

Compliance Calendars

Compliance Calendar to be followed by SEBI Registered Entities for the month of **October 2025**

PMS Compliance Calendar

Sr.No.	Particulars	Due Date
1.	Submit List of Digital Platforms Provided & Compliance/Action Taken Report - for Compliance with Digital Accessibility requirement for Persons with Disabilities.	30.09.2025*
2.	Networth Certificate submission	30.09.2025*
3.	Annual Internal Audit	30.09.2025*
4.	Adoption and Making Available Standardised, Validated and Exclusive UPI IDs for Payment Collection-SEBI circular SEBI/HO/DEPA-II/DEPA-II_ SRG / P /CIR/2025/86 dated June 11,2025	01-10-2025
5.	Publishing of the Investor Charter and disclosure of Investor Complaints by Portfolio Managers on their websites	07.10.2025
6.	Monthly Report Submission to SEBI & APMI	10.10.2025(within 7 working days)**
7.	Submission of quarterly Offsite Inspection data to SEBI & APMI	15.10.2025**
8.	Quarterly Reporting to clients	31.10.2025
9.	SaaS Undertaking submission for the half year ended September 30, 2025	31.10.2025
10.	Appointment of IAAP certified accessibility professionals as Auditor	14-12-2025
11.	A quarterly report on compliance with SEBI regulations and guidelines, along with confirmation that due diligence has been exercised, must be presented to the Board.	During the Board Meeting (As applicable)
12.	PMS Disclosure Document in new format (Applicable in case of material changes)	Ongoing and Continuous Requirements

***The submission should have been completed by now. Kindly ensure immediate compliance if it has not yet been done.**

****The Portfolio Manager is advised to follow SEBI and/or APMI guidelines. In case they have received any specific communication after the deadline mentioned above, or under any other circumstances, they must ensure compliance with the directives accordingly.**



AIF Compliance Calendar

Sr.No.	Particulars	Due Date
1.	Submit List of Digital Platforms Provided & Compliance/Action Taken Report - for Compliance with Digital Accessibility requirement for Persons with Disabilities.	30.09.2025*
2.	Audit of compliance with PPM, findings, corrective actions	30.09.2025*
3.	Adoption and Making Available Standardised, Validated and Exclusive UPI IDs for Payment Collection-SEBI circular SEBI/HO/DEPA-II/DEPA-II_SRG / P /CIR/2025/86 dated June 11,2025	01.10.2025
4.	Disclosure of investor complaints	07.10.2025
5.	Quarterly reporting of investment activities to SEBI	15.10.2025
6.	Compliance report to the trustee (financial information & risk management)	30.10.2025
7.	SaaS Undertaking submission for the half year ended September 30, 2025	31.10.2025
8.	Disclosure of NAV of scheme(s) of the Category III AIF (for Close-ended)	Ideally, within a month
9.	Disclosure of NAV of scheme(s) of the Category III AIF (Open ended)	Ideally, within a month
10.	Reporting of overseas investments utilization to SEBI	Within 5 working days of such utilization
11.	Cash flows and valuation reporting to Benchmarking Agencies	15-11-2025
12.	Appointment of IAAP certified accessibility professionals as Auditor	14-12-2025
13.	<p>NISM requirements for Category I & II AIF: At least one person in the key investment team of the manager must obtain any one of the below certifications:</p> <ul style="list-style-type: none"> NISM Series-XIX-C: Alternative Investment Fund Managers Certification Examination, as per Communiqué No. NISM/Certification/Series-XIX-C/2024/01 dated January 10, 2024; or NISM Series-XIX-D: Category I and II Alternative Investment Fund Managers Certification Examination, as per Communiqué No. NISM/Certification/Series-XIX-D/2025/01 dated April 29, 2025. 	Ongoing and Continuous Requirements
14.	<p>NISM Certificate requirements for Category III AIF: At least one person in the key investment team of the manager must obtain any one of the below certifications:</p> <ul style="list-style-type: none"> NISM Series-XIX-C: Alternative Investment Fund Managers Certification Examination, as per Communiqué No. 	Ongoing and Continuous Requirements

	<p>NISM/Certification/Series-XIX-C/2024/01 dated January 10, 2024; or</p> <ul style="list-style-type: none"> NISM Series-XIX-E: Category III Alternative Investment Fund Managers Certification Examination, as per Communiqué No. NISM/Certification/Series-XIX-E/2025/02 dated April 29, 2025. 	
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Investment Adviser Compliance Calendar

