KRA CIRCULAR

Ref No: KARVY/OPS/INTERM/GENRL/26-001   **Date: January 10, 2026**

Subject: Upload of Latest UBO, Balance Sheet and Shareholding Pattern with KRA for KYC Records Held by Non-Individuals

This is in continuation of our earlier Communique bearing reference no. KARVY/OPS/INTERM/GENRL/25-003 dated February 19, 2025 whereby it was informed that SEBI Registered Intermediaries ("SRIs") linked with Non Individual KYC records (uploading / modifying/ fetching / downloading) in KRA system are required to ensure that the latest Ultimate Beneficial Owner ("UBO") details, Shareholding pattern ("SHP") and latest Balance Sheet ("BS") are available in KRA system and if these are not available the SRI need to collect the same from the investor and upload on KRA using facility of KYC modification request/s.

IMPLEMENTATION BY KARVY KRA

KARVY KRA shall shortly enabled the functionality for uploading updated UBO, SHP, and BS details on the KRA system.

UAT Environment Availability:
The upload functionality will be made available on the UAT/Pilot server (https://uat.karvykra.com/) from January 15, 2026 to February 15, 2026. SRIs are advised to utilize this period for system testing and validation.

APPLICABILITY OF UPLOAD FACILITY

THE FACILITY SHALL BE APPLICABLE FOR:

- New KYC Registrations
- Direct Modifications
- IOP-based Modifications

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For modifications, full KYC modification (including UBO / SHP / BS) or standalone document submission may be performed. Modification requests can be lodged for KYC records held with KARVY KRA or other KRAs.

REFERENCE DOCUMENTATION:

SRIs shall refer to the Process Manual appended, which prescribes the detailed procedure for uploading UBO, SHP, and BS data to the KARVY KRA system

TESTING & ISSUE RESOLUTION

SRIs, in coordination with KRAs, shall initiate UAT testing, identify system gaps or validation errors, and ensure accurate and complete upload of UBO, SHP, and BS data. All discrepancies observed during UAT must be resolved before production rollout.

QUERIES & SUPPORT

✉ **Email:** kra@karvydata.com

📞 **Helpdesk:** 8121096850 / 8019355102

Regards,

Sd/-
A. Phanindra Kumar
Compliance Officer

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PROCESS MANUAL FOR UPLOAD OF UBO, BS AND SHP

For UBO (Ultimate Beneficial Owner)

Field Name	Mandatory/Optional	Description / Validation
UBO Details	-	-
UBO Applicable	Mandatory	Provide Y, X, N and E options for selection and options validation should be applicable as per below: ➢ Y for Applicable (For fresh and modification KYC) – where new data is being uploaded ➢ X for Exempt (For fresh and modification KYC) – reasons for exemption to be selected from dropdown field ➢ N for "No" & "Not Applicable" (For fresh and modification KYC) ➢ E for Existing (For modification KYC) – if no changes are needed in existing records When updating UBO details, the existing information (if any) will be shown. If no data is available, the default option will be set to 'N'.
Date of UBO Applicable (Y)	Mandatory	If user select UBO applicable as "Y" then display this field and date cannot be future date. This indicates the date of the document e.g. UBO is of 31/03/2025 (DD/MM/YYYY).
Date of UBO Applicable Declaration (Y, E, N or X)	Mandatory	If user select UBO applicable as "Y,E,N or X " then display this field and date cannot be future date. This indicates the date of collection of the declaration by the SRI from the investor e.g. in above case if the UBO is collected by the SRI from the Investor on 15/12/2025 (DD/MM/YYYY).
UBO Exempt (X)	Mandatory	If user select UBO applicable as "X" then display following options in dropdown: ➢ Entity listed on a stock exchange in India (U01) ➢ Entity resident and listed in jurisdictions notified by the Indian Central Government (foreign stock exchanges) (U02) ➢ Subsidiary of such listed entity (U03) ➢ Government Company (U04)

For SHP (Share Holding Pattern)

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Field Name	Mandatory/ Optional	Description / Validation
SHP Details		
SHP Applicable	Mandatory	Provide Y, N and E options for selection and options validation should be applicable as per below: ➢ Y for Submitted (For fresh and modification KYC) ➢ N for Not Applicable (For fresh and modification KYC) ➢ E for Existing (No change) (For modification KYC) Note: When an entity modifies existing SHP data, the current values should be displayed for reference. If no existing data is available, the default selection should be set to 'N'.
Date of SHP (Y) (DD/MM/YYYY)	Mandatory	If user select SHP applicable as "Y" then display this field and date cannot be future date)
Date of SHP Declaration (Y, N or E) (DD/MM/YYYY)	Mandatory	If user select SHP applicable as "Y, N or E" then display this field and date cannot be future date)

For BS (Balance Sheet)

Field Name	Mandatory/Optional	Description / Validation
BS Details		
BS Applicable	Mandatory	Provide Y, N and E option for selection and options validation should be applicable as per below: ➢ Y for Submitted (For fresh and modification KYC) ➢ N for Not Applicable (For fresh and modification KYC) ➢ E for Existing (For fresh and modification KYC) Note: When an entity modifies existing BS data, always display the latest (maximum) date available for reference. If no existing data is available, the default selection should be set to 'N'.
Date of Balance Sheet 1 (Y) [Preceding 1st year - DD/MM/YYYY]	Mandatory	If user select BS applicable as "Y" then display this field and date cannot be future date) – For fresh and modification KYC.