

# CIRCULAR

|              |                                                                                       |               |          |
|--------------|---------------------------------------------------------------------------------------|---------------|----------|
| Circular No. | 20251014-2                                                                            | Circular Date | 20251014 |
| Category     | Regulatory and Compliance                                                             | Segment       | ALL      |
| Subject      | Submission of Half Yearly System Audit Report for the period ended September 30, 2025 |               |          |
| Attachments  | • <a href="#">Annexures</a>                                                           |               |          |

**Circular Ref. No. 20251014-1**

**October 14, 2025**

**Subject – Submission of Half Yearly System Audit Report for the period ended September 30, 2025**

Members' attention is drawn to SEBI circular no. CIR/MRD/DMS/34/2013 dated November 6, 2013, on the Annual System Audit of Broker Dealers.

Accordingly, members are required to carry out system audit of their trading facility for the period ended September 30, 2025, as per the applicability criteria given below:

| Sr No. | Particulars                                                            | Broker Type | Terms of Reference (ToR) | Presence of broker                                                                   | Periodicity of submission of report |
|--------|------------------------------------------------------------------------|-------------|--------------------------|--------------------------------------------------------------------------------------|-------------------------------------|
| 1      | IML / IBT / DMA / STWT / SOR users and who may also be Type I brokers. | II          | TOR II                   | Presence in not more than 10 locations and number of terminals are not more than 50. | Once in two years                   |
|        |                                                                        |             |                          | Presence in more than 10 locations or number of terminals are more than 50.          | Annually                            |
| 2      | Algo users and who may also be Type II brokers                         | III         | TOR III                  | Not Applicable                                                                       | Half yearly                         |

Members who are using trading software as provided by the Exchange (BOLTPLUS ON WEB) and/or software provided by Exchange owned Application Service Provider (ASP) shall not be covered in the system audit.

Timelines for submission of System Audit Report is as given below:

| S. No. | Particulars              | Due Date for submission to the Exchange |
|--------|--------------------------|-----------------------------------------|
| 1.     | System Audit Report      | November 30, 2025                       |
| 2.     | Corrective Action Report | February 28, 2026                       |
| 3.     | Follow on Report         | March 31, 2026                          |

Exchange has identified the broker type and periodicity regarding submission of the system audit report based on available data / information and displayed the same in the IIEFS.

Members may note that the above-mentioned reports are required to be submitted only in electronic form through IIEFS (INDIA INX Electronic Filing System). Once IIEFS is activated for submission, submission of System Audit Report shall be considered complete only after Member submits the report to the Exchange and receives an acknowledgment email. Saved reports/reports submitted by auditor will not be considered as final submission.

Kindly note that in case of non/late submission of reports for period ended September 30, 2025, beyond November 30, 2025, disciplinary action/charges will be levied as follows:

- A. A charge of USD 2/- per day will be levied from the month of December 2025.
- B. Non-Submission within 3 months from the end of due date for submission; the Exchange will withdraw ETI facility for non-submission of systems audit report.

In case of any further clarification, Members may contact on the following:

| Name of Department | Tel No.           | Email                                                                              |
|--------------------|-------------------|------------------------------------------------------------------------------------|
| Membership         | 079-61993135/3130 | <a href="mailto:inxmembership.ops@indiainx.com">inxmembership.ops@indiainx.com</a> |

**For and on behalf of,  
India International Exchange (IFSC) Ltd.**

**Jay Soni  
Manager - Regulatory**