

### Compliance Calendars

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

#### **PMS Compliance Calendar**

| Sr.No. | Particulars                                                                                                                                                           | Due Date                                                                  |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| 1.     | Publishing of the Investor Charter and disclosure of Investor Complaints by Portfolio Managers on their websites                                                      | <b>07.12.2025</b>                                                         |
| 2.     | Monthly Report Submission to SEBI & APMI                                                                                                                              | <b>09.12.2025<br/>(within 7 working days) **</b>                          |
| 3.     | Appointment of IAAP certified accessibility professionals as Auditor                                                                                                  | <b>14.12.2025</b>                                                         |
| 4.     | PMS Disclosure Document in a new format (Applicable in case of material changes)                                                                                      | <b>Ongoing and Continuous Requirements</b>                                |
| 5.     | 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. | <b>During the Board Meeting<br/>(As applicable)</b>                       |
| 6.     | Off Site Inspection Alerts (if any) received through a PARAS portal to be adequately responded                                                                        | <b>Please Login to the PARAS Portal &amp; close alerts, if applicable</b> |
| 7.     | TRAI guidelines- Mandatory Phase-wise Adoption of 1600-Series Numbers by SEBI Registered Intermediaries, if applicable                                                | <b>Voluntary adoption for time being</b>                                  |

***\*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.     | Appointment of IAAP certified accessibility professionals as Auditor | <b>14.12.2025</b>              |
| 2.     | Disclosure of NAV of scheme(s) of the Category III AIF (Open ended)  | <b>Ideally, within a month</b> |

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|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 3. | Reporting of overseas investments utilization to SEBI                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Within 5 working days of such utilization</b> |
| 4. | <p>NISM requirements for <b>Category I &amp; II AIF</b>:<br/>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"> <li>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</li> <li>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.</li> </ul> | <b>Ongoing and Continuous Requirements</b>       |
| 5. | <p>NISM Certificate requirements for <b>Category III AIF</b>:<br/>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"> <li>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</li> <li>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.</li> </ul> | <b>Ongoing and Continuous Requirements</b>       |
| 6. | <ul style="list-style-type: none"> <li>TRAI guidelines- Mandatory Phase-wise Adoption of 1600-Series Numbers by SEBI Registered Intermediaries, if applicable</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Voluntary adoption for time being</b>         |

#### Investment Adviser Compliance Calendar

| Sr.No. | Particulars                                                                                                                                                                                                                                                                                                                                                  | Due Date                                   |
|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| 1.     | Publishing of Investor Charter and disclosure of Investor Complaints by Investment Advisers on their websites/mobile applications.                                                                                                                                                                                                                           | <b>07.12.2025</b>                          |
| 2.     | Appointment of IAAP certified accessibility professionals as Auditor                                                                                                                                                                                                                                                                                         | <b>14.12.2025</b>                          |
|        | <p>Uploading of the latest Investment Charter on the following:</p> <ul style="list-style-type: none"> <li>Uploaded on the official website</li> <li>Prominently displayed at the office premises</li> <li>Circulated via email to all existing clients</li> <li>Incorporated as part of the new Investment Adviser agreement for all new clients</li> </ul> | <b>Ongoing and Continuous Requirements</b> |

|    |                                                                                                                                                                         |                                            |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
|    | - BSE notice dated 20250610-5 dated June 10, 2025 (If not yet implemented, please do the needful)                                                                       |                                            |
| 3. | Maintaining a Functional Website                                                                                                                                        | <b>Ongoing and Continuous Requirements</b> |
| 4. | MITC to clients                                                                                                                                                         | <b>Ongoing and Continuous Requirements</b> |
| 5. | Maintenance of telephonic recordings of client interaction                                                                                                              | <b>Ongoing and Continuous Requirements</b> |
| 6. | Mandatory Client Declaration for Non-SEBI Regulated Products/ Services                                                                                                  | <b>Ongoing and Continuous Requirements</b> |
| 7. | TRAI guidelines- Mandatory Phase-wise Adoption of 1600-Series Numbers by SEBI Registered Intermediaries, if applicable (BSE circular 20251126-3 dated November 26,2025) | <b>Voluntary adoption for time being</b>   |

