

---

KARVY/OPS/INTERM-1/GENRL/25-223

June 10, 2025

## KRA REGISTRATION OF CLIENTS

1. Attention of SEBI Registered Intermediaries ("SRIs") is drawn to SEBI KRA Regulations2011 as well as SEBI's Master Circular (SEBI/HO/MIRSD/SECFATF/P/CIR/2023/169) dated October 12, 2023 on KYC which stipulates that after doing the initial KYC of the new clients, the SRI shall forthwith upload the KYC information on the system of the KRA within 3 working days from the completion of the KYC process. Further, since 2023, as an enablement step, KRAs and Exchanges / Depositories have been syncing the KYC status of the investors so that KRA provides updated status to the Exchanges / Depositories and they use the same to grant or restrict market access.
2. While this exercise has been going on for new investors, now in order to align the entire investor base, KYC status of older investor records has also been checked between KRAs & Exchanges / Depositories. It has come to light that there are some legacy PANs with MIs, where UCC has been created or Demat account has been opened but Investor record does not exist in KRA system.
3. The list of such PANs has been shared with MIs. SRIs are required to identify such PANs and upload such PANs in KRA system at the earliest so as to avoid any inconvenience to the clients. The data and documents uploaded should be in line with the norms stipulated in the aforementioned Master Circular, to enable validation/registration. SRIs may use any of the currently available modes provided by the KRAs for uploading these records.
4. The list of non-compliant PANs i.e., where KYC record is not uploaded to any of the KRAs would be reported to SEBI regularly by KRAs.

SRIs queries related to this communique may be addressed to [kra@karvydata.com](mailto:kra@karvydata.com) or contact KARVY helpdesk 8121096850 / 8019355102.

Regards

Sd/-

A Phanindra Kumar  
Compliance Officer