

Circular

DEPARTMENT: INSPECTION

Download Ref No: NSE/INSP/58471

Date: September 20, 2023

Circular Ref. No: 78/2023

To All Members,

Sub: Submission of VAPT report and/or Action taken report (ATR)/Compliance Report

This is with reference to Exchange Circulars NSE/INSP/53387 dated August 23, 2022, NSE/INSP/54708 dated December 2, 2022; NSE/INSP/56097 dated March 22, 2023, and NSE/INSP/56927 dated June 01, 2023, regarding Submission of VAPT report and /or VAPT compliance report through member portal by all members.

Trading Members are required to conduct and complete the VAPT during the period September to November for FY 2023-24 and the final report shall be submitted through member portal to the Stock Exchanges within one month from the date of completion of VAPT after approval from Technology Committee of respective members.

The detailed VAPT report along with summary report (as per format specified in **Annexure A**) as a single document shall be digitally signed by CERT-In empaneled entity to be submitted to Exchange by **December 31, 2023**. The guidelines for submitting the VAPT Report is given in **Annexure-B**.

Further, as per para 44 of SEBI Circular No. SEBI/HO/MIRSD/CIR/PB/2018/147 dated December 03, 2018 amended vide SEBI Circular No. SEBI/HO/MIRSD/TPD/P/CIR/2022/80 dated June 07, 2022, 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. For any open vulnerabilities as reported & submitted in VAPT report, members are required to submit Compliance Report in the format attached as **Annexure – C** digitally signed by the CERT-In empaneled entity as appointed by the member.

Accordingly, members are required to submit VAPT Compliance Report/ Action Taken Report (ATR) for FY 2023-24, as per format specified in **Annexure C** by **March 31, 2024**, on member portal. The guidelines for submitting the VAPT Compliance Report/Action Taken Report (ATR) is given in **Annexure D**

In order 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 provided in **Annexure-E**.

All Members are advised to take note of the contents of this Circular and comply.

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

**Ashwini Kadam
Senior Manager - Inspection**

Enclosure:

Annexure A - Format for VAPT Summary Report

Annexure B - Guidelines for submitting VAPT Report on Portal

Annexure C - Format for VAPT Compliance/ATR

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

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

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

Regional Office	E MAIL ID	CONTACT NO.
Ahmedabad (ARO)	inspectionahm@nse.co.in	079-49008632
Chennai (CRO)	inspection_cro@nse.co.in	044- 66309915/17
Delhi (DRO)	delhi_inspection@nse.co.in	011-23459127 / 38 / 46
Kolkata (KRO)	inspection_kolkata@nse.co.in	033-40400412 / 59
Mumbai (WRO)	compliance_wro@nse.co.in	022-26598200/022-61928200
Central Help Desk	compliance_assistance@nse.co.in	

Annexure – A
Format for VAPT Summary Report

VAPT Report Summary				
Name of Trading Member				
Contact person Details (Name, Mobile number & EmailID) of Trading Member (Preferably CISO's)				
VAPT Completion Date “(DD-MM-YYYY)”				
Date of approval of VAPT report by Technology Committee of Trading Member “(DD-MM-YYYY)”				
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 (DD-MM-YYYY)				
Risk	Critical	High	Medium	Low
(A) No of closed vulnerabilities				
(B) No of open vulnerabilities				
Reason for non-closure: Mention for Critical, High, Medium, and Low separately				
Vulnerabilities planned to be closed by (DD/MM/YYYY) *				
Remarks				
<p>*Note - As per SEBI Circular dated June 07, 2022, any gaps/vulnerabilities detected shall be remedied on an immediate basis. Further, compliance of closure of findings identified during VAPT shall be submitted within 3 months post submission of VAPTreport. The planned target date should be mentioned accordingly.</p>				

