



Central Depository Services (India) Limited

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COMMUNIQUE TO DEPOSITORY PARTICIPANTS

CDSL/AUDIT/DP/POLCY/2026/648

September 18, 2026

COMPLIANCE GUIDELINES FOR DIGITAL ACCESSIBILITY CIRCULAR

This is with reference to the below-mentioned SEBI Circulars.

- i. SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/111 dated July 31, 2025, on Rights of Persons with Disabilities Act, 2016 and Rules made thereunder – Mandatory Compliance by all Regulated Entities.
- ii. SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/121 dated August 29, 2025, on Extension of timelines and update of reporting authority in respect of the aforesaid Circular.
- iii. SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/131 dated September 25, 2025, on Compliance Guidelines for Digital Accessibility Circular – Rights of Persons with Disabilities Act, 2016 and Rules made thereunder – Mandatory Compliance by all Regulated Entities.
- iv. SEBI circular no. HO/13/19/13(2)2025-ITD-1_VIAP/I/187/2025 December 08, 2025, on Clarification on the Digital Accessibility circulars of SEBI for format of submitting a status of readiness and compliance to the accessibility requirements for each of their investor facing digital platforms.
- v. SEBI circular no. HO/(411)2026-1TD-5_D1V2/1/17922/2026 on July 31, 2026, on Extension of timelines with respect to compliance of Digital Accessibility Circulars.

Based on the representations received from Depository Participants and to facilitate the uniform implementation of the aforesaid SEBI Circulars and in consultation with SEBI, it is clarified that all Digital Platforms of Depository Participants shall be subject to an Accessibility Audit conducted by an IAAP-certified accessibility professional in accordance with the applicable SEBI Circulars.

1. Standard Digital Platforms/Applications

For investor facing digital platforms (such as e.g., front office demat solutions, back-office access given to clients, investors, e-KYC products mobile/internet applications) that are being used to conduct operations in the capacity of a Depository Participant, and where no customization impacting the accessibility characteristics of the platform/application has been carried out, the Depository Participants may coordinate with the respective platform/application vendors to obtain the requisite Accessibility Audit Report/Certificate from an IAAP-certified accessibility professional.

The Accessibility Audit Report for standard digital platforms/applications, conducted by an IAAP-certified professional, along with the closure/non-closure status of audit findings/observations demonstrating compliance with the provisions of the Rights of



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Persons with Disabilities Act, 2016, can be submitted by Depository Participants for compliance with the aforesaid SEBI and CDSL circulars.

In such cases, the vendor shall provide a covering letter addressed to the concerned Depository Participant specifying the details of the Digital Platform (including version number, wherever applicable), the details of the IAAP-certified accessibility professional who conducted the audit and a copy of the Accessibility Audit Report issued in the name of the vendor.

Further, wherever applicable a checkpoint shall be incorporated in the Standardized Terms of Reference of System Audit for validation and confirmation by the System Auditor that the IAAP Accessibility Audit Certificate submitted by the Depository Participant for vendor-provided software/applications pertains to the standard version of the platform/application and that no customization, as referred to above, has been carried out where the Depository Participant has relied upon a vendor-provided Accessibility Audit Certificate.

2. Unique / Customized Digital Platforms and Applications

For digital platforms/ applications that are unique to or customized for a regulated Depository Participant, including its website, mobile/ web applications, web portals, online account opening platforms, KYC applications, back-office systems providing access to clients or other in-house systems, the concerned Depository Participant shall continue to undertake an independent Accessibility Audit through an IAAP-certified accessibility professional and ensure compliance with the applicable requirements.

3. Responsibility of Vendors

It is clarified that nothing contained in this Circular shall be construed as imposing any regulatory obligation upon vendors to obtain or provide an Accessibility Audit Report. Any such arrangement shall be governed by the contractual terms agreed upon between the vendor and the concerned Depository Participant.

Further, a Depository Participant may, at its discretion, choose not to rely upon the vendor's Accessibility Audit Report and may instead engage an IAAP-certified accessibility professional of its own choice.

- 4.** It is to be noted that the ultimate responsibility for ensuring compliance with the applicable provisions of the Rights of Persons with Disabilities Act, 2016, the Rules made thereunder, related SEBI and CDSL digital accessibility circulars, including implementation of remediation measures and adherence to the prescribed accessibility standards, shall solely vest with the concerned Depository Participants irrespective of whether the Digital Platform has been developed in-house or procured from a third-party vendor.



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Depository Participants shall submit the Initial Accessibility Audit report for the digital platform and Final Accessibility Audit Report reflecting the remediation of findings identified during the audit i.e. for their digital platforms to CDSL on or before October 31, 2026, through <https://auditweb.cdslindia.com>.

The details regarding the submission format and related requirements are provided in Communiqué No. CDSL/AUDIT/DP/POLCY/2026/440 titled "Submission of the Final Accessibility Audit Report for Digital Platforms" dated July 1, 2026.

Depository Participants are advised to take note of the contents of the said communique along with the relevant Communiques issued by CDSL from time to time and ensure compliance.

**For and on behalf of
Central Depository Services (India) Limited**

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**Ajit Prabhu
Sr. Manager - Audit, Inspection & Compliance**