
NATIONAL COMMODITY & DERIVATIVES EXCHANGE LIMITED

Circular to all members of the Exchange

Circular No. : NCDEX/MEMBERSHIP-030/2025

Date : September 03, 2025

Subject : Upload of client records to KRAs for validations

This is with reference to SEBI Circular no. MIRSD/Cir- 26 /2011 dated December 23, 2011, which states that "After doing the initial KYC of the new clients, the intermediary shall forthwith upload the KYC information on the system of the KRA and send the KYC documents i.e. KYC application form and supporting documents of the clients to the KRA within 10 working days from the date of execution of documents by the client and maintain the proof of dispatch".

Subsequently, SEBI Master circular no. SEBI/HO/MIRSD/SECFATF/P/CIR/2023/169 dated October 12, 2023, at point 84 has modified the timeline of 10 days 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 KYC (Know Your Client) Registration Agencies (KRAs) states the following at points 4 & 8:

"In the interest of investors and for ease of transacting in securities market, the client shall be allowed to open an account with intermediaries and transact in securities market as soon as the KYC process is completed." and

"Clients in whose case, attributes of records as mentioned in para 5/6 above cannot be verified, shall not be allowed to transact further in securities market until the attributes are verified."

On a sample comparison of the clients PANs registered in the UCC database was done with that of the PANs available with the KRAs, it was observed that the Trading Members have not adhered to the point 84 of the circular dated October 12, 2023. It may be noted that non-upload of KYCs with the KRAs is not in compliance with the requirements of the above referred circulars.

Trading Members are hereby advised to ensure that the KYCs of all the active clients have been uploaded to the KRAs and only those clients are permitted to trade whose KRA status is either "KYC Registered" or "KYC Validated". This is essential to ensure seamless interoperability across market participants and avoid any inconvenience to the

investors. Trading Members are requested to prioritize this activity to ensure that all pending KYC records are uploaded without further delay.

Trading Members are hereby informed to ensure that the KYCs of all their active clients are uploaded and validated / registered by the KRAs latest by **September 26, 2025**. Further, the Members are also advised to specifically monitor the open positions, if any, of such clients and take appropriate measures to ensure compliance.

Members are further requested to contact the respective KRAs for any queries/issues pertaining to the status of their clients with the KRA.

All members are advised to ensure the above mentioned compliance.

For and on behalf of
National Commodity & Derivatives Exchange Limited

Sushma Pothan
Assistant Vice President

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