Annexure – B

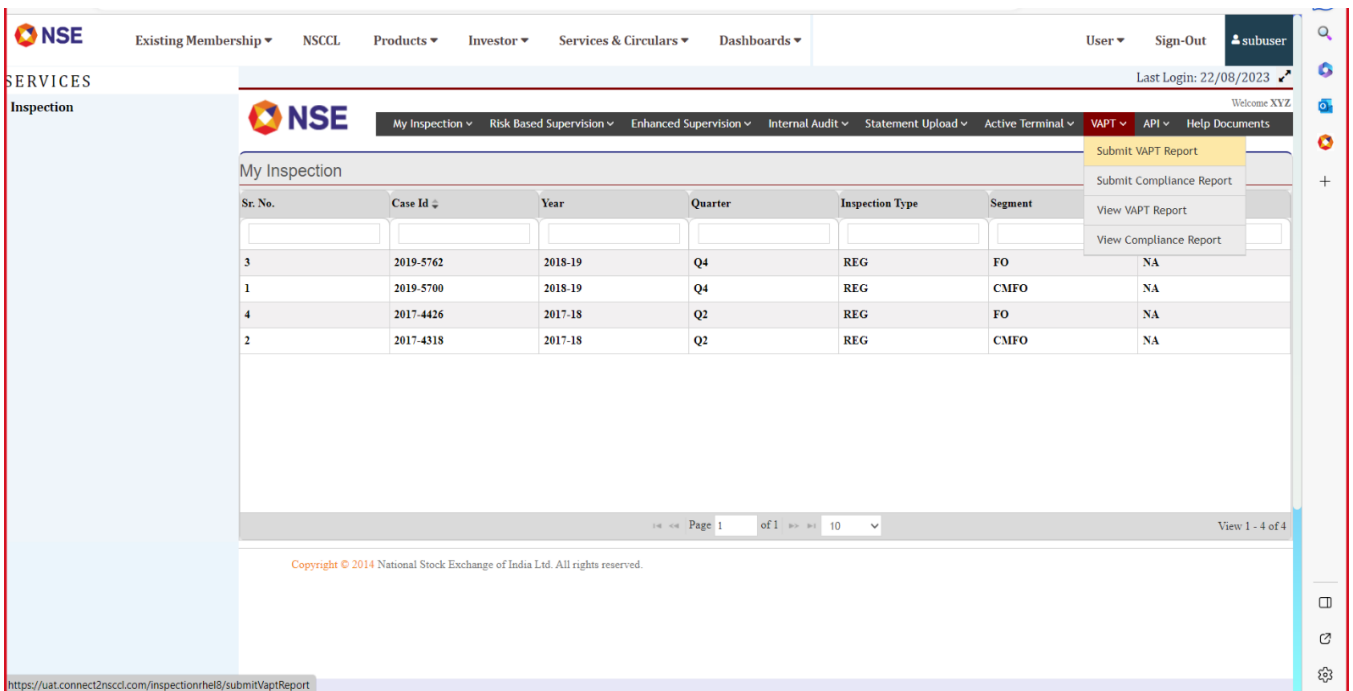
Guidelines for submitting VAPT Report on Portal

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 VAPT report**.



The screenshot displays the NSE Members Portal interface. The top navigation bar includes 'Existing Membership', 'NSCCL', 'Products', 'Investor', 'Services & Circulars', and 'Dashboards'. The user is logged in as 'subuser' with a last login of '22/08/2023'. The 'Inspection' tab is active, showing a table of inspections and a dropdown menu for 'VAPT' with options: 'Submit VAPT Report', 'Submit Compliance Report', 'View VAPT Report', and 'View Compliance Report'.

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.connect2nsccl.com/inspectionhel8/submitVaptReport

