

#### CDSL/RISK/DP/POLCY/2024/301

June 06, 2024

### SUBMISSION OF ANNUAL SYSTEM AUDIT REPORT

Depository Participants are advised to refer to CDSL Communiqué CDSL/A,I&C/DP/POLCY/2023/298 dated May 16, 2023, on 'Submission of Annual System Audit Report'.

Further, as per the requirements specified under SEBI Circular no. SEBI/HO/MIRSD/TPD/P/CIR/ 2022/80 dated June 07, 2022 (Communique no. CDSL/OPS/DP/POLCY/ 2022/323 dated June 09, 2022) the checklist for submission of the report has been modified (enclosed as Annexure I). In terms of para 3 of the above-mentioned SEBI Circular DPs are required to submit a declaration from their MD/ CEO/ Partners/ Proprietors certifying compliance by them with all SEBI Circulars and advisories related to Cyber security from time to time, along with the Annual System Audit Report.

DPs are advised to refer to the user manual for submitting the report enclosed as Annexure II and III (The auditor appointed by the DP shall refer to Annexure II for instructions on submitting the information and the designated officer of the DP shall refer to Annexure III for instructions on submitting the report). DPs are required to ensure compliance by submitting the system audit report as per the schedule given below:

Additionally, Participants (DPs) are hereby requested to take note of the following.

• For each instance of non-compliance reported, auditors must assign a risk rating of 'High', 'Medium', or 'Low' This is a mandatory requirement.



Report	Periodicity/ Frequency	Due date of	Action Taken Report
		submission	(ATR) Submission (if
			applicable)
Annual System	Annually	Within three months	Within three months
Audit Report (Cybe	· (Online submission on	of the end of the	from the date of
Security Annua	https://auditweb.cdslindia.com.	financial year.	submission.
Report)	For user manual, refer	i.e. by 30th June.	i.e. 30 <sup>th</sup> September.
	Annexure II and III)		

Queries regarding this communiqué may be sent to CDSL – Helpdesk through e-mail on <u>dprtasupport@cdslindia.com</u> or <u>dpinfosec@cdslindia.com</u> or call us on 022-62343333.

For and on behalf of Central Depository Services (India) Limited

sd/-

Ashwin Lalchandani Assistant Vice President – Risk Management



### Annexure I

Audit	Description		
TOR			
Clause			
1	Governance		
1(a)	Whether the Participant has formulated a comprehensive Cyber Security and Cyber		
	Resilience policy document encompassing the framework mentioned in the circular?		
	In case of deviations from the suggested framework, whether reasons for such deviations,		
	technical or otherwise, are provided in the policy document?		
	Is the policy document approved by the Board / Partners / Proprietor of the organization?		
	Is the policy reviewed periodically or at least on annual basis?		
1(b)	Whether the Cyber Security Policy includes the following process to identify, assess, and		
	manage Cyber Security risk associated with processes, information, networks and systems:		
	a. 'Identify' critical IT assets and risks associated with such assets.		
	b. 'Protect' assets by deploying suitable controls, tools and measures.		
	c. 'Detect' incidents, anomalies and attacks through appropriate monitoring		
	tools/processes.		
	d. 'Respond' by taking immediate steps after identification of the incident, anomaly or attack.		
	e. 'Recover' from incident through incident management and other appropriate recovery		
	mechanisms.		
1(c)	Whether the Cyber Security Policy of Participants has considered the principles prescribed		
	by National Critical Information Infrastructure Protection Centre (NCIIPC) of National		
	Technical Research Organization (NTRO), Government of India (titled 'Guidelines for		
	Protection of National Critical Information Infrastructure') and subsequent revisions, if any,		
	from time to time?		
1(d)	Whether Participant refers to best practices from international standards like ISO 27001,		
	COBIT 5, etc., or their subsequent revisions, if any, from time to time?		



