

Format of System Audit Report

(To be on the letter head of the System Auditor)

System Audit Report for the period from April 1, 2012 to March 31, 2013

Date:

Annexure A

Areas of Audit		Auditors Remarks (Supporting Observations, Findings, References & Substantiation)
1 Organization Policies & Procedures		
Description	Yes / No	
Are Policies related to Information Technology &		
Information Security are available, approved by		
management and complied		
Is organization structure & roles and responsibilities		
defined for IT		
Are assets (like application, database, servers, networks		
etc) identified and ownership assigned towards complete		
lifecycle of these assets by management.		
Are operators certified for operating the trading systems		-
Do incident response procedures exists		
Are incidents reported, resolved / closed and analyzed for		
root cause		
Is escalation of incidents done to management and		
government organization as applicable, based on		
criticality, impact and type of incidents		
Do Plans related to business continuity and disaster		
recovery exist		
Are plans related to business continuity and disaster		
recovery tested and records related to test available		



2 Perimeter & Environmental Security	
Description	Yes / No
Are equipment and resources (people, systems, database,	
network and application) are sited in a manner to protect and	
prevent risks from environmental threats & hazards, and	
opportunities for unauthorized access.	
Physical Access to the area is controlled by reliable controls	
and only authorized users have access to these areas and to	
prevent misuse of facility by unauthorized persons	
Logs of access to these areas maintained and reviewed	
Is storage of backup secured commensurate to the risks	
involved and backup stored at a geographically separate	
location from primary	
Contact list for emergency / crisis exists and updated	
3 Access Control	
Representation	
AC_Pro: Access Control Procedure / Process	
AC_Auth: Access Control Authentication	
AC_Pwd: Access Control Password	
Each of the above have specific attributes specified in number.	
Description	Yes / No
AC_Pro1 Is approval and authorization a required process for	
creating user and providing access (physical, system, database,	
application)	
AC_Pro2 Are users created by authorized personnel	
AC_Pro3 Is there track of user id's created, disabled, enabled,	
deleted, unlocked, log of all such events maintained	
AC Pro4 Are passwords (of systems / database / application)	
changed in event of employee / vendor staff leaving the	
company / transfers.	
Member Name: BSE Clearing Number	



AC Pro5 In case of new user / password resets; is password communicated to user securely	
AC Pro6 A process exists to block / suspend the user (id) on request from user (case of loss of device / malicious activity)	
AC_Auth1 Does the system (Application / System / Database) challenges (prompts) all user for authentication	
AC_Auth2 Is the mechanism for authentication strong enough so as to control the threats that may be applicable	
AC_Auth3 Are users uniquely identifiable with a unique user id	
AC_Auth4 Are there generic ids existing for access	
AC_Auth5 Are two factor authentication for login session implemented for all orders emanating using internet protocol.	
AC_Auth6 Is Public Key Infrastructure (PKI) based implementation using digital signatures deployed for authentication, supported by one of the agencies certified by government of India.	
AC_Auth7 Are the two factors in the two factor authentication framework different	
AC_Pwd1 Does System requires changing of password when the user logs in for the first time.	
AC_Pwd2 Are users automatically disabled (Locked) on entering erroneous password on three consecutive occasions	
AC_Pwd3 Does system disable (block/lock) user automatically on expiry of password.	
AC_Pwd 4 Are controls implemented to ensure that password is alphanumeric (preferably with one special character), instead of just being alphabets or just numerical.	
AC_Pwd5 Are controls existing to ensure that the changed password cannot be the same as of the last password	
AC_Pwd6 Are controls existing to ensure that the Login id of the user and password should not be the same.	