Step – 3

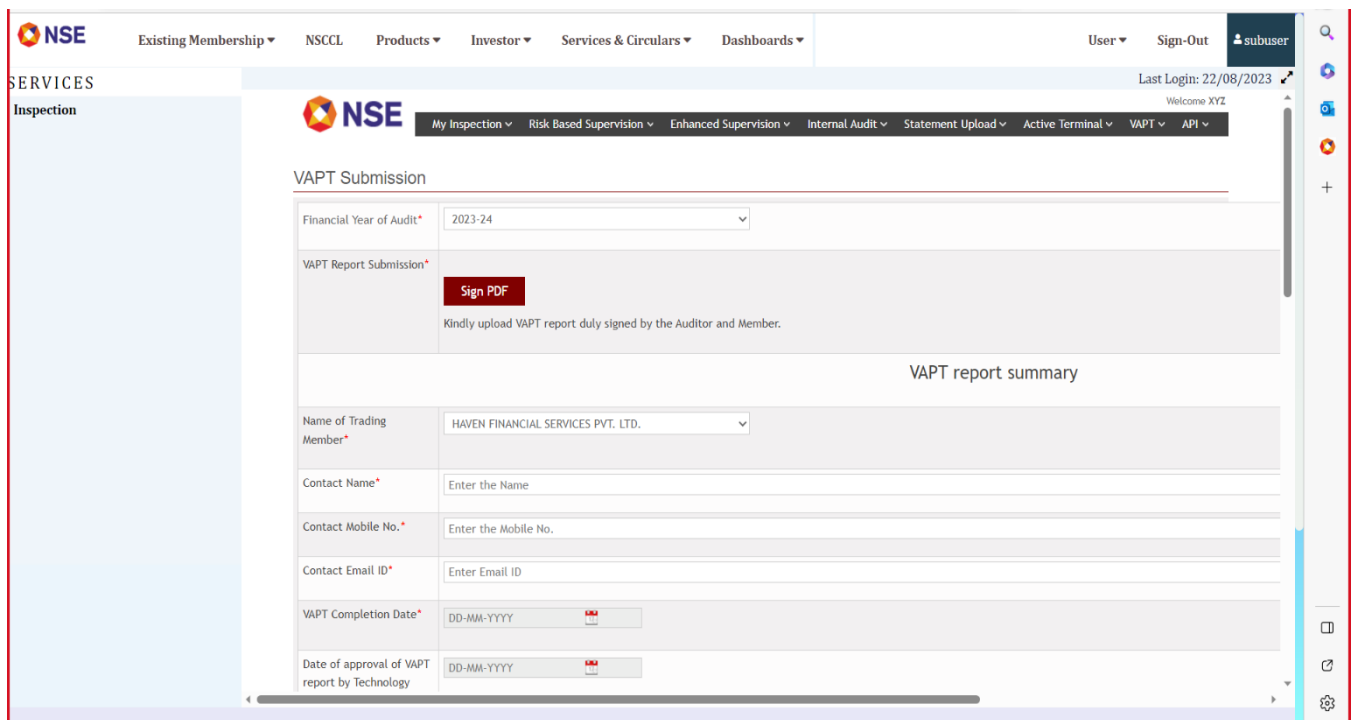
By clicking “**Submit VAPT report**”, the screen below will be displayed.

“VAPT Report Submission” –

Detailed VAPT report along with VAPT summary (as attached at **Annexure – A**) should be prepared and duly signed by the CERT- In empaneled entity who has conducted the VAPT.

The report shall be in PDF format and the file should not be more than 10 MB in size. (Before E-sign)

By clicking “**Sign PDF**” button, member shall be required to select VAPT report. (pdf format digitally signed by CERT-In empaneled entity)



The screenshot displays the NSE VAPT Submission web interface. The page features a top navigation bar with the NSE logo and menu items: Existing Membership, NSCL, Products, Investor, Services & Circulars, and Dashboards. On the right, there are links for User, Sign-Out, and a subuser profile. A sidebar on the left shows 'SERVICES' and 'Inspection'. The main content area is titled 'VAPT Submission' and includes a form with the following fields:

- Financial Year of Audit*: 2023-24
- VAPT Report Submission*: A red 'Sign PDF' button with the instruction 'Kindly upload VAPT report duly signed by the Auditor and Member.'
- VAPT report summary
- Name of Trading Member*: HAVEN FINANCIAL SERVICES PVT. LTD.
- Contact Name*: Enter the Name
- Contact Mobile No.*: Enter the Mobile No.
- Contact Email ID*: Enter Email ID
- VAPT Completion Date*: DD-MM-YYYY
- Date of approval of VAPT report by Technology: DD-MM-YYYY

