yes ○ No ○ N/A	If no, description of finding /	Mandatory, if auditor's

d) The System auditor can enter his comments and mention observations as mentioned in above exhibit.

e) System Auditor can click "Save Draft" button to save the draft report at any point in time while filling the report. The System Auditor can view the saved Audit report under 'view/search Annual System Audit Report' option. The System Auditor can complete the checklist at a future date [*as exhibited below*].



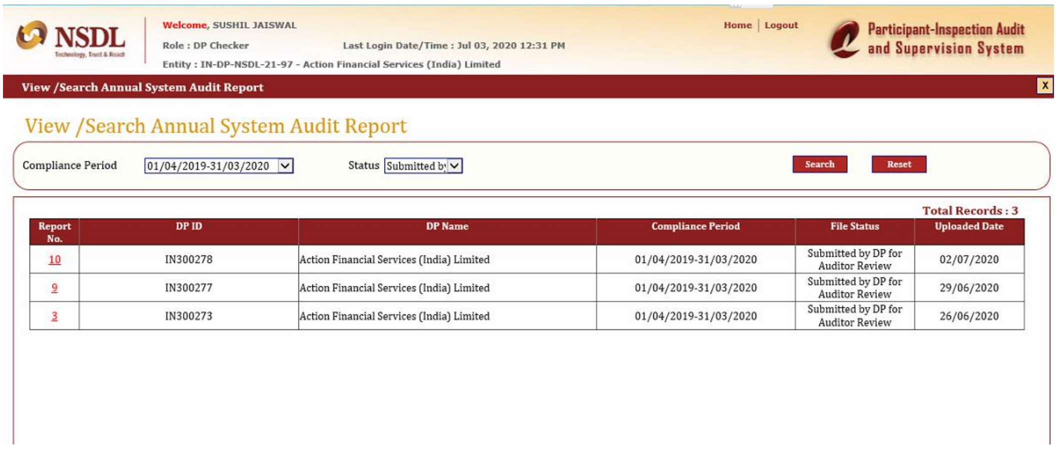
Welcome, SNEHAL AUDITOR
Role : Auditor - DP
Entity : DP AUDITOR
Last Login Date/Time : Jun 29, 2020 12:31 PM

Annual System Audit Checklist

7(a)	awareness of staff (with a focus on staff from non-technical disciplines)?	Yes ○ No ○ N/A	observation must be mentioned	comments is negative
7(b)	Whether Participant has conducted periodic training programs to enhance knowledge of IT / Cyber Security Policy and standards among the employees incorporating up-to-date Cyber Security threat alerts and where possible, has extended to outsourced staff, vendors etc.?	● Yes ○ No ○ N/A	If no, description of finding / observation must be mentioned	Mandatory, if auditor's comments is negative
7(c)	Whether the training programs have been reviewed and updated to ensure that the contents of the program remain current and relevant?	● Yes ○ No ○ N/A	If no, description of finding / observation must be mentioned	Mandatory, if auditor's comments is negative
8	**Systems managed by vendors**			
8(a)	Where the systems (IBT, Back office and other Customer facing applications, IT infrastructure, etc.) of Participant are managed by vendors and the Participant is unable to implement some of the aforementioned guidelines directly, the whether the Participant has instructed the vendors to adhere to the applicable guidelines in the Cyber Security and Cyber Resilience policy and obtain the necessary self-certifications from them to ensure compliance with the policy guidelines?	● Yes ○ No ○ N/A	If no, description of finding / observation must be mentioned	Mandatory, if auditor's comments is negative
9	**Additional information about Participant**			
9(a)	Whether any other deviation/non-compliance observed by auditor which is not specifically covered above?	● Yes ○ No ○ N/A	test	Mandatory, if auditor's comments is positive

f) Once the system audit checklist is filled completely, the System Auditor will need to click on 'validate checklist' button. If there are any error/s, the same would be highlighted which are required to be corrected by the System Auditor and once again click on button 'validate checklist'. Once audit checklist is validated successfully, then System Auditor can send the report to Participant for review and its comments (if any) by clicking on "Send to DP for Review" button [*as exhibited above*].

g) The process of review by the Participant is provided in point no. 3 below. Once the report is submitted by the Participant for review by auditor, auditor will be able to see the Annual System Audit Report under the head of 'Annual System Audit Report -> 'view/search System Audit Report' [*as exhibited below*] with status 'Submitted by DP for Auditor Review'.