AC_Pwd7 Are controls existing to ensure that the Password	
should be of minimum six characters and not more than twelve	
characters.	
AC_Pwd8 Are controls existing to ensure that all password are	
secured by encryption mechanism and that encryption	
mechanism is adequate enough to provide safety from	
applicable risks	
AC_PWD9 System ensures that password is masked at time of	
entry.	
AC_SS Does the system allow only authorized administrative	
users to terminate a user's session.	
4 IT Systems and System Security	
Description	Yes / No
Are systems adequately managed, controlled and secured	LI
Do systems provide security to applications, database and data	
stored (data at rest) adequately using mechanism such as	
encryption	
V 1	
File system:	
	_
All volumes of the server hosting the database and / application	_
has file system that offers enhanced security – For Ex: EFS /	
	-
has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc.	
has file system that offers enhanced security – For Ex: EFS /	
has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing:	
has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing: Default file &directory shares and simple file sharing if offered	-
has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing:	
 has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing: Default file & directory shares and simple file sharing if offered by the operating system are disabled. 	-
 has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing: Default file & directory shares and simple file sharing if offered 	-
 has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing: Default file & directory shares and simple file sharing if offered by the operating system are disabled. 	
 has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing: Default file & directory shares and simple file sharing if offered by the operating system are disabled. Sharing if any is authorized Are guest accounts disabled / hashed out / deleted 	
 has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing: Default file & directory shares and simple file sharing if offered by the operating system are disabled. Sharing if any is authorized Are guest accounts disabled / hashed out / deleted Patches, hot fixes and service packs are updated after 	
 has file system that offers enhanced security – For Ex: EFS / NTFS for windows, Vxfs- for HP Unix, ext3 for Linux etc. Directory / File Sharing: Default file & directory shares and simple file sharing if offered by the operating system are disabled. Sharing if any is authorized Are guest accounts disabled / hashed out / deleted 	



	1 1	
Auditing is enabled for events like Account logon events,		
Account Management, Object access, Policy change, privilege		
use, system events		
Do all users adhere to Access Controls like described in		
(Section 3 of Annexure A)		
AC_Pro: Access Control Procedure / Process		
1 AC_Pro1		
2 AC_Pro2		
3 AC_Pro3		
4 AC_Pro4		
4 AC_Pro5		
5 AC_Pro6		
AC_Auth: Access Control Authentication		
1 AC_Auth1		
2 AC_Auth2		
3 AC_Auth3		
AC_Pwd: Access Control Password		
1 AC_Pwd1		
2 AC_Pwd2		
3 AC_Pwd3		
4 AC_Pwd4		
5 AC_Pwd5		
6 AC_Pwd6		
7 AC_Pwd7		
8 AC_Pwd8		
9 AC_SS		
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Are system clocks synchronized to atomic clock to ensure synchronization.	
Are critical systems located behind firewall with default rules to deny all traffic and only identified specific application,	
database and system protocols are allowed.	
The system is adequately protected from malware (such as	
viruses, spywareetc) with controls such as antimalware /	
antivirus system and that rules / definitions are updated	
The entire system is scanned periodically to ensure protection.	
5 Network and Network Security	
	.
Description	Yes / No
Are networks adequately managed, controlled and monitored	
Does network provide security to the data, systems and	
applications in the network.	
The network security protocols and interface standards	
deployed are as per prevalent industry standards	
Do all users adhere to Access Controls like described in	
(Section 3 of Annexure A)	
Is information travelling over network (Wired & / wireless)	
adequately protected with mechanism such as VPN, TLS /SSL / . WPA2.	
Is backup network link available in case of failure of the	
primary link to the BSE	
Is backup network link available in case of failure of the	
primary link connecting the customers	
Does alternate communications path between employees and	
the firm exists	
Does alternate communications path with critical business	
constituents, banks and regulators exists	



□ Verify location(s) of nodes in the network		
□ Verify number of nodes in diagram with actual	-	
Date of submission to BSE.	-	
Are parameters identified and logged to enable traceability and	-	
non-repudiation of orders / actions performed with relevant		
details like IP address, MAC address, time and other data		
Are network device clocks synchronized to atomic clock		
Are network segments used to segregate critical, non critical		
and user systems		
Are notwork devices appropriately notched (uncreaded with		
Are network devices appropriately patched / upgraded with latest firmware		
latest filmware		
Log events are identified, monitored, reviewed and escalated		
6 Database and Database Security		
Description	Yes / No	
Do all users adhere to Access Controls like described in		
(Section 3 of Annexure A)		
AC_Pro: Access Control Procedure / Process		
1 AC_Pro1		
2 AC_Pro2		
3 AC_Pro3	-	
4 AC_Pro4		
4 AC_Pro5	1	
5 AC_Pro6	1	
AC_Auth: Access Control Authentication		
1 AC_Auth1	1	
	1	
2 AC_Auth2		