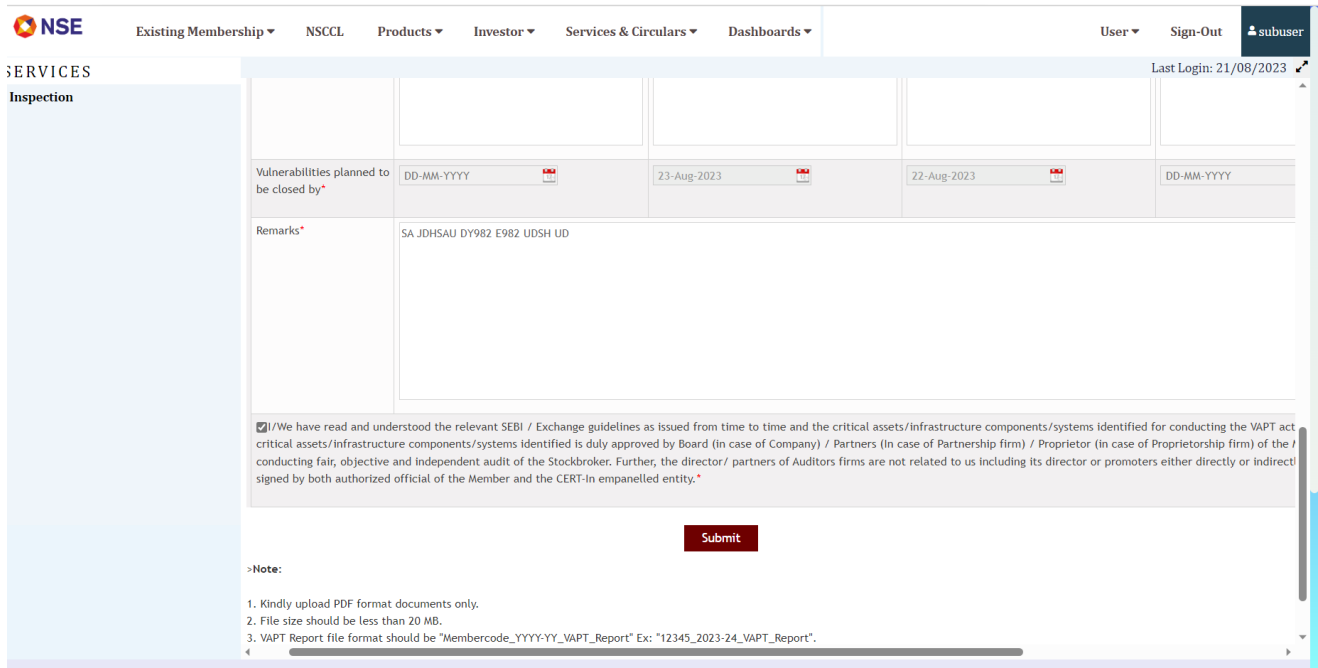
Step – 4

After uploading the VAPT report, Member shall be required to enter the VAPT report summary details as displayed below: -

Inspection	VAPT Completion Date*	22-Aug-2023		
	Date of approval of VAPT report by Technology Committee of Trading Member*	30-Aug-2023		
	Particular	Name	Contact No	Email ID
	Auditor's Detail*	Enter the Auditor Name	Enter the Auditor Mobile No.	Enter the Auditor Email ID
	Audit firm Detail*	Enter the Auditor Firm Name	Enter the Audit Firm Landline No.	Enter the Audit Firm Email ID
	CERT-In empanelment validity expiry Date*	DD-MM-YYYY		
		Critical	High	Medium
	(A) No of closed vulnerabilities*			
	(B) No of open vulnerabilities*			
	Reason for non-closure*	Mention for Critical	Mention for High	Mention for Medium

Step – 5

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



Existing Membership ▾ NSCL Products ▾ Investor ▾ Services & Circulars ▾ Dashboards ▾ User ▾ Sign-Out subuser

SERVICES Last Login: 21/08/2023

Inspection

Vulnerabilities planned to be closed by*	DD-MM-YYYY	23-Aug-2023	22-Aug-2023	DD-MM-YYYY
Remarks*	SA JDHSAU DY982 E982 UDSH UD			

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 act 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 / conducting fair, objective and independent audit of the Stockbroker. Further, the director/ partners of Auditors firms are not related to us including its director or promoters either directly or indirect signed by both authorized official of the Member and the CERT-in empanelled entity.*

Submit

>Note:

- Kindly upload PDF format documents only.
- File size should be less than 20 MB.
- VAPT Report file format should be "Membercode_YYYY-YY_VAPT_Report" Ex: "12345_2023-24_VAPT_Report".