Sr.No.	Particulars	Due Date
1.	Submit List of Digital Platforms Provided & Compliance/Action Taken Report - for Compliance with Digital Accessibility requirement for Persons with Disabilities.	30.09.2025*
2.	Adoption and Making Available Standardised, Validated and Exclusive UPI IDs for Payment Collection-SEBI circular SEBI/HO/DEPA-II/DEPA-II_SRG / P /CIR/2025/86 dated June 11,2025	01.10.2025
3.	Publishing of Investor Charter and disclosure of Investor Complaints by Investment Advisers on their websites/mobile applications.	07.10.2025
4.	Half-Yearly Periodic Reporting-For the half year ended September 30, 2025 (Please check the BSE circular and ensure compliance)	31.10.2025
5.	Completion of Annual Compliance Audit (For FY 2024-2025) and Submission to BSE along with observations and correction action (As applicable)	31.10.2025
6.	Maintenance of Deposit with BSE	31.10.2025
7.	SaaS Undertaking submission for the half year ended September 30, 2025-Please check the BSE guideline for submission	31.10.2025
8.	Appointment of IAAP certified accessibility professionals as Auditor	14-12-2025
	<p>Uploading of the latest Investment Charter on the following:</p> <ul style="list-style-type: none"> Uploaded on the official website Prominently displayed at the office premises Circulated via email to all existing clients Incorporated as part of the new Investment Adviser agreement for all new clients <p>- BSE notice dated 20250610-5 dated June 10, 2025 (If not yet implemented, please do the needful)</p>	Ongoing and Continuous Requirements
9.	Maintaining a Functional Website	Ongoing and Continuous Requirements
10.	MITC to clients	Ongoing and Continuous Requirements



11.	Maintenance of telephonic recordings of client interaction	Ongoing and Continuous Requirements
12.	Mandatory Client Declaration for Non-SEBI Regulated Products/ Services	Ongoing and Continuous Requirements

Research Analysts Compliance Calendar

Sr.No.	Particulars	Due Date
1.	Submit List of Digital Platforms Provided & Compliance/Action Taken Report - for Compliance with Digital Accessibility requirement for Persons with Disabilities.	30.09.2025*
2.	Adoption and Making Available Standardised, Validated and Exclusive UPI IDs for Payment Collection-SEBI circular SEBI/HO/DEPA-II/DEPA-II_SRG / P /CIR/2025/86 dated June 11,2025	01.10.2025
3.	Publishing of Investor Charter and disclosure of Investor Complaints by Investment Advisers on their websites/mobile applications	07.10.2025
4.	Half-Yearly Periodic Reporting-For the half year ended September 30,2025 (Please check the BSE circular and ensure compliance)	31.10.2025
5.	Completion of Annual Compliance Audit (For FY 2024-2025) and Submission to BSE along with observations and correction action (As applicable)	31.10.2025
6.	SaaS Undertaking submission for the half year ended September 30, 2025-Please check the BSE guideline for submission	31.10.2025
7.	Maintenance of Deposit with BSE	31.10.2025
8.	Appointment of IAAP certified accessibility professionals as Auditor	14-12-2025
9.	<p>Uploading of latest Investment Charter on the following:</p> <ul style="list-style-type: none"> Uploaded on the official website Prominently displayed at the office premises Circulated via email to all existing clients Incorporated as part of the new Investment Adviser agreement for all new clients <p>BSE notice dated 20250610-4 dated June 10, 2025 (If not yet implemented, please do the needful)</p>	Ongoing and Continuous Requirements
10.	Client-level segregation of Research and distribution activities (BSE notice 20250627-46 dated June 27, 2025)	Ongoing and Continuous Requirements
11.	Maintenance of telephone recordings of the client interaction (BSE notice 20250627-46 dated June 27, 2025)	Ongoing and Continuous Requirements

12.	Client Consent on Terms of Research Services (BSE notice 20250627-46 dated June 27, 2025)	Due Before Subscription Renewal or Fee Collection
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Merchant Banking Compliance Calendar