3 AC_Auth3	
AC_Pwd: Access Control Password	
1 AC_Pwd1	-
2 AC_Pwd2	-
3 AC_Pwd3	-
4 AC_Pwd4	-
	_
5 AC_Pwd5	
6 AC_Pwd6	
7 AC_Pwd7	
8 AC_Pwd8	
9 AC_SS	-
Database – Firewall	-
DB FW1 - Is the database server located behind a firewall with	-
default rules to deny all traffic.	
DB FW2 - Is the database server firewall is opened only to	-
specific application or web servers, and firewall rules do not	
allow direct client access.	
DB FW3 - Firewall rule change control procedures are in place	-
and notification of rule changes are distributed to System Administrators (SAs) and Database Administrators (DBAs).	
DB FW4 - Are firewall rules for database servers maintained	_
and reviewed on a regular basis by SAs and DBAs.	
Secured Environment	-
	_
DB_SE1 - Is the database software installed by exclusive user. Is this user, super user / Administrator	
DB_SE2 -Is the database software owner account granted the	_
minimum set of operating system rights necessary for database	
operation.	
	-



DB_SE3 -IS the database software version is currently	
supported by the vendor or open source project.	
	-
DB_SE4 -Are all unused or unnecessary services or functions	
of the database are removed or turned off.	
DB_SE5 -Are unneeded default accounts are removed, or else	
passwords are changed from defaults.	
DB_SE6 -Are Null passwords used, and have the temporary	
files from the install process that may contain passwords are	
removed.	
DB_SE7 -Database software is patched to include all current	-
security patches. Provisions are made to maintain security patch	
levels in a timely fashion.	
DB_SE 8 Are all old setup files / test databases / sample	1
databases deleted / secured / access removed	
databases deleted / secured / access removed	
DB_SE 9 log events are identified audit trails enabled,	
reviewed and monitored	
DB SE 10 the clock of the system hosting the database is	
synchronized with atomic clock	
-	
Database – IML	
	-
DB_IML1- Do all users of system adhere to Access Controls	
like described in Section 4 Annexure A	
DD IMI 2. The IMI detabase is bested on a secure relation	-
DB_IML2- The IML database is hosted on a secure platform	
and adheres controls like mentioned in Section 4 Annexure A	
DB_IML3- The information in the database used to store/	
retrieve transaction information is secured with controls	
Terreve transaction information is secured with controls	
Are system clocks of system hosting the database synchronized	
to atomic clock.	
to atomic clock.	
7 Encryption	•
Description	Yes / No
Is all data transmission between the client & broker / member	
secured through end to end encryption through a secure	



standardized protocol*	
Does the key size used for encryption adhere to the policies & /	
guidelines mandated by relevant authorities*	
Key management procedures for decrypting are documented,	
available to more than one (authorized) person's, approved by	
the data proprietor and procedures for secure key management	
followed.	
Are the encryption keys stored in secure location and access	
procedures documented.	
SSL / TLS used by web based application	
Are certificates issued to the member / broker organization	
The continuous issued to the member / broker orgunization	
Are the certificates used on the server facilitating confidential	
information – like trade data	
Is the login page and all subsequent authenticated pages	
exclusively accessed over TLS/SSL	
Provide the following details	
Certificate Issuer: (Name)	
certificate issuer. (ivalite)	
Validity Not Before: (Date)	
•	
Validity Not After: (Date)	
In access of Oliont Server emplication model (Thick Oliont)	
In case of Client Server application model (Thick Client)	
Does the application architecture adequately ensure security of	
information sent over internal / external network	
mornation sont over internal / external network	
Is the information transmitted in encrypted form	
Please provide supporting letter from vendor on his letterhead.	
Do the ensuration doubtered and mean day 14, 14, 14, 14, 14, 14, 14, 14, 14, 14,	
Do the encryption deployed and procedures related to it align to	
policies and regulations of DoT (Department of Telecom) & /	
Information Technology Act 2000	



8 Audit Log & Monitoring		
Description	Yes / No	
ALM1 - Are audit logs for systems, databases, networks and		
applications appropriately identified and enabled for recording		
of relevant actions and events.		
ALM2 - All session initiation and termination events are logged and audited.		
ALM3 - Are logs reviewed and exceptions / findings if any		
escalated.		
ALM4 - Are systems adequately capable of noting all		
transactions conducted with sound audit trails available for all		
transactions		
9 Capacity Management		
Description	Yes / No	
CM1 - Are the resources monitored, tuned and calculations		
made for future capacity requirements to ensure the required		
performance.		
CM2 - Are data storage, backup systems, system capacities		
adequately available for handling data transfer, and arranged		
for alternative means of communications in case of Internet link		
failure.		
CM3 - Do systems have built-in high system availability to		
address any single point of failure		
CM4 - Are backup resources available to ensure that all		
essential information and software can be backed up and tested		
for restoration		
10 Pre-Trade Risk Control: Value Limit per Order etc.	1	
Are the following SEBI and BSE Limited circulars complied to		
1 - SEBI circular CIR/MRD/DP/34/2012 dated December 13, 2012		
2 – BSE Limited circular no. 20121214-14 dated December 14, 2012		
3 - BSE Limited circular no. 20130108-20 dated 08 Jan 2013		