Notes

- Submitted reports would be available under “**View Submitted Report**” sub-tab.
- In case a user is unable to submit the VAPT report due to any technical issue, kindly try submitting the VAPT 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

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 reports 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 – D

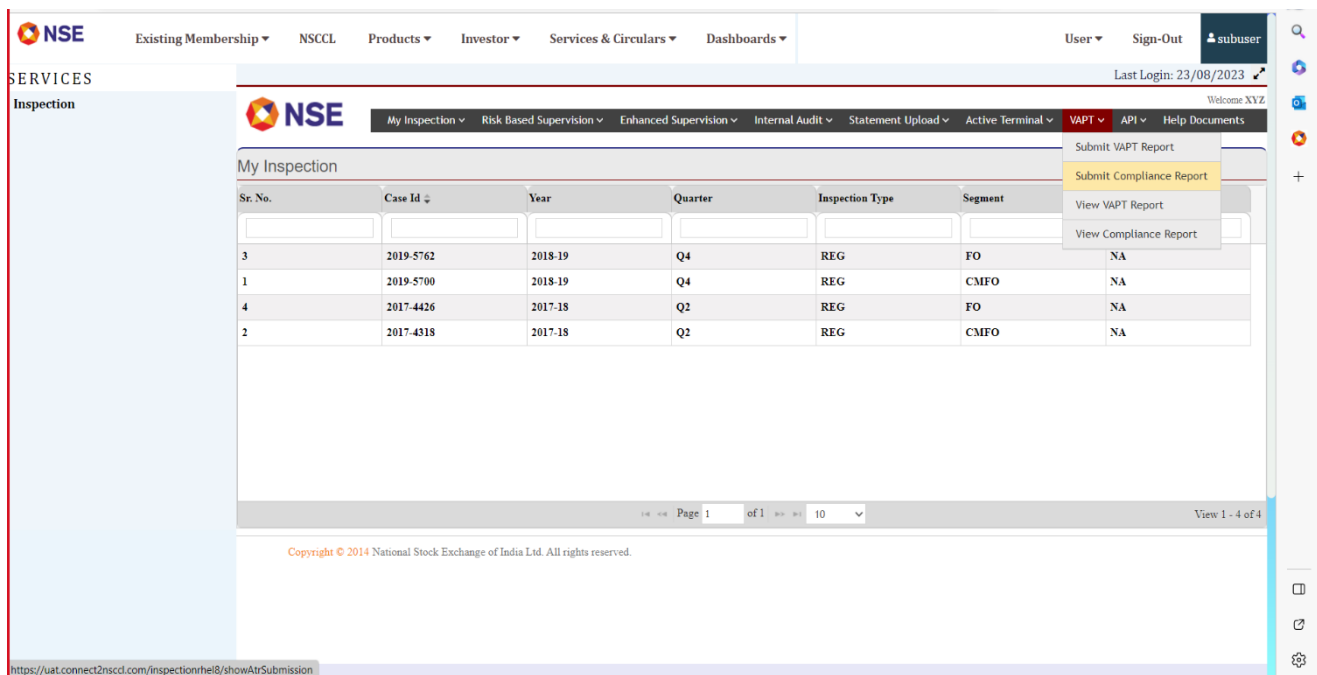
Guidelines for submitting the VAPT Compliance Report/Action Taken Report on Portal.