#### Research Analysts Compliance Calendar

| Sr.No. | Particulars                                                                                                                                                                                                                                                                                                                                                                                                                                       | Due Date                                   |
|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| 1.     | Publishing of Investor Charter and disclosure of Investor Complaints by Research Analysts on their websites/mobile applications                                                                                                                                                                                                                                                                                                                   | <b>07.12.2025</b>                          |
| 2.     | Appointment of IAAP certified accessibility professionals as Auditor                                                                                                                                                                                                                                                                                                                                                                              | <b>14.12.2025</b>                          |
| 3.     | Uploading of latest Investment Charter on the following: <ul style="list-style-type: none"> <li>Uploaded on the official website</li> <li>Prominently displayed at the office premises</li> <li>Circulated via email to all existing clients</li> <li>Incorporated as part of the new Investment Adviser agreement for all new clients</li> </ul> BSE notice dated 20250610-4 dated June 10, 2025 (If not yet implemented, please do the needful) | <b>Ongoing and Continuous Requirements</b> |
| 4.     | Client-level segregation of Research and distribution activities (BSE notice 20250627-46 dated June 27, 2025)                                                                                                                                                                                                                                                                                                                                     | <b>Ongoing and Continuous Requirements</b> |
| 5.     | Maintenance of telephone recordings of the client interaction (BSE notice 20250627-46 dated June 27, 2025)                                                                                                                                                                                                                                                                                                                                        | <b>Ongoing and Continuous Requirements</b> |
| 6.     | Client Consent on Terms of Research Services (BSE notice 20250627 -46 dated June 27, 2025)                                                                                                                                                                                                                                                                                                                                                        | <b>Due Before Subscription</b>             |

|           |                                                                                                                                                                         | <b>Renewal or Fee Collection</b>         |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| <b>7.</b> | TRAI guidelines- Mandatory Phase-wise Adoption of 1600-Series Numbers by SEBI Registered Intermediaries, if applicable (BSE circular 20251126-2 dated November 26,2025) | <b>Voluntary adoption for time being</b> |

**Merchant Banking Compliance Calendar**

| <b>Sr.No.</b> | <b>Particulars</b>                                                                      | <b>Due Date</b>                            |
|---------------|-----------------------------------------------------------------------------------------|--------------------------------------------|
| <b>1.</b>     | Publishing Investor Charter and Disclosure of Complaints by Merchant Bankers on website | <b>07.12.2025</b>                          |
| <b>2.</b>     | Appointment of IAAP certified accessibility professionals as Auditor                    | <b>14.12.2025</b>                          |
| <b>3.</b>     | Half Yearly Compliance Report to SEBI                                                   | <b>31.12.2025</b>                          |
| <b>4.</b>     | Disclosure of Track Record of the public issues managed by Merchant Bankers             | <b>Ongoing and Continuous Requirements</b> |