11 Online Risk Management Tools & Order Entry		
Description:	Yes / No	
Whether Exchange circular 20121101-16 dated November 1,		
2012 has been complied with ?		
The Risk Management Tool has provisions for setting		
parameters such as		
Trading Limits		
Exposure Limits		
Order Quantity Limits		
Order Value Limits		
Price range checks		
Net Position Limits		
The risk management tool ensures the following for all orders,		
before being placed		
Online risk assessment of the orders to be placed.		
Online risk monitoring of the orders being placed.		
Online risk management of the orders being placed.		
Does system allow only authorized administrative user to alter		
the risk parameters of users		
Does system allow manual placement (through approved		
mechanism) for allowing orders that do not fit the system based		
risk control parameter.		
Are orders successful / unsuccessful or valid / invalid are		
logged, reviewed and auditedby the risk management system		
Appropriate validation of all risk parameters is done before placing the order		
	1	



Order Entry	
Description	Yes / No
Only duly authorized client's orders are allowed to be placed.	
Order entry for Pro types of orders is executed through specific user ids.	
The system does not have an order matching system and all orders are passed on to the exchange trading system for matching. on the basis of priority of receipt of the orders from the clients	
12 Features of System	
Scope: Application	
Description	Yes / No
Are all servers used for routing orders to BSE Ltd trading	
system are hosted (geographically located) in India.	
Does system allows only authorized and validated users to	
establish a session with the system.	
Does system allow only authorized administrative users to	
terminate a users session.	
System deployed routes the orders in neutral manner	
Features of system have been submitted to BSE Ltd.	
Does system have unique identification numbering system for	
all orders to identify trades uniquely and all orders with time	
stamp are available with reference to the unique identification	
number	
In case no activity by the client, does the system provide	
automatic trading session logout	
In case of failure of service / system / facility (for ex - network,	
application), alternative modes of communications for placing orders are available	
Price Broadcast	



Does system allows order entry and confirmation of order is		
provided to the user on submission of the order.		
Does system provide order modification / cancellation	+	
facilities.		
Does system have capability to provide trade confirmation to		
the user, along with history of trades for the day.		
Allow for checking the pending orders i.e. the orders that have		
not yet traded or partially traded.		
Provides feature of reporting the trades happened		
riovides feature of reporting the trades happened		
Allows for the reporting of client wise / user wise margin		
requirements as well as payment and delivery obligations.		
Whether the System uses authentication measures like smart	+	
cards, biometric authentication etc.		
Whether the system has a second level of password control for critical features		
critical features		
Is periodic verification of UCC & location details of data done		
Wherever applicable session login credential details are not		
stored on the devices used for trading		
Are features available in the system to identify IML-IBT/		
STWT (Mobile) / SOR / DMA orders, trades and related data.		
Reporting		
R1: Are there features / facilities available to generate MIS		
reports for reporting to exchange, SEBI or other relevant		
regulators.		
R2: Are procedures / processes set for reporting and lists /]	
checklist used for such purposes.		
13 IML –IBT (Internet Based Trading) (Order Routing Syste	em)	
Scope: Application, Database, System & Network as applicable		
Description	Vac / No	
Description	Yes / No	