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 shows the NSE Members Portal interface. The top navigation bar includes 'Existing Membership', 'NSCCL', '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, displaying a table titled 'My Inspection' with columns for Sr. No., Case Id, Year, Quarter, Inspection Type, and Segment. A dropdown menu for 'VAPT' is open, showing options: 'Submit VAPT Report', 'Submit Compliance Report' (highlighted), 'View VAPT Report', and 'View Compliance Report'. The table contains the following data:

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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URL: https://uat.connect2nscd.com/inspection/hel8/showAtrSubmission

Step – 3

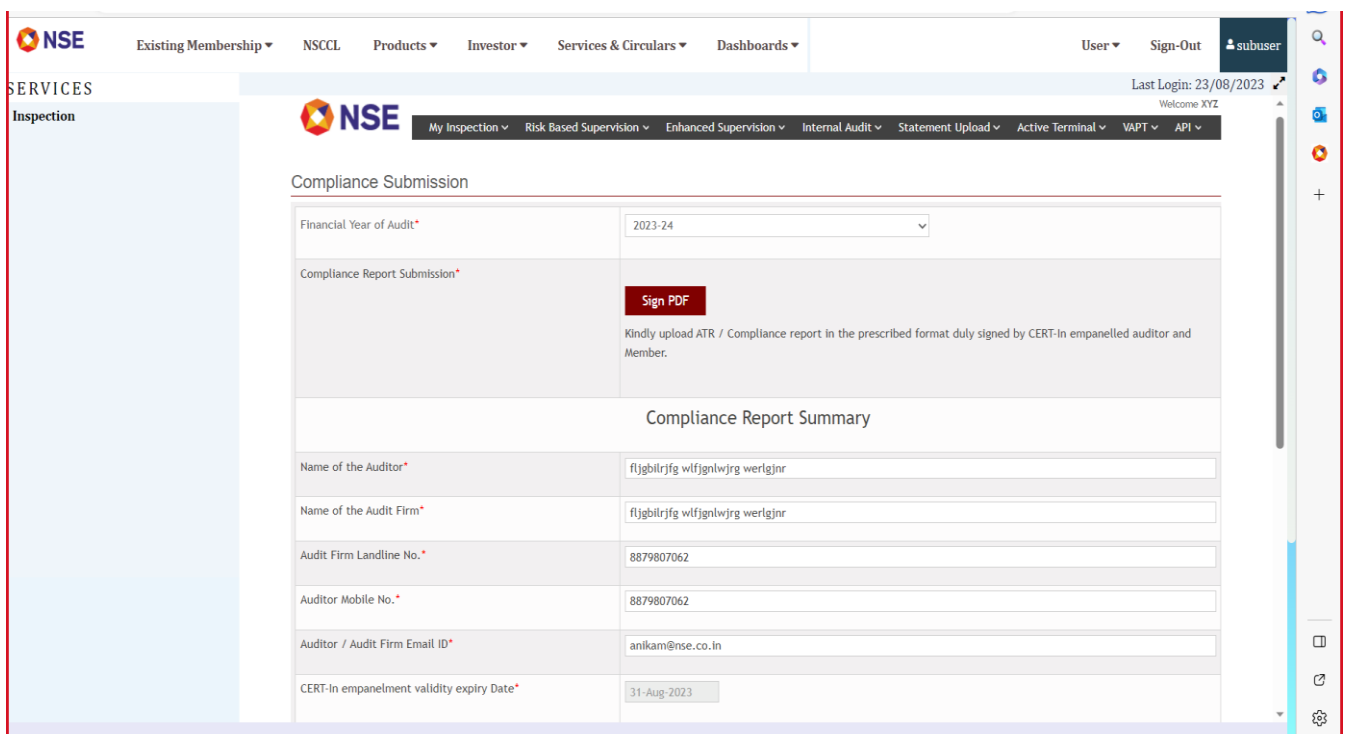
By clicking “**Submit Compliance report**”, the screen displayed below would open.

