

**IMPORTANT- Submission on SEBI Circular dated 31st July' 2025**

1 message

APMI India <apmi@apmiindia.org>  
To: APMI India <apmi@apmiindia.org>  
Bcc: membership@apmiindia.org

Fri, Sep 5, 2025 at 3:23 PM

**To: The Compliance Officers of APMI Members + Compliance Officer of APMI Non-Members + Portfolio Managers not registered with APMI**

Dear All,

Greetings from APMI !

Pursuant to the below two communications from APMI and SEBI Circular dated 31st July'25 & 29th August'25 and the information sessions# conducted by APMI.

- **SEBI Circular dated 31st July'25:** <https://www.apmiindia.org/storagebox/images/Circulars/Rights%20of%20Persons%20with%20Disabilities%20Act,%202016%20-%2031st%20July'25.pdf>
- **SEBI Circular dated 29th August'25:** <https://www.apmiindia.org/storagebox/images/Circulars/Extension%20of%20Timelines%20-%20Digital%20Accessibility%20Circular%20-%2029th%20Aug'25.pdf>
  - In the circular dated 29th August 2025, SEBI granted a **one-month extension** for compliance with the two submissions specified under Point 1 and Point 2 of Table 1.
  - To facilitate the submission process for our Members, APMI, in consultation and guidance by SEBI, has created the following Google Form.
    - **Google Form Link:** [https://docs.google.com/forms/d/1R5oPZpxyUULqBSSFJ9tTx0A8HK0nni3us71Vq7LvI6I/viewform?edit\\_requested=true](https://docs.google.com/forms/d/1R5oPZpxyUULqBSSFJ9tTx0A8HK0nni3us71Vq7LvI6I/viewform?edit_requested=true)

You are hereby requested to submit your responses through the above link by the **revised due date of 30th September 2025**. In case you have already submitted the above, please ignore this email.

We will keep you posted on further developments on this.

Thanks &amp; Warm Regards

**Association of Portfolio Managers in India****Contact us at:** <https://www.apmiindia.org/apmi/contactus.htm>**Disclaimer:** <https://apmiindia.org/storagebox/images/Important/Compliance%20Sutra%20-%20Important%20Disclosures%20to%20Members.pdf>**#Informative sessions conducted by APMI under Compliance Sutra on the above Circular:**

- *First Session: 20th August, 2025- By BFSI Edge- Compliance Consultant.*
- *Second Session: 25th August, 2025- By Saralx- IAAP Certified Auditor*
- *Third Session: 26th August, 2025- By Deque- IAAP Certified Auditor*
- *Fourth Session: 28th August, 2025- By Barrier Break- IAAP Certified Auditor*
- *Fifth Session: 29th August, 2025- By DBA Digital A11Y- IAAP Certified Auditor.*

----- Forwarded message -----

From: **APMI India** <apmi@apmiindia.org>**Date: Thu, Aug 28, 2025 at 6:00 PM**Subject: **IMPORTANT- Submission on SEBI Circular dated 31st July' 2025**

To: APMI India &lt;apmi@apmiindia.org&gt;

**To: The Compliance Officers of APMI Members + Compliance Officer of APMI Non-Members + Portfolio Managers not registered with APMI**

Dear All,

Greetings from APMI !

Pursuant to the below communication and sessions# conducted by APMI to help our members gain clarity on **SEBI Circular dated 31st July'25- Rights of Persons with Disabilities Act, 2016 and rules made thereunder**. Circular for reference: <https://www.apmiindia.org/storagebox/images/Circulars/Rights%20of%20Persons%20with%20Disabilities%20Act,%202016%20-%2031st%20July'25.pdf>

In furtherance of the communication below, and to comply with the two submissions due on 31st August 2025, you are requested to submit your responses using the following Google Form link by the due date:

- [https://docs.google.com/forms/d/1R5oPZpxyUULqBSSFJ9tTx0A8HK0nni3us71Vq7LvI6I/viewform?edit\\_requested=true](https://docs.google.com/forms/d/1R5oPZpxyUULqBSSFJ9tTx0A8HK0nni3us71Vq7LvI6I/viewform?edit_requested=true)