Audit	Description
TOR	
Clause	
1(e)	Whether Participant has designated a senior official or management personnel (henceforth,
	referred to as the "Designated Officer") whose function would be to assess, identify, and
	reduce security and Cyber Security risks, respond to incidents, establish appropriate
	standards and controls, and direct the establishment and implementation of processes and
	procedures as per the Cyber Security Policy?
1(f)	Whether the Board / Partners / Proprietor of the Participant have formed an internal
	Technology Committee comprising of experts?
1(g)	Whether the Participant has established a reporting procedure to facilitate communication
	of unusual activities and events to the Designated Officer in a timely manner?
1(h)	Does the "Technology Committee" along with designated officer reviews the status of
	implementation of Cyber Security & Cyber Resilience Policy on half yearly basis and same
	has been placed before the Board / Partners / Proprietor of the Participant?
1(i)	Does the designated officer and technology committee periodically review instances of
	cyber-attacks, if any, domestically and globally, and take steps to strengthen Cyber Security
	and cyber resilience framework?
1(j)	Whether Participant has defined and documented the responsibilities of its employees,
	outsourced staff, and employees of vendors, members or participants and other entities,
	who may have privileged access or use systems / networks of the Participant towards
	ensuring the goal of Cyber Security?
2	Identification
2(a)	Whether Participant has identified critical assets based on their sensitivity and criticality for
	business operations, services and data management. The critical assets shall include
	business critical systems, internet facing applications /systems, systems that contain
	sensitive data, sensitive personal data, sensitive financial data, Personally Identifiable
	Information (PII) data, etc. All the ancillary systems used for accessing/communicating with
	critical systems either for operations or maintenance shall also be classified as critical
	system.
2 (b)	Whether Participants have approved the list of critical systems from their
	Board/Partners/Proprietor
2(c)	Whether Participants have maintain up-to-date inventory of its hardware and systems,
	software and information assets (internal and external), details of its network resources,
	connections to its network and data flows



Audit	Description
TOR	
Clause	
2(d)	Whether Participant has identified cyber risks (threats and vulnerabilities) that it may face,
	along with the likelihood of such threats and impact on the business and thereby, deploy
	controls commensurate to the criticality?
3	Protection
I	Access Control
3(a)	Any access to Participants' systems, applications, networks, databases, etc., should be for
	a defined purpose andfor a defined period. Whether Participant has granted access to IT
	systems, applications, databases and networks on a need-to-use basis and based on the
	principle of least privilege and has been granted for the period when the access is required
	and has been authorized using strong authentication mechanisms?
3(b)	Whether Participant has implemented an access policy which addresses strong password
	controls for users' access to systems, applications, networks and databases? (Illustrative
	examples for this are given in Annexure C of SEBI/HO/MIRSD/CIR/PB/2018/147 dated
	December 03, 2018)
3(c)	Whether all critical systems of the Participant accessible over the internet have two-factor
	security (such as VPNs, Firewall controls etc.)?
3(d)	Whether Participant has ensured that records of user access to critical systems, wherever
	possible, are uniquely identified and logged for audit and review purposes and such logs
	have been maintained and stored in a secure location for a time period not less than two
	(2) years?
3(e)	Whether Participant has deployed controls and security measures to supervise staff with
	elevated system access entitlements (such as admin or privileged users) to Participant's
	critical systems and controls and measures inter- alia includes restricting the number of
	privileged users, periodic review of privileged users' activities, disallow privileged users from
	accessing systems logs in which their activities are being captured, strong controls over
	remote access by privileged users, etc.?
3(f)	Whether employees and outsourced staff such as employees of vendors or service
	providers, who may have been given authorized access to the Participants' critical systems,
	networks and other computer resources, have been subjected to stringent supervision,
	monitoring and access restrictions?