NSDL
Technology, Trust & Reach
Home | Logout
Participant-Inspection Audit and Supervision System
X
Search
Reset

Welcome, SUSHIL JAISWAL

Role : DP Checker

Last Login Date/Time : Jul 03, 2020 12:31 PM

Entity : IN-DP-NSDL-21-97 - Action Financial Services (India) Limited

View /Search Annual System Audit Report

View /Search Annual System Audit Report

Compliance Period 01/04/2019-31/03/2020

Status Submitted by

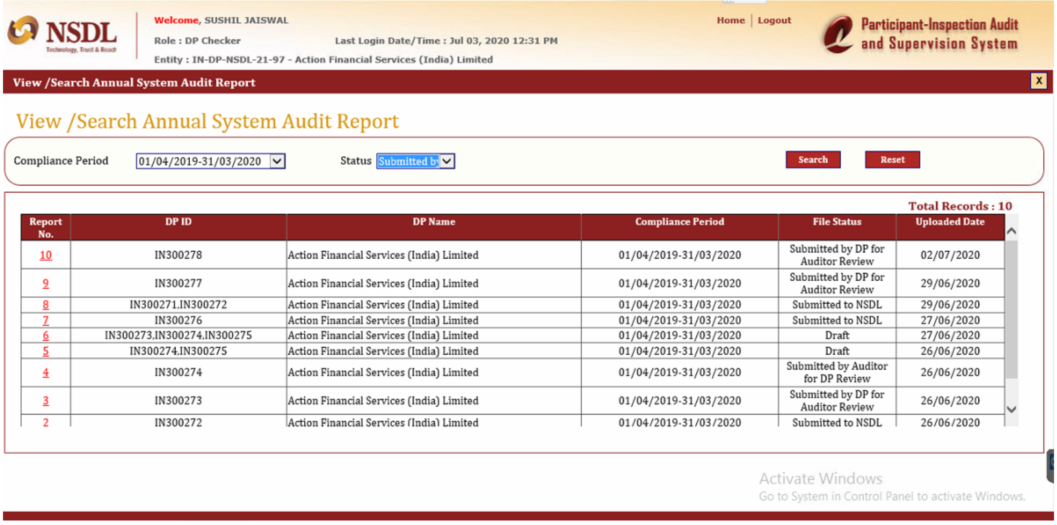
Total Records : 3

Report No.	DP ID	DP Name	Compliance Period	File Status	Uploaded Date
10	IN300278	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted by DP for Auditor Review	02/07/2020
9	IN300277	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted by DP for Auditor Review	29/06/2020
3	IN300273	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted by DP for Auditor Review	26/06/2020

h) If the System auditor is not satisfied with the comments/review of the Participant, the System auditor may resend the report to Participant again for review. The changes, if any, made by the System auditor in report resent to Participant for review will be highlighted in the report.

i) If the System auditor is satisfied with the comments & review made by the Participant, then auditor will need to click on 'Save' and 'validate checklist' button. If there are any error/s the same would be highlighted which are required to be corrected by the System Auditor and once again click on button 'validate checklist'. Once audit checklist is validated successfully then the report has to be signed digitally by the System auditor by using the relevant digital signature certificate (DSC) registered in e-PASS at the time of addition of the System auditor by the Participant.

j) The System Auditor and Participant will be able to see the Annual System Audit Report with relevant status of the Annual System Audit Report under the head of Annual System Audit Report -> 'view/search Annual System Audit Report'. The relevant screen shot is exhibited below.



NSDL
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Home | Logout
Participant-Inspection Audit and Supervision System
X
Search
Reset
Activate Windows
Go to System in Control Panel to activate Windows.

Welcome, SUSHIL JAISWAL

Role : DP Checker

Last Login Date/Time : Jul 03, 2020 12:31 PM

Entity : IN-DP-NSDL-21-97 - Action Financial Services (India) Limited

View /Search Annual System Audit Report

View /Search Annual System Audit Report

Compliance Period 01/04/2019-31/03/2020

Status Submitted by

Total Records : 10

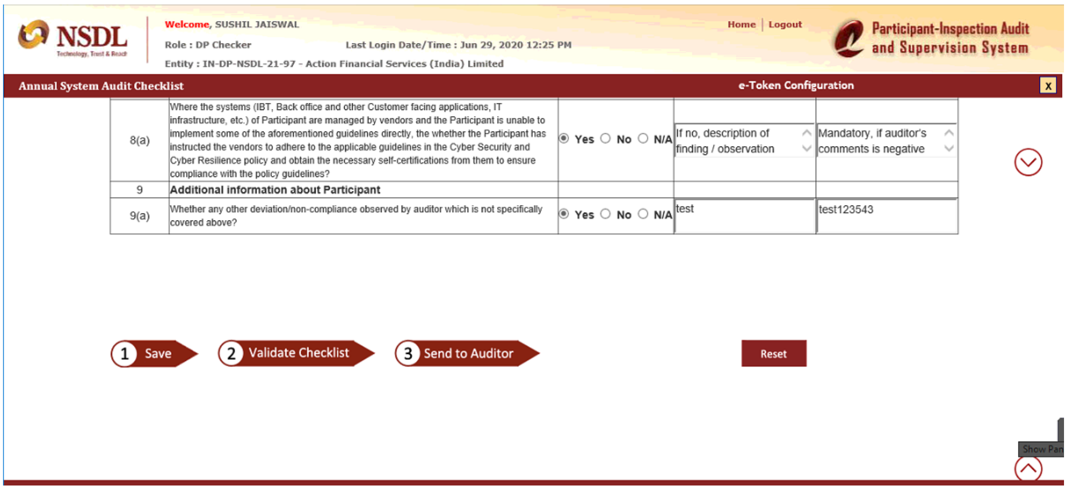
Report No.	DP ID	DP Name	Compliance Period	File Status	Uploaded Date
10	IN300278	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted by DP for Auditor Review	02/07/2020
9	IN300277	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted by DP for Auditor Review	29/06/2020
8	IN300271,IN300272	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted to NSDL	29/06/2020
7	IN300276	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted to NSDL	27/06/2020
6	IN300273,IN300274,IN300275	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Draft	27/06/2020
5	IN300274,IN300275	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Draft	26/06/2020
4	IN300274	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted by Auditor for DP Review	26/06/2020
3	IN300273	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted by DP for Auditor Review	26/06/2020
2	IN300272	Action Financial Services (India) Limited	01/04/2019-31/03/2020	Submitted to NSDL	26/06/2020