**#Informative sessions conducted by APMI under Compliance Sutra on the above Circular:**

- First Session: 20th August, 2025- By BFSI.
- Second Session: 25th August, 2025- By Saralx.
- Third Session: 26th August, 2025- By Deque.
- Fourth Session: 28th August, 2025- By Barrier Break.
- **Fifth (Upcoming session): 29th August, 2025- By DBA Digital A11Y**

Warm Regards

**Association of Portfolio Managers in India**

Contact us at: <https://www.apmiindia.org/apmi/contactus.htm>

Disclaimer: <https://apmiindia.org/storagebox/images/Important/Compliance%20Sutra%20-%20Important%20Disclosures%20to%20Members.pdf>

----- Forwarded message -----

From: **APMI India** <[apmi@apmiindia.org](mailto:apmi@apmiindia.org)>

**Date: Wed, Aug 13, 2025 at 3:08 PM**

Subject: APMI- Important Communication- Rights of Persons with Disabilities Act, 2016 and rules made thereunder- mandatory compliance by all Regulated Entities.

To: APMI India <[apmi@apmiindia.org](mailto:apmi@apmiindia.org)>

**To: The Compliance Officers of APMI Members.**

Dear All,

Greetings from APMI !

This is in reference to **SEBI Circular dated 31st July'25- Rights of Persons with Disabilities Act, 2016 and rules made thereunder- mandatory compliance by all Regulated Entities**. This move follows the **Supreme Court judgement dated April 30, 2025** affirming that **digital access is a fundamental right** and aims to build an inclusive digital ecosystem in the Indian securities market.

Pursuant to Rights of Persons with Disabilities Act, 2016 ("RPwD Act, 2016") and the subsequent circular, SEBI emphasized on the importance of protecting the rights and dignity of persons with disabilities and ensuring their full and effective participation in securities market, enabling them to access digital platforms of SEBI Regulated Entities.

The mentioned circular is applicable to all Regulated Entities (REs) regulated by SEBI and it is mandated that all Digital Platforms of REs shall be compliant with the provisions of the Rights of Persons with Disabilities Act, 2016 ("RPwD Act, 2016") and corresponding rules.

**Circular reference:**

- <https://www.apmiindia.org/storagebox/images/Circulars/Rights%20of%20Persons%20with%20Disabilities%20Act,%202016%20-%2031st%20July'25.pdf>

**Key Takeaways from the Circular:**

1. REs shall provide updates on the status of implementation of this Circular as per the below timeline:

| Sr.No. | Circular Requirement   | Milestone                                 | Due Date (from 31 <sup>st</sup> July'25) | Advisory Deliverable  |
|--------|--|---|--|---|
| 1      | REs shall submit a list of digital platforms provided by them to Investors | Within 1 month from issuance of Circular  | 31 <sup>st</sup> Aug'25                  | Gap assessment, list preparation.                                 |
| 2      | REs shall submit a Compliance/Action taken report                          | Within 1 month from issuance of Circular  | 31 <sup>st</sup> Aug'25                  | Compliance/Action taken report                                    |
| 3      | Appointment of IAAP certified accessibility professionals as Auditors      | Within 45 days from issuance of Circular  | 14 <sup>th</sup> Sept'25                 | Identification and appointment of Auditor                         |
| 4      | Conduct of accessibility audit for digital platforms                       | Within 3 months from issuance of Circular | 30 <sup>th</sup> Oct'25                  | Support in audit process  |
| 5      | Remediation of findings from audit and ensuring compliance                 | Within 6 months from issuance of Circular | 31 <sup>st</sup> Jan'26                  | Implement recommendations, ensure readiness for SEBI verification |
| 6      | Submit Compliance Report within 30 days from the end of Financial Year     | Annual                                    | 30 <sup>th</sup> April every year        | Annual audit review and submission report                         |

**2. List of empanelled Web Accessibility Auditors by Government of India-**

<https://www.apmiindia.org/storagebox/images/Circulars/List%20of%20Empanelled%20Web%20Accessibility%20Auditors%20-%20204th%20Feb'25.pdf>

For a better understanding of the above-mentioned SEBI Circular and its relevant compliance requirements, APMI will be conducting a session under our initiative **Compliance Sutra**, in the next week and an email with session details will be shared separately.

Request you to take a note of the same and initiate necessary action.

Warm Regards

**Association of Portfolio Managers in India**

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