	1
Are processes & procedures implemented to ensure that norms	
mentioned in SEBI Circular / Directives regarding to Internet	
Based Trading adhered to	
(refer	
1 - SMDRP/POLICY/CIR-06 /2000 Dated January 31, 2000	
2 - CIR/MRD/DP/8/2011 Dated June 30, 2011)	
Are they complied	
With reference to BSE Limited notice – notice no - 20130128-	
2; dated 28 Jan 2013	
With the implementation of Two-factor authentication, is the	
-	
automatic expiry of password revised.	
14 Securities Trading Using Wireless Technology [Mobile Tr	ading
Scope: Application, Database, System & Network as applicable	61
scope. Application, Database, System et retwork as applicable	
Description	Yes / No
Are all relevant requirements as applicable to internet based	
trading being adhered to securities trading using wireless	
technology	
Is STWT order routing is available to all clients and they are	
communicated all features, possible risks, rights,	
responsibilities and liabilities associated with the STWT	
facility.	
Does the client desirous of availing such (STWT) facility has to	
do so by entering into a broker-client agreement, as applicable.	
For the existing clients, is the same implemented through an	
addendum to the existing broker-client agreement, as	
applicable.	
In case of issues due to form factor, has it been ensured that	
minimum information has been given with addresses of the	
internet web site /web page where detailed information would	
be available.	
The application used for mobile trading is	
$1 - 3^{rd}$ party solution from empanelled vendor with BSE	-
1 – 5 party solution from empanetied vendor with BSE	





Are features of system adequately available, controlled as applicable (Ref Section 11 of Annexure A)	
Are processes & procedures implemented to ensure that norms mentioned in SEBI Circular / Directives regarding to STWT adhered to	
(refer -	
1 - CIR/MRD/DP/25/2010 Dated August 27,2010	
2 - CIR/MRD/DP/8/2011 Dated June 30, 2011)	
Are they complied	
With reference to BSE Limited notice – notice no - 20130128-	
2; dated 28 Jan 2013	
With the implementation of Two-factor authentication, is the automatic expiry of password revised.	
15 Smart Order Routing (SOR)	
Scope: Application, Database, System	
Scope: Application, Database, System Description	Details
	Details
Description	Details
Description Is smart order routing is available to all clients and they are	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility.	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable.	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable. For the existing clients, is the same implemented through an	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable.	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable. For the existing clients, is the same implemented through an addendum to the existing broker-client agreement, as applicable. Are all type of trades / orders executable as chosen by the user	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable. For the existing clients, is the same implemented through an addendum to the existing broker-client agreement, as applicable. Are all type of trades / orders executable as chosen by the user and user requests for specific orders not to be used under SOR	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable. For the existing clients, is the same implemented through an addendum to the existing broker-client agreement, as applicable. Are all type of trades / orders executable as chosen by the user	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable. For the existing clients, is the same implemented through an addendum to the existing broker-client agreement, as applicable. Are all type of trades / orders executable as chosen by the user and user requests for specific orders not to be used under SOR	Details
Description Is smart order routing is available to all clients and they are communicated all features, possible risks, rights, responsibilities and liabilities associated with the smart order routing facility. Does the client desirous of availing such (SOR) facility has to do so by entering into a broker-client agreement, as applicable. For the existing clients, is the same implemented through an addendum to the existing broker-client agreement, as applicable. Are all type of trades / orders executable as chosen by the user and user requests for specific orders not to be used under SOR facility recorded and documented	Details



Organizational policies & procedures exists and are followed	
for SOR (Ref Section 1 of Annexure A)	
	-
Perimeter & Environmental Security controls exists and are	
followed (Ref Section 2 of Annexure A)	
Controls related to concern evicts (Def Section 2 of Amount A)	-
Controls related to access exists (Ref Section 3 of Annexure A)	
IT Systems and System Security Controls exists and are	-
adhered to	
(Ref Section 4 of Annexure A)	
(Ref Section 4 of Annexure A)	
Network and Network Security controls exists and are adhered	
to (Ref Section 5 of Annexure A)	
Database deployed adhere to database and database security	
controls (Ref Section 6 of Annexure A)	
Encryption controls are deployed and applicable procedures are	
adhered to (Ref Section 7 of Annexure A)	
	-
Audit logs for activities are registered and monitoring controls	
exist (Ref Section 8 of Annexure A)	
Capacity related procedures, processes and controls are	
deployed and monitored (Ref Section 9 of Annexure A)	
Online Risk Management Tools and Order Entry controls as	-
applicable are followed for all orders placed (Ref Section 10 of	
Annexure A)	
Are features of system adequately available, controlled as	
applicable (Ref Section 11 of Annexure A)	
Order Decision	
	-
OD1: Are all activities related to orders and trade logged to	
facilitate audit trail and records maintained along with the	
details such as orders, trades and data points for the basis of	
decision	
OD21 is there facility for logging data related to order (the log	-
OD2: is there facility for logging data related to orders / trades	
(on random sampling / continuous basis) used to support the	
decision of trade / order. Is it being used, reviewed and audited.	
decision of trade / order. Is it being used, reviewed and audited.	



