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**NATIONAL COMMODITY & DERIVATIVES EXCHANGE LIMITED**

Circular to all members of the Exchange

Circular No. : NCDEX/MEMBERSHIP-032/2025

Date : September 26, 2025

Subject : Extension for Upload of Client Records to KRAs for Validations

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This is with reference to SEBI Circular no. MIRSD/Cir-26/2011 dated December 23, 2011, and subsequent Exchange communications issued in regard, mandate that mandates that intermediaries, after completing the initial the KYC of new clients, must upload the KYC to the KRAs and dispatch the KYC documents within 10 working days from the date of execution of documents by the client.

Subsequently, SEBI Circular no. SEBI/HO/MIRSD/SECFATF/P/CIR/2023/169 dated October 12, 2023, revised this timeline to 3 working days from the date of completion of the KYC process

Further, SEBI Circular no. SEBI/HO/MIRSD/FATF/P/CIR/2023/0144 dated August 11, 2023, on "Simplification of KYC Process and Rationalisation of Risk Management Framework at KRAs," states that clients may begin transacting in the securities market upon completion of the KYC process. However, clients whose KYC attributes cannot be verified shall not be permitted to transact further until verification is completed.

A sample comparison of PANs registered in the UCC database with those available with the KRAs revealed that several Trading Members have not complied with the revised 3-day timeline for KYC uploads as per the October 12, 2023 circular. Non-upload of KYCs to KRAs is a non-compliance with the aforementioned regulatory requirements.

Trading Members are reminded that only clients with a KRA status of "KYC Registered" or "KYC Validated" are permitted to trade. This is essential for ensuring seamless interoperability across market participants and avoiding inconvenience to investors.

Subsequent to circular no. NCDEX/MEMBERSHIP-030/2025 dated September 03, 2025, the Exchange has received requests from multiple Trading Members seeking an extension of the compliance to the above refereed circular. In view of the same the timelines are now extended to **January 02, 2026**. The KRA status of the said PANs shall be verified with the respective KRAs. The PANs where the status is not validated by the KRAs shall neither be permitted to trade on the Exchange, nor will they be allowed to square up their open positions if any.

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Members are also advised to closely monitor the open positions of such clients and take appropriate measures to ensure compliance. For any queries or issues related to client KRA status, Members are requested to contact the respective KRAs directly.

For and on behalf of  
**National Commodity & Derivatives Exchange Limited**

Sushma Pothan  
Assistant Vice President

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For further information /clarifications, please contact

1. Customer Service Group on toll free number: 1800 26 62339
2. Customer Service Group by e-mail to : [askus@ncdex.com](mailto:askus@ncdex.com)