“Compliance Report Submission”

Compliance report (as attached in **Annexure – C**) 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)



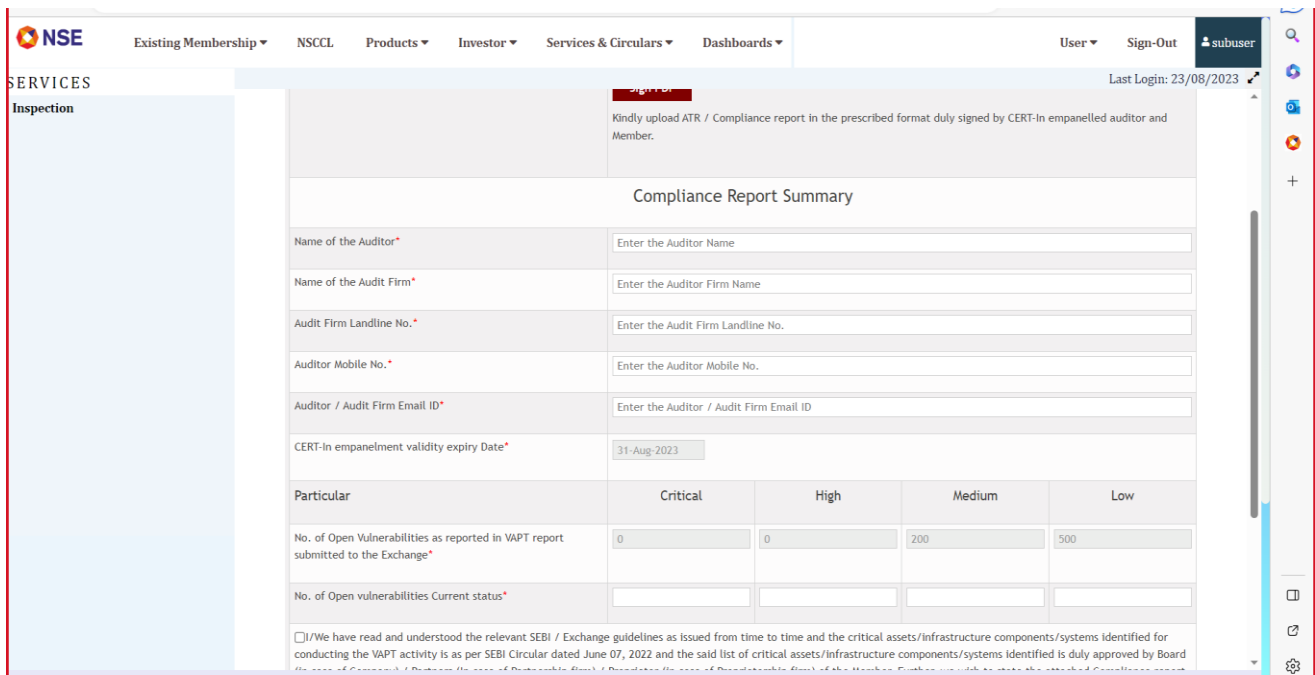
The screenshot shows the NSE web portal interface for 'Compliance Submission'. The page includes a navigation menu with options like 'Existing Membership', 'NSCL', 'Products', 'Investor', 'Services & Circulars', and 'Dashboards'. The user is logged in as 'subuser' with a last login on 23/08/2023. The main form area is titled 'Compliance Submission' and contains the following fields:

Financial Year of Audit*	2023-24
Compliance Report Submission*	<div style="text-align: center;"> Sign PDF </div> <p>Kindly upload ATR / Compliance report in the prescribed format duly signed by CERT-In empanelled auditor and Member.</p>
Compliance Report Summary	
Name of the Auditor*	fljgblrjfg wlfjgnlwjrg werlgjnr
Name of the Audit Firm*	fljgblrjfg wlfjgnlwjrg werlgjnr
Audit Firm Landline No.*	8879807062
Auditor Mobile No.*	8879807062
Auditor / Audit Firm Email ID*	anikam@nse.co.in
CERT-In empanelment validity expiry Date*	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 bar with 'Existing Membership', 'NSCCL', 'Products', 'Investor', 'Services & Circulars', and 'Dashboards'. The user is logged in as 'subuser' with a last login of '23/08/2023'. The form contains the following fields:

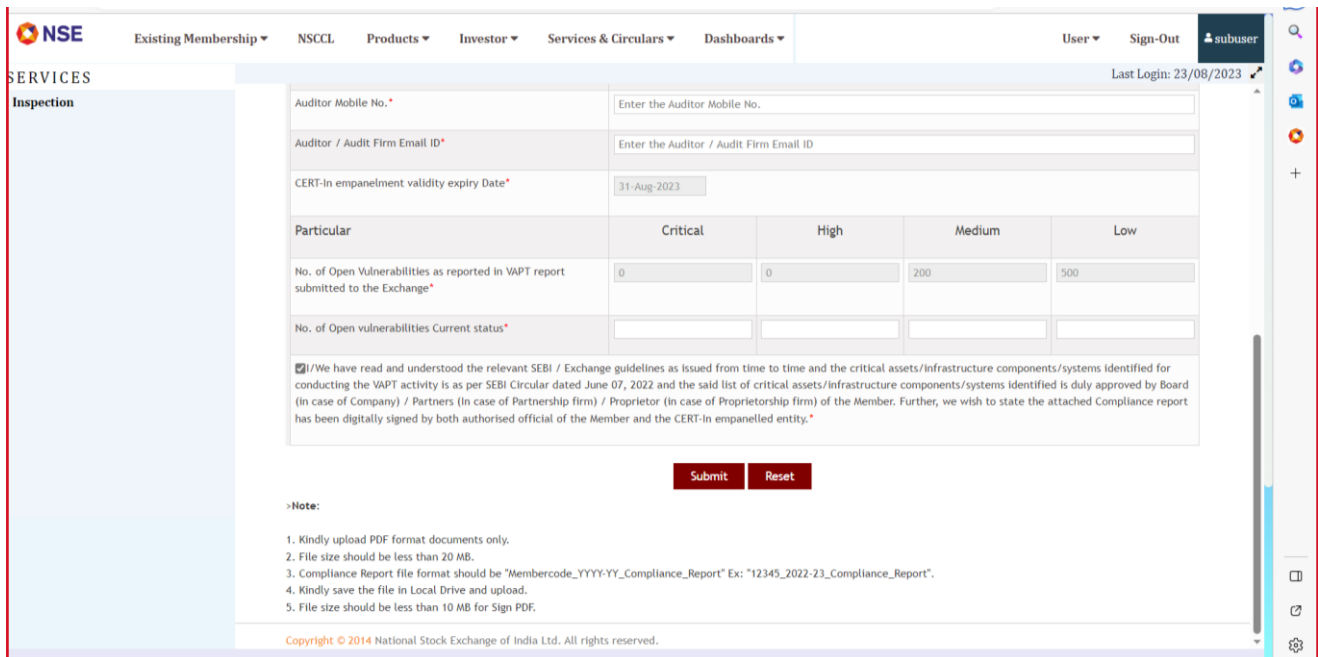
- Name of the Auditor***: Enter the Auditor Name
- Name of the Audit Firm***: Enter the Auditor Firm Name
- Audit Firm Landline No.***: Enter the Audit Firm Landline No.
- Auditor Mobile No.***: Enter the Auditor Mobile No.
- Auditor / Audit Firm Email ID***: Enter the Auditor / Audit Firm Email ID
- 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*				

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) / Partner (in case of Partnership firm) / Proprietor (in case of Proprietorship firm) of the Member. Furthermore, I/We agree to enter 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"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

/ 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.*

>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 - E

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

Non-submission of VAPT report and/or compliance report within below specified dates by Members (other than QSB's):

Details of Violation	Penalty/disciplinary actions	Penalty/disciplinary action in case of repeated violation
<p>Non-submission of VAPT report on or before December 31 and/or 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. 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 VAPT report and/or 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 VAPT report on or before June 30/December 31 and/or 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 hereunder: -

Categories of Risks	For All Members (other than QSBs)	For QSB Members
	Non closure of open vulnerabilities by March 31	Non closure of open vulnerabilities by March 31 (for HY September 30) and by September 30 (for HY 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/-
<p>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.</p>		