



With reference to the e-mails of SEBI dated 27th Sept, 30th Sept & 9th Oct'24

1. Offsite data inspection data for the quarter July to September'24 is due by **15th October 2024**.
2. The Portfolio Managers who have already submitted PM Master for July and August'24 before the mail was issued by SEBI, **need not** resubmit those reports.
 - Submitting the September'24 file in the revised format will suffice.
3. It is observed that Portfolio Managers are reporting **listed equity data** also in the Client Holding report despite multiple clarifications issued in this regard.
 - Portfolio Managers are required to submit Clients Holding **excluding** the listed equity.
4. Some Portfolio Managers are **reporting deposits held with banks/clearing members as unlisted debt** in Client Holding report.
 - Please note that such deposits are to be reported as:
 - i. Investment Type **“Other”** and
 - ii. Asset Type as **“Cash”**.
5. A mandatory field for the **date of joining of the Principal Officer** has been added in the PM Master Report.
 - Portfolio Managers shall submit the- Date of Appointment of the Principal Officer as **Principal Officer in PM_PO_DOJ**.
6. **Negative values** have now been allowed in the Net-Worth details.
7. For ease, a **‘Nil Report’ checkbox** has been provided on the upload page for NIL reporting of all reports, except PM Master.
 - Please note that the Nil Reports must be submitted using this checkbox.
 - If an XML file with nil data is uploaded, it will be rejected.
8. For **reducing the re-submission requests** on account of cross validations- please note that, all Client related reports for a particular month shall be processed as a single batch.
 - If one report has error/s, all other client reports will be marked as “Error” and need to be re-uploaded.
9. For the offsite data submission for the period **July-Sep'2024**, STT and other statutory levies may be reported as Expense Type – “Operating Fees” and Expense_Sub_Type - “Other Miscellaneous Expense” in the Client Expense Master report.
 - However, for the inspection period **Oct-Dec'2024 onwards**, a separate Expense_Sub_Type – “Statutory Levies” will be allowed under Expense Type – “Operating Fees”, and all statutory levies may be reported under this head.



10. For the inspection period **Oct-Dec'2024 onwards**, Exit Load in the Client_Cap_Transactions shall be reported as amount (in INR) and not as percentage.
11. For the inspection period **Oct-Dec'2024 onwards**, while reporting for offsite surveillance:
- w.r.t. Dividend Receivable may be reported at Gross Value on Ex-Date in Client Holding and AUM.
 - On realization, TDS amount on such dividend may be reported as Tax Liability (outflow) in Client Transaction report and Net Dividend received will be the part of the Holding and AUM.
 - Further, w.r.t. TDS on LTCG for NRI clients, on realization of Capital Gain, TDS amount may be reported as Tax Liability (outflow) in Client Transaction report and Net Value may be reported in Holding and AUM.

-----END-----