

Dear Shareholders,

**Subject: Update on Simplified norms for processing investor's service requests by RTAs and norms for furnishing PAN, KYC details and Nomination**

Securities and Exchange Board of India (SEBI) vide its Circular dated November 17, 2023 has amended para 19.2 (Freezing of Folios without PAN, KYC details and Nomination) of SEBI's Master Circular for Registrars to an Issue and Share Transfer Agents dated May 17, 2023 and deleted the provisions of freezing of folios and referring frozen folios to the administering authority under the Benami Transactions (Prohibitions) Act, 1988 and/or Prevention of Money Laundering Act, 2002 for cases where KYC details have not been provided by the shareholders.

A copy of aforesaid SEBI Circular dated November 17, 2023, is annexed herewith.

In case of query, please reach out to our Registrar and Share Transfer Agent Maheshwari Datamatics Pvt. Ltd., 23 R N Mukherjee Road, 5th Floor, Kolkata 700001 E-mail [mdpldc@yahoo.com](mailto:mdpldc@yahoo.com)

Yours Faithfully,

For **Gillanders Arbuthnot and Company Limited**

**Rajat Arora**  
**Company Secretary**

**CIRCULAR**

**SEBI/HO/MIRSD/POD-1/P/CIR/2023/181**

**November 17, 2023**

**To**

**All registered Registrars to an Issue and Share Transfer Agents (RTAs)  
All Listed Companies through Recognized Stock Exchanges  
Recognized Stock Exchanges  
All Recognized Depositories  
Depository Participants through Depositories**

Dear Sir / Madam,

**Simplified norms for processing investor's service requests by RTAs and norms for furnishing PAN, KYC details and Nomination**

1. SEBI, vide circular no. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2023/37 dated March 16, 2023 (*now rescinded due to issuance of Master Circular for Registrars to an Issue and Share Transfer Agents dated May 17, 2023*) had simplified norms for processing investor's service request by RTAs and for furnishing PAN, KYC details and Nomination.
2. Based on representations received from the Registrars' Association of India, feedback from investors, and to mitigate unintended challenges on account of freezing of folios and referring frozen folios to the administering authority under the Benami Transactions (Prohibitions) Act, 1988 and/or Prevention of Money Laundering Act, 2002, it has been decided to do away with the above provisions. Accordingly, para 19.2 of the Master Circular for Registrars to an Issue and Share Transfer Agents dated May 17, 2023 has been amended as follows:
  - 2.1. Reference to the term 'freezing/ frozen' has been deleted.
  - 2.2. Referral of folios by the RTA/listed company to the administering authority under the Benami Transactions (Prohibitions) Act, 1988 and/or Prevention of Money Laundering Act, 2002, has been done away with.
3. Stock Exchanges, Depositories, RTAs and listed companies are advised to:
  - 3.1. comply with the conditions laid down in this circular;
  - 3.2. make necessary amendments to the relevant bye-laws, rules and regulations, operational instructions, as the case may be, for the implementation of the above circular; and

- 3.3. bring the provisions of this circular to the notice of their constituents and also disseminate the same on the website.
- 3.4. communicate and create awareness amongst stakeholders.
4. This circular shall come into force with immediate effect.
5. This circular is issued in exercise of powers conferred by Section 11(1) of the Securities and Exchange Board of India Act, 1992 to protect the interests of investors in securities and to promote the development of, and to regulate the securities market.
6. This circular is available on SEBI website at [www.sebi.gov.in](http://www.sebi.gov.in) under the categories "Legal Framework -> Circulars".

Yours faithfully,

**Aradhana Verma**  
**General Manager**  
**Market Intermediaries Regulation and Supervision Department**  
**Tel. No. 022-2644 9633**  
Email id - [aradhanad@sebi.gov.in](mailto:aradhanad@sebi.gov.in)