3) Review by Participant:

a) Once the report has been sent by the System Auditor to its Participant for review, the Participant can login into e-PASS using login credential. Participant can view the Annual System Audit report under the head of 'Annual System Audit Report ->'View/Search Annual System Auditor Report'.

b) A list of Annual System Audit Report submitted by System auditor will be displayed to the Participant. Participant will be able to review and add its comments (if any) on the Annual System Audit Report where status of the report is 'Submitted by Auditor for DP review'.

c) Participant is required to review the Annual System Audit Report and add remarks and comments (if any) wherever required. Once, Participant has completed its review and entered its comments, wherever required, it will be required to validate the audit checklist by clicking on 'Validate Checklist' button. If there are any error/s the same would be highlighted which are required to be corrected by the Participant and once again click on button 'validate checklist'. Once audit checklist is validated successfully then Participant has to click on button 'Send to Auditor' pursuant to which the report will be sent to auditor for review.



NSDL
Technology, Trust & Reach
Home | Logout
Participant-Inspection Audit and Supervision System

Welcome, SUSHIL JAISWAL

Role : DP Checker

Last Login Date/Time : Jun 29, 2020 12:25 PM

Entity : IN-DP-NSDL-21-97 - Action Financial Services (India) Limited

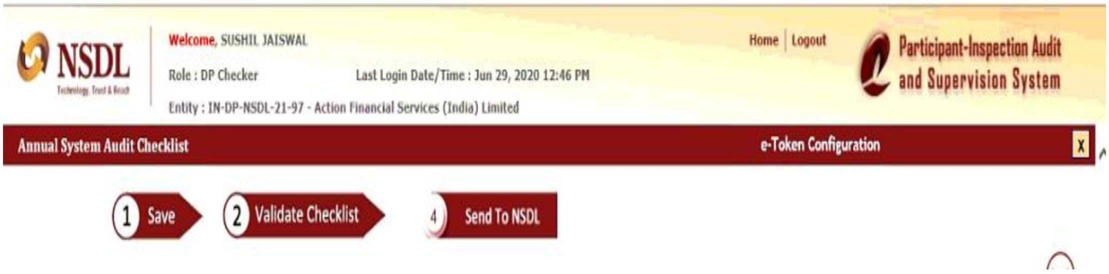
Annual System Audit Checklist

e-Token Configuration

8(a)	Where the systems (IBT, Back office and other Customer facing applications, IT infrastructure, etc.) of Participant are managed by vendors and the Participant is unable to implement some of the aforementioned guidelines directly, the whether the Participant has instructed the vendors to adhere to the applicable guidelines in the Cyber Security and Cyber Resilience policy and obtain the necessary self-certifications from them to ensure compliance with the policy guidelines?	● Yes ○ No ○ N/A	If no, description of finding / observation	Mandatory, if auditor's comments is negative
9	**Additional information about Participant**			
9(a)	Whether any other deviation/non-compliance observed by auditor which is not specifically covered above?	● Yes ○ No ○ N/A	test	test123543

d) After the report is sent to the auditor for review, the auditor can review the comments/ remarks given by Participant's management. If the auditor is satisfied with the comments, it will sign the report using its DSC and submit the same to Participant by following the procedure as stated at 2(i) above.

e) Annual System Audit Report submitted by auditor after attaching its DSC can be viewed by the Participant under the head 'Annual System Audit Report' -> 'view/search Annual System Audit Report'. The Participant is required to digitally sign the report using its DSC before submitting to NSDL. After digitally signing the report, the same is required to be submitted to NSDL by clicking on "Send to NSDL" Button as exhibited below.



NSDL
Technology, Trust & Reach
Home | Logout
Participant-Inspection Audit and Supervision System

Welcome, SUSHIL JAISWAL

Role : DP Checker

Last Login Date/Time : Jun 29, 2020 12:46 PM

Entity : IN-DP-NSDL-21-97 - Action Financial Services (India) Limited

Annual System Audit Checklist

e-Token Configuration

1 Save
2 Validate Checklist
4 Send To NSDL