# NOTICES

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| **Notice No.** | 20250926-63 | **Notice Date** | 26 Sep 2025 |
| **Category** | Compliance | **Segment** | General |
| **Subject** | Clarifications regarding VAPT timelines for FY 2025-26 | | |
| **Attachments** | Annexure 1.pdf ; Annexure 2.pdf ; Annexure 3.pdf | | |

**Content**

To All Trading Members,

This is with reference to SEBI Circular No-SEBI/HO/ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024, on ‘Cybersecurity and Cyber Resilience Framework (CSCRF) for SEBI Regulated Entities (REs) and subsequent clarification circulars dated December 31, 2024, March 28, 2025, April 30, 2025, August 28, 2025, and Frequently Asked Questions (FAQ) dated June 11, 2025 issued by SEBI.

As per point no 4.3.2 of the CSCRF circular dated August 20, 2024, REs/trading members shall plan their VAPT activity in the beginning of the financial year. RE’s/trading members shall ensure that no audit cycle shall be left unaudited (if any) due to the change in categorization. In all such cases, the unaudited period shall be included in the upcoming/next audit cycle.

For the implementation of CSCRF guidelines for VAPT audit by REs, following timelines have been prescribed in consultation with SEBI, for the conduct & submission of VAPT Report for trading members falling under Self-certification RE’s, Small-size RE’s, Mid-size RE’s and Qualified RE’s (not categorized as QSB’s):

**i) Once in a Year - Financial Year (April 2025 – March 2026):**

| Yearly Submission | Due Date |
|---|---|
| Conduct of VAPT through Cert-in Auditor | June 30, 2026 |
| VAPT report shall be submitted to Exchange after approval from respective IT Committee | July 31, 2026 |
| Submission of ATR/Revalidation report through Cert-in Auditor providing closure status after approval from respective IT Committee | November 30, 2026 |

Further, there shall be no change in the timelines for the conduct & submission of VAPT report for trading members categorised as QSBs and REs which have been identified as ‘Protected systems’ and/or CII by NCIIPC. The submission timelines are as follows: -

**ii) Half-yearly period-April 2025 – September 2025 (applicable to QSBs & protected REs)**

| VAPT for Half Yearly period ending September 30, 2025 | Due Date |
|---|---|
| Conduct of VAPT through Cert-in Auditor and report shall be submitted to Exchange after approval from respective IT Committee | December 31, 2025 |
| Submission of ATR/Revalidation report through Cert-in Auditor providing closure status after approval from respective IT Committee | March 31, 2026 |

**iii) Half-yearly period- October 2025 – VAPT for Half Yearly period ending March 31, 2026**

| VAPT for Half Yearly period ending March 31, 2026 | Due Date |
|---|---|
| Conduct of VAPT through Cert-in Auditor and report shall be submitted after approval from respective IT Committee | June 30, 2026 |
| Submission of ATR/Revalidation report through Cert-in Auditor providing closure status after approval from respective IT Committee | September 30, 2026 |

The comprehensive scope of VAPT shall include all critical assets and infrastructure components including (not limited to) Networking systems, Security devices, Servers, Databases, Applications, Systems accessible through WAN, LAN as well as with public IP’s, websites, etc. The detailed scope of VAPT and testing methodologies for conduct of VAPT activity (Half Yearly/Yearly) shall be in accordance with **Annexure – L** of the SEBI CSCRF circular dated August 20, 2024, same is enclosed as **Annexure–1.**

The updated formats of VAPT Audit report/Summary, Declaration from REs and Auditor, Assessment Details in accordance with SEBI CSCRF has been enclosed as **Annexure–2**. Further as per SEBI Circular no- SEBI/HO/ ITD-1/ITD_CSC_EXT/P/CIR/2025/119 dated August 28, 2025- on Technical Clarifications to CSCRF for SEBI Regulated Entities (REs), REs/trading members shall NOT submit details of explicit vulnerabilities (detailed report) unless and otherwise asked for the details by SEBI/Exchanges.

However, Trading Members/REs are required to maintain records of detailed VAPT report as per format provided in Point 7 of **Annexure- A** of SEBI circular no. SEBI/HO/ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024, and retain records of VAPT report along with POCs for a minimum period of three years. The detailed report shall be required to submit by REs/trading members as & when sought by SEBI/Exchanges.

For the conduct of VAPT and appointment of auditor/auditing organization, RE’s/Trading Members are required to refer auditor selection norms provided in Annexure-3, which are in accordance with norms specified in SEBI Cir no- SEBI/HO/ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024.

Further, guidelines for submission of reports on online portal and other related details shall be communicated through a separate circular.

All members are advised to take note of the above to bring the provisions of this circular to the notice of the auditors and put in place adequate systems and procedures to ensure strict adherence to the compliance requirements.

In case of any clarifications, Members / Stockbrokers may contact on below provided contact details:

| Contact | Contact No. | Email ID |
|---|---|---|
| Member Oversight | 022 - 2272 8888 | member(dot)vapt(at)bseindia(dot)com |

**For and on behalf of BSE Ltd**

**Devendra Kulkarni Bipin Veliyam**

**Deputy Vice President** **Deputy Vice President**

**Member Oversight** **Member Oversight**