**Depository Participant (CDSL & NSDL) Compliance Calendar**

| <b>Sr.No.</b> | <b>Particulars</b>                                                                                                                                                                                               | <b>Due Date</b>   |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| <b>1.</b>     | Publishing of Investor Charter and disclosure of Investor Complaints on websites                                                                                                                                 | <b>07.12.2025</b> |
| <b>2.</b>     | Monthly Investor Grievances Report submission                                                                                                                                                                    | <b>10.12.2025</b> |
| <b>3.</b>     | Details of 2 days' notice given to BO prior to stopping the process of instructions in case of default in payment-CDSL                                                                                           | <b>10.12.2025</b> |
| <b>4.</b>     | Submission of the report of Modification in URL reported to CDSL within 3 days of such changes                                                                                                                   | <b>10.12.2025</b> |
| <b>5.</b>     | 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               | <b>10.12.2025</b> |
| <b>6.</b>     | 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                                                                                            | <b>10.12.2025</b> |
| <b>7.</b>     | Implementation of SEBI Circular 'Margin obligations to be given by way of pledge/Repledge in the Depository System' dated June 03, 2025                                                                          | <b>10.12.2025</b> |
| <b>8.</b>     | Tariff Structure of the DP (Information w.r.t increase in charges /fees providing 30 days' notice to the BOs, if any) CDSL/ AUDIT/ DP/ POLCY/2025/275 April 25, 2025                                             | <b>10.12.2025</b> |
| <b>9.</b>     | 'Document Received Date' being made mandatory field in NSDL Depository system for an off-market transfer instruction executed in respect of physical DIS (Circular No.: NSDL/POLICY/2025/0153 November 19, 2025) | <b>12.12.2025</b> |

|     |                                                                                                                                                                      |                                         |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| 10. | Appointment of IAAP certified accessibility professionals as Auditor                                                                                                 | 14.12.2025                              |
| 11. | Timeline for Implementation of Phase III of Nomination facility                                                                                                      | 15.12.2025                              |
| 12. | Submission of report for Non-profit organization transactions                                                                                                        | 20.12.2025                              |
| 13. | Compliance report w.r.t same Mobile number and/or email address captured for multiple accounts-NSDL                                                                  | 25.12.2025                              |
| 14. | Conduct of VAPT through Cert-in Auditor and report shall be submitted to Depository after approval from respective IT Committee (applicable to QSBs & protected REs) | 31.12.2025                              |
| 15. | 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     |
| 16. | TRAI Direction for Mandatory Variable Tagging and Template Validation Timelines. (NSDL circular: NSDL/POLICY/2025/0156 November 27, 2025)                            | Adherence to Guideline in phased manner |

**Stock Broking (BSE & NSE) Compliance Calendar**

| Sr.No. | Particulars                                                                                                                                                                  | Due Date                |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| 1.     | Submission of Internal Audit Report for the Half Yearly ended September 30,2025                                                                                              | 30.11.2025*             |
| 2.     | Submission of Half Yearly Networth Certificate as on September 30,2025                                                                                                       | 30.11.2025*             |
| 3.     | Submission of Risk Based Supervision Data for the period April 01, 2025 – September 30, 2025                                                                                 | 30.11.2025*             |
| 4.     | Applicability of joint annual inspection by MIIs - information sharing mechanism- action by Lead MII SEBI circular no: 2025/113 dated: 07-08-2025                            | 01.12.2025              |
| 5.     | Actions Taken in prescribed format in FATF module in “ENIT New Compliance”                                                                                                   | 05.12.2025              |
| 6.     | Settlement of running account (Applicable for clients who have opted for monthly settlement & also for inactive accounts of more than 30 days)                               | 05.12.2025 & 06.12.2025 |
| 7.     | Framework for Intraday Position Limits Monitoring for Equity Index Derivatives-at the end of glide path of FutEq based positions limits SEBI circular dated September 1,2025 | 06.12.2025              |
| 8.     | Publishing of Investor Charter and disclosure of Investor Complaints on Websites                                                                                             | 07.12.2025              |