Audit	Description
TOR	
Clause	
3(g)	Whether Participant has formulated an Internet access policy to monitor and regulate the
	use of internet and internet-based services such as social media sites, cloud-based internet
	storage sites, etc. within the Participant's critical IT infrastructure?
3(h)	Whether User Management addresses deactivation of access of privileges of users who are
	leaving the organization or whose access privileges have been withdrawn?
II	Physical Security
3(i)	Whether physical access to the critical systems has been restricted to minimum and only to
	authorized officials and physical access of outsourced staff/visitors are properly supervised
	by ensuring at the minimum that outsourced staff/visitors are accompanied at all times by
	authorized employees?
3(j)	Whether physical access to the critical systems is being revoked immediately, if the same
	is no longer required?
3(k)	Whether Participant has ensured that the perimeter of the critical equipment room, if any,
	are physically secured and monitored by employing physical, human and procedural
	controls such as the use of security guards, CCTVs, card access systems, mantraps,
	bollards, etc. where appropriate?
III	Network Security Management
3(l)	Whether Participant has established baseline standards to facilitate consistent application
	of security configurations to operating systems, databases, network devices and enterprise
	mobile devices within their IT environment and the LAN and wireless networks are secured
	within the Participants' premises with proper access controls?
3(m)	Whether Participant has installed network security devices, such as firewalls, proxy servers,
	intrusion detection and prevention systems (IDS) to protect their IT infrastructure which is
	exposed to the internet, from security exposures originating from internal and external
	sources?
3(n)	Whether adequate controls have been deployed to address virus / malware / ransomware
	attacks. These controls may include host / network / application-based IDS systems,
	customized kernels forLinux, anti-virus and anti-malware software etc.
IV	Data Security
3(o)	Whether critical data has been identified and encrypted in motion and at rest by using strong
	encryption methods? (Illustrative measures in this regard are given in Annexure A and B of
	SEBI circular SEBI/HO/MIRSD/CIR/PB/2018/147 dated December 03, 2018)



Audit	Description
TOR	
Clause	
3(p)	Whether Participants has implemented measures to prevent unauthorized access or
	copying or transmission of data / information held in contractual or fiduciary capacity and
	ensured that confidentiality of information is not compromised during the process of
	exchanging and transferring information with external parties? (Illustrative measures to
	ensure security during transportation of data over the internet are given in Annexure B of
	SEBI circular SEBI/HO/MIRSD/CIR/PB/2018/147 dated December 03, 2018)
3(q)	Whether the information security policy covers use of devices such as mobile phones,
	faxes, photocopiers, scanners, etc., within their critical IT infrastructure, that can be used
	for capturing and transmission of sensitive data? (For instance, defining access policies for
	personnel, and network connectivity for such devices etc.)
3(r)	Whether Participant allows only authorized data storage devices within their IT
	infrastructure through appropriate validation processes?
3(s)	Whether Participant deploys only hardened hardware / software, including replacing default
	passwords with strong passwords and disabling or removing services identified as
	unnecessary for the functioning of the system?
3(t)	Whether open ports on networks and systems which are not in use or that can be potentially
	used for exploitation of data, have been blocked and measures have been taken to secure
	them?
V	Application Security in Customer Facing Applications
3(u)	Whether application security is in place for Customer facing applications offered over the
	Internet such as IBTs (Internet Based Trading applications), portals containing sensitive or
	private information and Back office applications (repository of financial and personal
	information offered by Participants to Customers) as they carry significant attack surfaces
	by virtue of being available publicly over the Internet for mass use?
	(An illustrative list of measures for ensuring security in such applications is provided in
	Annexure C of SEBI circular SEBI/HO/MIRSD/CIR/PB/2018/147 dated December 03, 2018)
VI	Certification of off-the-shelf products
3(v)	Whether Participant has ensured that off the shelf products being used for core business
	functionality (such as Back office applications) bears Indian Common criteria certification of
	Evaluation Assurance Level 4 which is being provided by Standardisation Testing and
	Quality Certification (STQC) (Ministry of Electronics and Information Technology)(except
	Custom developed / in-house software and components need not obtain the certification,



Audit	Description
TOR	
Clause	
	but have to undergo intensive regression testing, configuration testing etc. The scope of
	tests should include business logic and security controls)?
VII	Patch Management
3(w)	Whether Participants has established and ensure that the patch management procedures
	includes the identification, categorization and prioritization of patches and updates and the
	implementation timeframe for each category of patches has been established to apply them
	in a timely manner?
3(x)	Whether Participant has performed rigorous testing of security patches and updates, where
	possible, before deployment into the production environment so as to ensure that the
	application of patches do not impact other systems?
VIII	Disposal of data, systems and storage Devices
3(y)	Whether Participant has framed suitable policy for disposal of storage media and systems
	and the critical data / Information on such devices and systems has been removed by using
	methods such as crypto shredding/degauss/ Physical destruction as applicable?
3(z)	Whether Participant has formulated a data-disposal and data- retention policy to identify the
	value and lifetime of various parcels of data?
IX	Vulnerability Assessment and Penetration Testing (VAPT)
3(aa)	Whether Participant conduct periodic Vulnerability Assessment and Penetration Tests
	(VAPT) at least once in a financial year which inter-alia include critical assets and
	infrastructure components like Servers, Networking systems, Security devices, load
	balancers, other IT systems pertaining to the activities done as Participants etc., in order to
	detect security vulnerabilities in the IT environment and in-depth evaluation of the security
	posture of the system through simulations of actual attacks on its systems and networks.
3(ab)	Whether Participants have engaged CERT-In empanelled organizations for conducting
	VAPT and submitted final report of VAPT to Depository after approval from Technology
	Committee of Participants, within 1 month of completion of VAPT activity
3(ac)	Whether Participants have performed vulnerability scanning and conduct penetration
	testing prior to the commissioning of a new system which is a critical system or part of an
	existing critical system.