Sr.No.	Particulars	Due Date
1.	Submit List of Digital Platforms Provided & Compliance/Action Taken Report - for Compliance with Digital Accessibility requirement for Persons with Disabilities.	30.09.2025*
2.	Publishing Investor Charter and Disclosure of Complaints by Merchant Bankers on website	07.10.2025
3.	SaaS Undertaking submission for the half year ended September 30, 2025	31.10.2025
4.	Disclosure of Track Record of the public issues managed by Merchant Bankers	Ongoing and Continuous Requirements
5.	Appointment of IAAP certified accessibility professionals as Auditor	14-12-2025
6.	Half Yearly Compliance Report to SEBI	Upto December 31, 2025

Depository Participant (CDSL & NSDL) Compliance Calendar

Sr.No.	Particulars	Due Date
1.	Mandatory Capturing Of 'Date of Receipt' For Off-Market Delivery Instruction Slip while executing both intra-depository (CDSL to CDSL) and inter-depository (CDSL to NSDL) off-market instructions in the CDSL system.	27-09-2025*
2.	Submission of Compliance for Closure of Observations Raised During Annual System Audit	30.09.2025*
3.	Submit List of Digital Platforms Provided & Compliance/Action Taken Report - for Compliance with Digital Accessibility requirement for Persons with Disabilities.	30.09.2025*
4.	Adoption and Making Available Standardised, Validated and Exclusive UPI IDs for Payment Collection-SEBI circular SEBI/HO/DEPA-II/DEPA-II_SRG / P /CIR/2025/86 dated June 11,2025	01.10.2025
5.	Publishing of Investor Charter and disclosure of Investor Complaints on websites	07.10.2025
6.	Investor Grievances Report submission	10.10.2025
7.	Details of 2 day's notice given to BO prior to stopping the process of instructions in case of default in payment-CDSL	10.10.2025
8.	Submission of the report of Modification in URL reported to CDSL within 3 days of such changes	10.10.2025

9.	Indictment order against the DP (Information w.r.t. the indictment or any other orders passed against the DP by any competent authority, if any)- CDSL/AUDIT/DP/POLCY/2025/275 April 25, 2025-CDSL	10.10.2025
10.	Reporting of STR finding with FIU-India by DP (Information w.r.t. the STRs filed by the DP with FIU IND, if any)-CDSL	10.10.2025
11.	Implementation of SEBI Circular 'Margin obligations to be given by way of pledge/Repledge in the Depository System' dated June 03, 2025	10.10.2025
12.	Tariff Structure of the DP (Information w.r.t increase in charges /fees providing 30 days notice to the BOs, if any)-CDSL CDSL/AUDIT/DP/POLCY/2025/275 April 25, 2025	10.10.2025
13.	'Document Received Date' being made mandatory field in NSDL Depository system for an off-market transfer instruction executed in respect of physical DIS (NSDL circular NSDL/ POLICY / 2025/ 0123 September 16, 2025	10.10.2025
14.	Submission of Surveillance Obligations report for the quarter ended September 30,2025	15.10.2025
15.	Reporting of Cyber Security incidents for the quarter ended September 30,2025	15.10.2025
16.	Submission of report for Non-profit organization transactions	20.10.2025
17.	Compliance report w.r.t same Mobile number and/or email address captured for multiple accounts-NSDL	25.10.2025
18.	Submission of Networth Certificate and Audited Financial Statements	31.10.2025
19.	SaaS Undertaking submission for the half year ended September 30, 2025-Please check Depositories guidelines	31.10.2025
20.	Submission of Risk Assessment Template for the period ended 30.09.2025 -Please check Depositories guidelines	30.11.2025
21.	Appointment of IAAP certified accessibility professionals as Auditor	14-12-2025
22.	Extension Of Timeline for Implementation of Phase III of Nomination facility	15-12-2025
23.	Suspension of demat accounts of existing clients whose KYC records are not found to be valid by KRAs after the validation process.	Ongoing and Continuous Requirements

Stock Broking (BSE & NSE) Compliance Calendar

Sr.No.	Particulars	Due Date
1.	Submit List of Digital Platforms Provided & Compliance/Action Taken Report - for Compliance with Digital Accessibility requirement for Persons with Disabilities.	30.09.2025*
2.	Action Taken Report for Cyber Security & Cyber Resilience framework for Stock Brokers (Half Yearly)-Applicable for Qualified REs and Mid size, Small size REs who are providing IBT or Algo Trading facility.	30-09-2025*



