

L/ENF/DU-291/IR/2024-2025/442

June 24, 2024

To,
Compliance Officer and Designated Directors
Sunidhi Securities & Finance Ltd (Clg.no.291)
KALPATARU INSPIRE, UNIT 1, 8TH FLOOR,
OPP. GRAND HYATT HOTEL,
SANTACRUZ (EAST),
MUMBAI-400055

Dear Sir /Madam,

Sub: Final letter pertaining to Inspection conducted by the Exchange in FY 2024-25

Please refer to **Annexure A** to this letter with the details of non-compliances observed by the Exchange after taking into consideration the clarifications offered by you.

You are advised to take necessary steps to ensure that such non-compliances do not recur.


Please note that in case similar non-compliances are observed during a subsequent inspection by the Exchange, applicable action including an escalated penalty may be imposed pursuant to the Exchange Notice No. 20180214 - 31 dated February 14, 2018.

Further, you are requested to submit a compliance certificate, from your Compliance Officer within 10 days from the receipt of this letter stating that all the recommendations made above have been implemented. Failure to furnish the compliance certificate within the timelines or submission of an incorrect compliance certificate (in case similar observations are observed by the Exchange or your internal auditor, etc. post the submission of the compliance certificate) may result in further action being initiated by the Exchange.

You are also required to place the letter before your Board for necessary action and the letter is to be taken into consideration by your Board for the performance appraisal of the concerned individual who is responsible for the lapse/ deficiency.

We thank you for your co-operation during the inspection.

Yours faithfully,



Vandana Vania
Asst. General Manager
(Enforcement)



Dnyaneshwar Ugalmugale
Asst. Manager
(Enforcement)

Annexure A

Name of the Member	Sunidhi Securities & Finance Ltd
Clearing Number	291
Inspection Year	F.Y. 2023 – 2024
Date of First Letter	02-02-2023
Date of Response to First Letter	20-02-2024.

a) Details of Non-Compliance observed after considering the responses provided, where no monetary penalty is applicable:

Sr. No.	Violation	Notice / Regulatory Requirement	Action
1.	Non reconciliation of the Exchange UCC database and Back-office database of the Member.	20140801-19 dated August 1, 2014, 20140811-25 dated August 11, 2014 and 20140819-17 dated August 19, 2014 and 20160927-41 dated September 27, 2016, 20161020-17 dated October 20, 2016	You are advised to ensure that your own back-office and Exchange UCC database is updated at all times.
2.	Non settlement of client account / Unmoved creditors.	20091204-7 dated December 04, 2009, 20160927-41 dated September 27, 2016, 20210616-41 dated June 16, 2021, 20210831-40 dated August 31, 2021, 20220331-53 dated March 31, 2022, 20220727-48 dated July 27, 2022	You are advised to ensure compliance with the requirements for settlement of clients' funds.
3.	Incorrect submission of Holding statement to Exchange	20160927-41 dated September 27, 2016 20200731-25 dated July 31, 2020 20200930-66 dated September 30, 2020 20201217-54 dated December 17, 2020 20210118-31 dated January 18, 2021 20210927-48 dated September 27, 2021 0220903-1 dated September 03, 2022 20230113-13 dated January 13, 2023	You are advised to ensure to reconciliation of securities.

Details of observations closed after considering the responses provided: -

- Incorrect reporting of Margin collection.
- Submission of incorrect data to the Exchange under Enhanced Supervision – Cash and cash equivalent.
- Assigning same mobile Number and Email id to multiple clients.
- Nomenclature of Bank accounts is not in standardized format as specified by the Regulators.

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