Audit	Description
TOR	
Clause	
3(ad)	Whether Participants have remedied all findings of VAPT on immediate basis and
	compliance of closure of findings of VAPT submitted to Depository within 3 months post the
	submission of final VAPT report.
3(ae)	In case of vulnerabilities discovered in off- the-shelf products (used for core business) or
	applications provided by vendors, whether Participant has reported them to the vendors
	and CDSL in a timely manner?
4	Monitoring and Detection
4(a)	Whether Participant has established appropriate security monitoring systems and
	processes to facilitate continuous monitoring of security events / alerts and timely detection
	of unauthorised or malicious activities, unauthorised changes, unauthorised access and
	unauthorised copying or transmission of data / information held in contractual or fiduciary
	capacity, by internal and external parties and the security logs of systems, applications and
	network devices exposed to the internet has been monitored for anomalies?
4(b)	Further, to ensure high resilience, high availability and timely detection of attacks on
	systems and networks exposed to the internet, whether Participant has implemented
	suitable mechanisms to monitor capacity utilization of its critical systems and networks that
	are exposed to the internet, for example, controls such as firewalls to monitor bandwidth
	usage?
5	Response and Recovery
5(a)	Whether alerts generated from monitoring and detection systems have been suitably
	investigated in order to determine activities that are to be performed to prevent expansion
	of such incident of cyber attack or breach, mitigate its effect and eradicate the incident?
5(b)	Whether the response and recovery plan of the Participant includes plans for the timely
	restoration of systems affected by incidents of cyber-attacks or breaches, for instance,
	offering alternate services or systems to Customers and has same Recovery Time
	Objective (RTO) and Recovery Point Objective (RPO) as specified by SEBI for Market
	Infrastructure Institutions vide SEBI circular CIR/MRD/DMS/17/20 dated June 22, 2012as
	amended from time to time?
5(c)	Whether the response plan defines responsibilities and actions to be performed by its
	employees and support / outsourced staff in the event of cyber-attacks or breach of Cyber
	Security mechanism?



Audit	Description
TOR	
Clause	
5(d)	Whether any incident of loss or destruction of data or systems have been thoroughly
	analysed and lessons learned from such incidents have been incorporated to strengthen
	the security mechanism and improve recovery planning and processes?
5(e)	Whether Participant has conducted suitable periodic drills to test the adequacy and
	effectiveness of the aforementioned response and recovery plan?
6	Sharing of Information
6(a)	Whether quarterly reports containing information on cyber-attacks and threats experienced
	by Participant and measures taken to mitigate vulnerabilities, threats and attacks including
	information on bugs/ vulnerabilities / threats that may be useful for other Participants have
	been submitted to CDSL?
7	Training and Education
7(a)	Whether Participant has worked on building Cyber Security and basic system hygiene
	awareness of staff (with a focus on staff from non-technical disciplines)?
7(b)	Whether Participant has conducted periodic training programs to enhance knowledge of IT
	/ Cyber Security Policy and standards among the employees incorporating up-to-date Cyber
	Security threat alerts and where possible, has extended to outsourced staff, vendors etc.?
7(c)	Whether the training programs have been reviewed and updated to ensure that the contents
	of the program remain current and relevant?
8	Systems managed by vendors
8(a)	Where the systems (IBT, Back office and other Customer facing applications, IT
	infrastructure, etc.) of Participant are managed by vendors and the Participant is unable to
	implement some of the aforementioned guidelines directly, whether the Participant has
	instructed the vendors to adhere to the applicable guidelines in the Cyber Security and
	Cyber Resilience policy and obtain the necessary self-certifications from them to ensure
	compliance with the policy guidelines?
9	AI/ML
9(a)	Are adequate safeguards in place to prevent abnormal behaviour of the AI or ML application
	/ System?
9(b)	Has Participant reported details of AI/ML to Depository on a quarterly basis in accordance
	with SEBI circular SEBI/HO/MI RSD/DOS2/ CIR/P/2019/ 10 dated January 04, 2019?
9(c)	Whether AI / ML systems comply for all above System Audit Checklist points. In case of any
	observation, please report?