3.	Action Taken Report for Cyber Security & Cyber Resilience framework for Stock Brokers (Yearly) Applicable for Mid-size, Small size REs NOT providing IBT or Algo Trading facility.	30-09-2025*
4.	Action Taken Report for VAPT Report (Half Yearly) for QSB's	30-09-2025*
5.	Action Taken Report for Cyber Security & Cyber Resilience Audit Report (Half Yearly) for QSB's	30-09-2025*
6.	Adoption and Making Available Standardised, Validated and Exclusive UPI IDs for Payment Collection-SEBI circular SEBI/HO/DEPA-II/DEPA-II_ SRG / P /CIR/2025/86 dated June 11,2025	01.10.2025
7.	Settlement of running account (For Quarterly Settlement & For those who have opted for monthly settlement & also for inactive accounts of more than 30 days)	03.10.2025 & 04.10.2025
8.	QSB to submit details of investor service centres	07.10.2025
9.	Publishing of Investor Charter and disclosure of Investor Complaints on Websites	07.10.2025
10.	Reporting for Artificial Intelligence (AI) and Machine Learning (ML) applications and systems offered for the quarter ended September 30, 2025	15.10.2025
11.	Submission of Surveillance Obligations report for the quarter ended September 30, 2025	15.10.2025
12.	Reporting of Cyber Security incidents for the quarter ended September 30, 2025	15.10.2025
13.	Submission of Bank Undertaking, Bank Authorization, Bank Confirmation in Revised Format with reference to circular NSE/INSP/70505 dated September 29, 2025	15-10-2025
14.	Quarterly submission of client-wise (UCC-wise) settlement information to the stock exchanges must be completed within 10 trading days from the settlement date (T+10)	17.10.2025
15.	Submission of Annual Returns for the period ended 31st March, 2025	31.10.2025
16.	Submission of Asset Inventory details and certification to NSE for the period ended 31.03.2025 (Subject to circular to be issued by NSE)	31.10.2025
17.	Revision in contract note format - Extension of timeline for MCX & NCDEX	31.10.2025
18.	Submission of Details of AP Inspections undertaken during the quarter ended 30.09.2025 (Even if NIL AP inspected, submission is mandatory)	31.10.2025
19.	Number of STR filed with FIU-IND for September 2025(Only BSE)	31.10.2025
20.	Safer participation of retail investors in Algorithmic trading- Retail algo product coming through API (In-house and through vendors) and at least one algo strategy shall be applied for registration with exchange by 31st October 2025	31-10-2025
21.	Half-yearly confirmation of entity type by RFQ participants	31-10-2025

22.	Submission of Half yearly Net worth certificate: Margin Trading Facility provided Members	15-11-2025
23.	Submission of Half yearly Net worth certificate: Non- Margin Trading Facility provided Members	30-11-2025
24.	Action Taken Report for VAPT Report (Yearly) - Applicable to Non-QSBs	30-11-2025
25.	Safer participation of retail investors in Algorithmic trading-Registration of retail algo products accessed via API (in-house and through vendors), along with a set of retail algo strategies, must be fully completed with the exchange.	30-11-2025
26.	Appointment of IAAP certified accessibility professionals as Auditor	14-12-2025
27.	Uploading of day-wise Holding statement in the specified standard format to Exchange (within next day)-All Exchanges	Daily Ongoing
28.	Cyber Security & Cyber Resilience framework for Stock Brokers / Depository Participants - Incident Reporting	Daily Ongoing
29.	Uploading of clients mapped with Authorised Persons (AP) before the next 2 trading days of subsequent week-All Exchanges	Weekly
30.	Requirement of sending a complete 'Statement of Accounts' for funds, securities and commodities in respect of each of its clients (within next four trading days of subsequent week)-All Exchanges	Weekly

****The submission should have been completed by now. Kindly ensure immediate compliance if it has not yet been done.***

Disclaimer:

Please note that the Compliance Calendar is intended as a general guideline and should not be considered definitive. For the most current and accurate information, we highly encourage you to refer to the latest circulars issued by the relevant Market Infrastructure Institutions. It is important to understand that we cannot be held liable for any compliance violations that may arise from reliance on this calendar.

If you require any assistance or have questions regarding compliance matters, please do not hesitate to contact us at compliance@sanjayshah.co.in

