

KARVY/OPS/INTERM/GENRL/24-006

May 26, 2024

Review of Validation of KYC records under Risk Management Framework

Attention of all SEBI Registered Intermediaries (SRIs) is drawn to SEBI circular ref no. SEBI/HO/MIRSD/SECFATF/P/CIR/2024/41 dated May 14, 2024, FAQs issued by SEBI on May 14, 2024 and directions from SEBI on this subject.

SRIs are requested to take note of table below with regard to changes in KYC validation and verification process at KRAs w.e.f. June 01, 2024 as per directions from SEBI.

| Sr | Attributes for | Result of validation at | Status of | Remarks |
|-----|-------------------------|------------------------------|------------|---------------------------|
| No. | Validation / | KRAs | KYC record | |
| | Verification by KRAs | | in KRA | |
| | | | system | |
| A | i) PAN is Existing and | All 5 points i.e A-(i) to A- | KYC | As per FAQs issued by |
| | Valid. | (v) are validated by KRAs. | Validated | SEBI, Mobile is |
| | | | | mandatory to be uploaded |
| | ii) Name and DOB in | (There is no change in this | | in KRA system for KYC |
| | KYC data matches with | process currently followed | | records where online KYC |
| | ITD records | by KRAs and will be | | is done by SEBI |
| | | continued on as is basis) | | Registered Intermediaries |
| | iii) Name and Address | | | (SRIs). |
| | in KYC data matches | | | |
| | with source XML file or | | | |
| | details extracted post | | | |
| | scanning of QR code on | | | |
| | e-AADHAAR, m- | | | |
| | AADHAAR or scanned | | | |
| | copy of AADHAAR | | | |
| | card as | | | |
| | uploaded/provided | | | |
| | alongwith the KYC | | | |
| | record by SEBI | | | |



| Sr | Attributes for | Result of validation at | Status of | Remarks |
|-----|-------------------------|--|------------|---------|
| No. | Validation / | KRAs | KYC record | |
| | Verification by KRAs | | in KRA | |
| | - | | system | |
| | registered Intermediary | | - | |
| | (SRI) | | | |
| | | | | |
| | iv) Both email and | | | |
| | mobile as uploaded by | | | |
| | SRI in KYC record is | | | |
| | validated through | | | |
| | delivery of email/sms | | | |
| | or through OTP. | | | |
| | | | | |
| | v) PAN AADHAAR | | | |
| | linkage response from | | | |
| | ITD is any of Yes or | | | |
| | PAN is Operative for | | | |
| | Resident Indian | | | |
| | category of Investors | | | |
| | and is Not applicable | | | |
| | and PAN is Operative | | | |
| | for NRI, Foreign | | | |
| | National category of | | | |
| | investors, persons of | | | |
| | age 80 years and above | | | |
| | and PAN holders from | | | |
| | state of Assam, | | | |
| | Meghalaya and Jammu | | | |
| | and Kashmir. | | | |
| | | Points A-(i), A-(ii) are | KYC | |
| | | validated by KRAs. | Registered | |
| | | C W-1: 1 - 4' C 1/3// | | |
| | | Source Validation of KYC as in point no A-(iii) cannot | | |
| | | be performed by KRAs/ is | | |
| | | not possible. | | |
| | | 1 | | |



| Sr | Attributes for | Result of validation at | Status of | Remarks |
|-----|-----------------------|--|------------|---------|
| No. | Validation / | KRAs | KYC record | |
| | Verification by KRAs | | in KRA | |
| | | | system | |
| | | With regard to point A-(iv) Either email or mobile get validated by KRAs Point no A-(v) PAN and AADHAAR not linked /PAN is not operative as per response received from ITD by KRAs. | | |
| | | Points A-(i),A-(ii),A-(iii) are validated by KRAs and A-(v)-(PAN may be operative / inoperative) However, neither email nor mobile gets validated by KRAs (Point no A-(iv)) | | |

SRIs are requested to note below with respect to existing KYC records to be updated by KRAs by May 31, 2024.

- 1. Status of all records put on hold due to non-validation of email, mobile or both at KRAs will be checked and KYC records where either mobile is validated but email isn't and where email is validated but mobile isn't will be changed from **On Hold** status to **KYC Registered status** irrespective of any KYC type and any OVD (including deemed OVD) for all individual category of investors.
- 2. In case of KYC records where only email is uploaded or only mobile is uploaded and these aren't validated will continue to be retained in **On Hold** status.



- 3. Status of all records put on hold due to PAN AADHAAR linkage non compliance will be changed from **On Hold** status to **KYC Registered** status irrespective of any KYC type and any OVD (including deemed OVD) for all individual category of investors.
- 4. The KYC status changes in existing KYC records will be intimated by KRAs to all Stock Exchanges and both Depositories.

Further, SRIs may note that KYC records uploaded and to be uploaded under category Non Resident Indian (NRI) and in **KYC Registered** status will be allowed to transact with their existing SRIs and will also be allowed to transact with new SRIs till April 30, 2025.

Intermediary queries related to this communique may be addressed to kra@karvy.com or contact KARVY helpdesk 8121096850/8019355102.

Regards Sd/-A.Phanindra Kumar Compliance Officer