Audit	Description
TOR	
Clause	
10	Additional Information about Participant
10(a)	Whether any other deviation/non- compliance observed by auditor which is not specifically covered above?
10(b)	Whether any deviation/non- compliance observed during last audit?
10(c)	Status of compliance for deviations observed during last audit
11	Data Leakage
11 (a)	Whether Participants have approved Data Leakage Policy?
11 (b)	Whether Participants have approved Data Leakage Solution?
11 (c)	Whether Participants have exception reporting and escalation mechanism in case of data breaches / data leaks?
11 (d)	Whether Participants have reported incidents related to data breaches / data leaks in timely manner to CERT-IN, SEBI and CDSL?



Annexure II

### FOR AUDITOR

Step 1- Log in Into Audit application by using the below link:-

https://auditweb.cdslindia.com/Login.aspx

- Now Sign in using 'Login Type-CISA\_Auditor'.
- Now enter User ID & Password and click on "Sign In" button.

4		Ository Services (India) Lim	ited
	Audi	T APPLICATION	
		SIGN IN	
	🟫 Login Type	Select	
	So User ID	Select Auditor	
	Password	DP RTA CDSL_Staff Designated Officer CISA Availtor Auction Committee Bidding Participant IS_Auditor	
		Sign In	
	Forgot password	Registration for DP / RTA	
Gradel	1 © 2010 Audit T Co	Recolution Personal Statistics (Pedict 1 and 141 of s	
Copyright	t © 2019 - Audit Team, Cen	tral Depository Services (India) Ltd. All rig	its reserved.

<u>Step 2</u>- Select "Cyber Security Annual Report" in the 'Select Audit Type' tab as highlighted below.

CDSL : your deposit	ory
KEYWORD: Audit	



	Central Depository Services (India) Limited
	Audit Application
Reports	
Select Audit Type	Select v
Select Audit Month	Select CYBER MULTIPLE INCIDENT REPORT CYBER ARTIFICIAL INTELLIGENCE AND MACHINE LEARNING REPORT
Select DP / RTA	CYBER INCIDENT REPORT CYBER SECURITY ANNUAL REPORT
	IMPLEMENTATION OF CYBER SECURITY AND CYBER RESILIENCE FRAMEWORK VAPT REPORT SYSTEM AUDIT REPORT

Step 3- Select the Year for which the report is to be submitted,

#### a. Select "March 2024" in "Audit Month"

• Centra	l Depository Services (India) Limited Convenient * Dependable * Secure	
	AUDIT APPLICATION	
Reports		
Select Audit Type	CYBER SECURITY ANNUAL REPORT	v
Select Audit Month	Select	~
Select DP / RTA	Select March-2021 March-2022 March-2023 March-2024	

Step 4- Select the DP ID and DP Name in the 'Select DP / RTA' tab and click on 'Confirm'

<u>Step 5-</u> The below screen will be presented once the user is logged in:



		<b>)</b> Ce	entral De	converient * Dependable * Se			Welcom
		-		Audit Application			Welcom
CYBER SECURITY AN	INUAL REPORT						
Audit Type	CYBER SECURITY ANNUAL R	EPORT	DP Nam	e(ID)			
Period							
Schedule No			DP ID				
Cyber Annual Repor	t covers the following Branch D	PIDs :-					
Number of Findings/Observatio	h High Medium	<b>Low</b>					
1. Governance							
Auditor Checkpo Clause	int Description	Compli Status	ance	Management Comments	Description of Findings/ Observations/Reason why the TOR Clause is not applicable to	Target Closure Date (dd/mm/yyyy)	Severity Finding

Step 6- The auditor shall mention the number of findings/ observation for each of risk.