|     |                                                                                                                                                                                                                                                                                                                                                                |                                            |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| 9.  | Applicability of Block deal Framework-SEBI circular dated October 8, 2025                                                                                                                                                                                                                                                                                      | <b>07.12.2025</b>                          |
| 10. | Completion of System Audit Appointment & Submission of Audit Plan of Trading Members (TYPE-III)                                                                                                                                                                                                                                                                | <b>10.12.2025</b>                          |
| 11. | Appointment of IAAP certified accessibility professionals as Auditor                                                                                                                                                                                                                                                                                           | <b>14.12.2025</b>                          |
| 12. | Relaxation in timeline to submit net worth certificate by Stock Brokers to offer margin trading facility to their clients the half year ended on September 30, 2025                                                                                                                                                                                            | <b>15.12.2025</b>                          |
| 13. | Preliminary Audit Report for System Audit Report of Trading Members (TYPE-III)                                                                                                                                                                                                                                                                                 | <b>31.12.2025</b>                          |
| 14. | Cyber Security & Cyber Resilience framework for Stock Brokers (who are providing IBT or Algo Trading facility) for the half year ended September 30,2025 - SEBI Circular No. SEBI/HO/ ITD1/ ITD _ CSC_EXT/P/CIR/20 24/113 dated August 20, 2024 and NSE Circular No - NSE/INSP/63502 dated August 21, 2024- <i>Please check Exchange further clarification</i> | <b>31.12.2025</b>                          |
| 15. | Cyber Security & Cyber Resilience framework (Preliminary Report) for QSB for the half year ended September 30,2025 - SEBI Circular No. SEBI/HO/ ITD1/ ITD _ CSC_EXT/P/CIR/20 24/113 dated August 20, 2024 and NSE Circular No - NSE/INSP/63502 dated August 21, 2024                                                                                           | <b>31.12.2025</b>                          |
| 16. | Conduct of Half-yearly VAPT audit for the half year ended September 30,2025 through Cert-in Auditor and report shall be submitted to Exchange after approval from respective IT Committee- (applicable to QSBs & protected REs)-NSE circular Download Ref No: NSE/INSP/70471 dated September 26,2026                                                           | <b>31.12.2025</b>                          |
| 17. | Remisiers are to be discontinued as market intermediaries registered on the Exchange (Refer BSE Circular No. 20250912-10 dated September 12,2025)                                                                                                                                                                                                              | <b>31.12.2025</b>                          |
| 18. | Submission of Annual Returns for Financial Year 2024-25                                                                                                                                                                                                                                                                                                        | <b>31.12.2025</b>                          |
| 19. | Number of STR filed with FIU-IND for October 2025(Only BSE)                                                                                                                                                                                                                                                                                                    | <b>Before 31.12.2025</b>                   |
| 20. | Uploading of day-wise Holding statement in the specified standard format to Exchange (within next day)-All Exchanges                                                                                                                                                                                                                                           | <b>Daily Ongoing</b>                       |
| 21. | Uploading of clients mapped with Authorised Persons (AP) before the next 2 trading days of subsequent week-All Exchanges                                                                                                                                                                                                                                       | <b>Weekly</b>                              |
| 22. | 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                                                                                                                                                                            | <b>Weekly</b>                              |
| 23. | Submission of Bank Undertaking, Bank Authorization, Bank Confirmation in <b><u>Revised Format</u></b> with reference to circular NSE/INSP/70505 dated September 29, 2025                                                                                                                                                                                       | <b>Ongoing and Continuous Requirements</b> |
| 24. | Revised format for submission of applications (i.e. Change in designated/non designated directors/ Partners/ Shareholding/                                                                                                                                                                                                                                     | <b>Ongoing and Continuous</b>              |

|            |                                                                                                                                                                                                                                           |                                                            |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
|            | Increase In Share Capital/Change in Control/Change in name/Registered Office etc.)- NSE circular Download Ref No: NSE/COMP/70848 dated October 15,2025                                                                                    | <b>Requirements (As applicable)</b>                        |
| <b>25.</b> | Couple of submissions applicable to Qualified Stock Broker- BSE circular 20250718-8 Dated July 18,2025                                                                                                                                    | <b>Ongoing and Continuous Requirements (As applicable)</b> |
| <b>26.</b> | TRAI guidelines- Mandatory Phase-wise Adoption of 1600-Series Numbers by SEBI Registered Intermediaries for other than Qualified Stockbrokers (QSBs), as identified in the list published annually on the websites of the Stock Exchanges | <b>Voluntary adoption for time being</b>                   |

***\*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](mailto:compliance@sanjayshah.co.in)***

