

L/ENF/SS-935/IR/2024-2025/410

June 19, 2024

To,
Compliance Officer and Designated Director
Samco Securities Ltd (Clg. No. 935)
1004, A Wing, Naman Midtown,
10th Floor, Senapati Bapat Marg,
Prabhadevi (West)
Mumbai-400013

Dear Sir /Madam,

Sub: Final letter pertaining to Inspection conducted by the Exchange in FY 2023-24

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. Gen Manager
(Enforcement)



Sandhya Sapaliga
Associate Manager
(Enforcement)

Annexure A

Name of the Member	Samco Securities Ltd
Clearing Number	935
Inspection Year	F.Y. 2023 – 2024
Date of First Letter	February 23, 2024
Date of Response to First Letter	March 01, 2024 & June 12 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.	There were no clear remarks showing PAN of clients was verified with Income Tax website on the scanned KYC images	SEBI/HO/CDMRD/DMP/CIR/P/2016/87 dated September 16, 2016 and SEBI/HO/CDMRD/DNP/CIR/P/2021/30 dated March 08, 2021 20230626-1 dated June 26, 2023, 20230518-1 dated May 18 2023	You are advised to ensure that correct and clear remarks are mentioned wherever the PAN is verified from the income tax website
2.	Incorrect Email IDs and Mobile Numbers of clients are uploaded in UCC database	20140801-19 dated August 1, 2014, 20140811-25 dated August 11, 2014, 20140819-17 dated August 19, 2014 September 26, 2016 20160927-41 dated September 27, 2016,0020 20161020-17 dated October 20, 2016	You are advised to ensure that correct email ids and mobile numbers are updated in the Exchange UCC database and update Exchange UCC database on a continuous basis in case of any change
3.	Non settlement of Clients' accounts	20210809-50 dated August 9, 2021, 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 settlement of clients' accounts

Details of observations closed after considering the responses provided

- Non reconciliation of Securities