	4	• Central D	epository Services ( Convenient * Dependable * Se			🟠 🔒
			AUDIT APPLICATION			
CYBER SECURITY ANN	UAL REPORT					
Audit Type	CYBER SECURITY ANNUAL RE	PORT DP Na	me(ID)			
Period						
Schedule No		DP ID				
Cyber Annual Report of Number of Findings/Observation	High Medium	Low				
1. GOVERNANCE						
Auditor Checkpoin Clause	t Description	Compliance Status	Management Comments	Description of Findings/ Observations/Reason why the TOR Clause is not applicable to the DP	Target Closure Date (dd/mm/yyyy)	Severity Finding
		Copyright © 2019 - Audit	Team, Central Depository Services (India)			

CDSL : your depository Keyword : Audit



**<u>Step 7</u>-** The auditor has been given access to fill the below mentioned fields.

- a. Compliance Status The Auditor shall mention whether the DP is complying with the said checkpoint or not. The options which Auditor can select are Complied, Not Complied and NA(in case the checkpoint is not applicable to the DP).
- b. Description of Findings/ Observations/Reason why the TOR Clause is not applicable to the DP – The Auditor shall mention his observations in case the DP has not complied with the Checkpoint/ the reason why the said checkpoint is Not Applicable to the DP. In case the DP is complying with the said checkpoint, then the auditor shall mention 'Not Applicable' in the said section.
- c. **Severity Finding –** The Auditor shall mention the Severity of the observation i.e. High, Medium or Low

Step 8- Once the form is filled, the auditor shall click on 'Save'

If any **error** is faced while uploading the report/declaration/submitting the form, request you to send an email to the below email addresses **along with the screenshot of the error**.

- 1. dpinfosec@cdslindia.com
- 2. <u>helpdesk@cdslindia.com</u>



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Annexure III

#### FOR DESIGNATED OFFICER

Step 1- Log in Into Audit application by using the below link:-

https://auditweb.cdslindia.com/Login.aspx

- Now Sign in using 'Login Type-Designated officer'.
  - Now enter User ID & Password and click on "Sign In" button.

- Central De	epository Services (India) Limited
Au	DIT APPLICATION
	SIGN IN
🦚 Login Type	Designated Officer
🔊 User ID	Select Auditor DP
Password	RTA CDSL_Staff Designated Officer CTSA_Auditor Auction Committee Bidding Participant IS_Auditor
	Sign In
Forgot password	t Registration for DP / RTA
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<u>Step 2</u>- Select "Cyber Security Annual Report" in the 'Select Audit Type' tab as highlighted below.

ရှိသ	Central Depository Services (India) Limited
	AUDIT APPLICATION
Reports	
Select Audit Type	Select v
Select Audit Month	Select CYBER MULTIPLE INCIDENT REPORT CYBER ARTIFICIAL INTELLIGENCE AND MACHINE LEARNING REPORT
Select DP / RTA	CYBER INCIDENT REPORT CYBER SECURITY ANNUAL REPORT IMPLEMENTATION OF CYBER SECURITY AND CYBER RESILIENCE FRAMEWORK
	VAPT REPORT SYSTEM AUDIT REPORT
	View Cyber Report VAPT Compliance VAPT Resubmission
	Cyber Audit Compliance Report Cyber RCA Report
	System Audit Compliance Report
	Go to Login   Change Password
FAQ	

Step 3- Select the Year for which the report is to be submitted,

a. Select "March 2024" in "Audit Month"

	Centra	Depository Services (India) Limited	
		AUDIT APPLICATION	
Repo	rts		
Selec	t Audit Type	CYBER SECURITY ANNUAL REPORT	~
Selec	t Audit Month	Select	~
Selec	t DP / RTA	Select March-2021 March-2022 March-2023	
		March-2024	_
		View Cyber Report VAPT Compliance VAPT Resubmission Cyber Audit Compliance Report Cyber RCA Report	
		System Audit Compliance Report	
		Go to Login   Change Password	
FAQ			
	Copyright © 2019 - Audit T	Team, Central Depository Services (India) Ltd. All rights reserved.	

