

Circular No.: NSDL/POLICY/2026/0137

September 21, 2026

Subject: Compliance Guidelines for Digital Accessibility Circular - 'Rights of Persons with Disabilities Act, 2016 and rules made thereunder mandatory compliance by all Regulated Entities'

Attention of Depository Participants (DP) is invited to NSDL circular no. NSDL/POLICY/2025/0129 dated September 29, 2025 (ref: SEBI circular no. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/131 dated September 25, 2025), regarding Compliance Guidelines for Digital Accessibility Circular 'Rights of Persons with Disabilities Act, 2016 and rules made thereunder- mandatory compliance by all Regulated Entities' dated July 31, 2025. Further, NSDL Circular no. NSDL/POLICY/2026/0109 dated August 03, 2026 (ref: SEBI circular no. HO/(411)2026-ITD-5_DIV2/I/17922/2026 dated July 31, 2026) was issued regarding Extension of timelines with respect to compliance of Digital Accessibility Circulars.

Based on the representations received from DPs and to facilitate uniform implementation of the aforesaid SEBI Circulars and in consultation with SEBI, it is clarified that all Digital Platforms of DPs shall be subject to an Accessibility Audit conducted by an IAAP-certified accessibility professional in accordance with the applicable SEBI Circulars.

1. For investor facing digital platforms (such as e.g., front office demat solutions, back-office access given to clients, investors, e-KYC products, mobile/internet applications) that are being used to conduct operations in the capacity of a DP, and where no customization impacting the accessibility characteristics of the platform/application has been carried out, the DPs may coordinate with the respective platform/application vendors to obtain the requisite Accessibility Audit Report/Certificate from an IAAP-certified accessibility professional.

The accessibility audit report for standard digital platforms/applications, conducted by an IAAP-certified professional, along with the closure/non-closure status of audit findings/observations demonstrating compliance with the provisions of the Rights of Persons with Disabilities Act, 2016, can be submitted by DPs for compliance with the aforesaid SEBI and NSDL circular.

In such cases, the vendor shall provide a covering letter addressed to the concerned DP specifying the details of the Digital Platform (including version number, wherever applicable), the



details of the IAAP-certified accessibility professional who conducted the audit and a copy of the Accessibility Audit Report issued in the name of the vendor.

Further, a checkpoint shall be incorporated in the Standardized Terms of Reference of System Audit, wherever applicable, for validation and confirmation by the System Auditor that the IAAP Accessibility Audit Certificate submitted by the DP for vendor-provided software/applications pertains to the standard version of the platform/application and that no customization, as referred to above, has been carried out where the DP has relied upon a vendor-provided Accessibility Audit Certificate.

2. For digital platforms/ applications unique/customized to a regulated DP, including its website, mobile / web applications, web portals, online account opening platforms, KYC applications, back-office systems access given to clients or other inhouse systems etc., the concerned DP shall continue to undertake an independent Accessibility Audit through an IAAP-certified accessibility professional and ensure related compliance.
3. It is clarified that nothing contained in this Circular shall be construed as imposing any regulatory obligation upon vendors to obtain or provide an Accessibility Audit Report. Any such arrangement shall be governed by the contractual terms agreed upon between the vendor and the concerned DP. Further, a DP may, at its discretion, choose not to rely upon the vendor's Accessibility Audit Report and may instead engage an IAAP-certified accessibility professional of its own choice.
4. It is to be noted that the ultimate responsibility for ensuring compliance with the applicable provisions of the Rights of Persons with Disabilities Act 2016, the rules made thereunder, related SEBI and NSDL digital accessibility Circulars, including implementation of remediation measures and adherence to the prescribed accessibility standards, shall solely vest with the concerned DPs irrespective of whether the Digital Platform has been developed in-house or procured from a third-party vendor.

DPs shall submit the Initial Accessibility Audit report for the digital platform and remediation of findings from the audit i.e Final Accessibility Audit Report for their Digital Platforms to NSDL on or before October 31, 2026



The details regarding the submission format and related requirements are provided in NSDL circular no. NSDL/POLICY/2026/0106 dated July 28, 2026 regarding titled "Submission of the Final Accessibility Audit Report for Digital Platforms". The modalities for submission shall be shared separately.

DPs are requested to take note of the aforesaid compliance requirement and ensure compliance accordingly.

For any information or clarifications in this matter, DPs may contact NSDL at nsdl-bp-inspection@nsdl.com.

**For and on behalf of
National Securities Depository Limited**

**Rakesh Mehta
Vice President**

FORTHCOMING COMPLIANCE			
Particulars	Deadline	Manner of sending	Reference
Investor Grievance Report (Monthly)	By 10 th of the following month	Through e-PASS	Para 22 of 'Grievance Redressal' chapter and Para 27 of 'Internal Controls/Reporting to NSDL/SEBI' chapter of NSDL Master Circular for Participants
Compliance report w.r.t Same Mobile number and/ or email address captured for multiple accounts. (monthly)	Before 27 th of following month	Through Email.	Para 26 of 'Miscellaneous' chapter of NSDL Master Circular for Participants.