Step 4- Select the DP ID and DP Name in the 'Select DP / RTA' tab and click on 'Confirm'

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KEYWORD :	Audit



**COMMUNIQUÉ TO DEPOSITORY PARTICIPANTS** 

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			AUDIT APPLICATION				
CYBER SEC	CYBER SECURITY ANNUAL REPORT						
Audit Ty	/pe CYBER SECURITY ANNUAL I	REPORT	ime(ID)				
Period							
Schedul	e No	DP ID					
Cyber Ann	ual Report covers the following Branch	DPIDs :-					
1. Gove	RNANCE						
<u>1. Gove</u> Auditor Clause	RNANCE Checkpoint Description	Compliance Status	Management Comments	Description of Findings/ Observations/Reason why the TOR Clause is not applicable to the DP	Target Closure Date (dd/mm/yyyy)	Severity Finding	
Auditor		Status NOT COMPLIED		Observations/Reason why the TOR Clause is not applicable to			

**<u>Step 5</u>**- The below screen will be presented once the user is logged in:

### Step 6- The 'Designated Officer' is given access to fill only the below mentioned fields:

a. Management Comments

#### b. Target Closure Date (dd/mm/yyyy)

Hence, once the CISA Auditor has provided his observations, the Designated Officer of the DP Shall login and fill the abovementioned columns. Illustrative Scenarios have been described below for clarity.

- <u>Scenario 1:</u> If the auditor has provided 'Not Complied' Compliance Status for any of the checkpoints, then the DP shall mention, the reason why it has not complied in the 'Management Comments' section and provide the Target Closure date for rectifying/complying with the observation in the Target Closure Date (dd/mm/yyyy) section.
- <u>Scenario 2:</u> If the auditor has provided 'NA' Compliance Status for any of the checkpoints, then the DP shall mention, the reason why it is Not Applicable in the 'Management Comments' section and mention 30/09/2024 in the Target Closure Date (dd/mm/yyyy) section.
- <u>Scenario 3:</u> If the auditor has provided 'Complied' Compliance Status for any of the checkpoints, then the DP shall mention, 'Not Applicable' in the 'Management Comments' section and mention 30/09/2024 in the Target Closure Date (dd/mm/yyyy) section.



<u>Step 7</u>- The DP shall follow Step 6 for all the Checkpoints.

<u>Step 8-</u> Under '<u>Attach File - Declaration from the MD/ CEO/ Partners/ Proprietor Certifying</u> <u>Compliance</u>' under the 'Audit Findings and Compliance Declaration' section, the DP shall upload the declaration as required under SEBI Circular SEBI/HO/MIRSD/TPD/P/CIR/2022/80 dated June 07, 2022, from the MD/ CEO/ Partners/ Proprietors of the DP certifying compliance with all SEBI Circulars and advisories related to Cyber security issued from time to time (Screenshot below).

AUDIT	FINDINGS AND COMPLIANCE DECLARAT	ION	
Sr. No	Type of Findings	Count	
1	Non- conformity (Major)		
2	Non- conformity (Minor)		
3	Observations		
4	Opportunity for improvement		
Attach	File - Declaration from the MD/ CEO/ I	Partners/ Proprietor	Certifying Compliance
Choos	e File Nefile chosen	pload	
ttach Fi	le la		
	File No file chosen	oad	

<u>Step 9-</u> Under '<u>Attach File</u>' section at the end of the page the DP shall upload the physical copy of the report wherein the checkpoints mentioned in the Communique are clearly stated and the Auditor's observations and Management Comments and the Target Closure date are clearly mentioned.

Furthermore, the Audit report shall be on the letterhead of the Auditor and shall also be signed and stamped. It shall also contain the membership number of the auditor from the relevant authority and the expiration date of the membership number.



4. MONITORING AND DETECTION
5. Response and Recovery
6. Sharing of Information
7. Training and Education
8. Systems managed by vendors
9.AI/ML
10. Additional Information about Participant
11. Data Leakage
Audit Findings and Compliance Declaration
Attach File
Choose File Interchosen Upload 38
Save Submit to CDSL
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<u>Step 10-</u> Once the form is filled and the declaration and the report is uploaded, the DP shall click on 'Submit to CDSL'

If any **error** is faced while uploading the report/declaration/submitting the form, request you to send an email to the below email addresses **along with the screenshot of the error**.

- 1. dpinfosec@cdslindia.com
- 2. <u>helpdesk@cdslindia.com</u>