Does the application monitors best bids and offers and updates instantly as the market moves:		
Does the application provide transparency in terms of time delays		
domy5		
Are controls available and implemented to ensure that orders		
thorough SOR are placed at recognized stock exchanges only.		
Does functionality exists to specify for individual orders for		
which they do not want to route the order using SOR		
Are well documented records available to support of not using		
SOR for particular order by client (who has availed SOR facility)		
Are processes & procedures implemented to ensure that norms		
mentioned in SEBI Circular / Directives regarding to STWT adhered to		
(for Ex		
1 - CIR/MRD/DP/26/2010 Dated August 27, 2010		
2 - CIR/MRD/DP/36/2010 Dated December 09, 2010)		
Are they complied		
16 Direct Market Access		
Scope: Application, Database, System	1	
Description	Yes / No	
Clients having access to DMA have been provided access after		
execution of agreement with conditions as prescribed in the		
"Model Agreement" by BSE and such agreement is valid		
currently.		
Organizational policies & procedures exists and are followed		
for SOR (Ref Section 1 of Annexure A)		
-		
Perimeter & Environmental Security controls exists and are followed (Ref Section 2 of Annexure A)		
-	-	



adhered to	
(Ref Section 4 of Annexure A)	
Naturaly and Naturals Converter la prints and one adheard	-
Network and Network Security controls exists and are adhered	
to (Ref Section 5 of Annexure A)	
Detailers dealers de discus de detailers and detailers annéter	-
Database deployed adhere to database and database security	
controls (Ref Section 6 of Annexure A)	
Encryption controls are deployed and applicable procedures are	-
adhered to (Ref Section 7 of Annexure A)	
Audit logs for activities are registered and monitoring controls	
exist (Ref Section 8 of Annexure A)	
Consists related mesoadsmas, mesoasses and controls are	-
Capacity related procedures, processes and controls are	
deployed and monitored (Ref Section 9 of Annexure A)	
Online Risk Management Tools and Order Entry controls as	-
applicable are followed for all orders placed (Ref Section 10 of	
Annexure A)	
	-
Are features of system adequately available, controlled as	
applicable (Ref Section 11 of Annexure A)	
Are unique identification numbers given as in case of internet	-
based trading, to identify trades and orders done using DMA	
and log of events with timestamp are available with reference	
to the unique identification number and such records are	
available for minimum of 5 years	
Are there controls available and implemented in the system for	
DMA order masking to prevent front running of the orders.	
Appropriate validation of all risk parameters is done to ensure	
that trading limits/ exposure limits/ position limits are set for all	
DMA clients	

Details of the IML ID's used by the trading members:

Clearing No: _____



IML ID	Software Details(Inhouse/ Vendor Name)	Purpose of procurement	IML Location (Address)	Date of activation.

1.	Whether the required details of all the Ids created in the IML server of the trading member, for any purpose (viz. administration, branch administration, surveillance, risk management, trading, testing, etc) and any changes therein, have been uploaded to the Exchange? If no, please give details	YES/NO
2.	Whether all the IML user ids created in the IML server of the trading member has been mapped to 16 digits LOCATION ID on one-to-one basis and a record of the same is maintained?	YES/NO



Annexure B (Optional)

Areas of Audit		Auditors Remarks (Supporting Observations, Findings, References & Substantiation)
17 Policies, Procedures and Documents Availability		
Description	es / No	
Information Security Policy		
Password Policy		
User Management and Access Control Policy		
Network Security Policy		
Application Software Policy		
Backup Policy		
Change Management Policy		
BCP and Response Management Policy		
Audit Trail Policy		
Other policies followed if any and its reference		



8 Approvals, undertaking, agreements, policies:	
Description	Yes / No
1 - Internet Trading	
2 - SOR	
3 - Wireless (Mobile Trading)	
4 - DMA	
For the above segments are the following documents available	
Copy of application to exchange	
Approval / Copy of approval from exchange	
Undertaking(s) provided as per relevant circulars as required by	
exchange / SEBI	
Undertaking provided regarding the IML system as per relevant	
circulars	
Whether the Insurance policy of the Member covers the additional risk	
of usage of IML and or Internet Trading	
9 Change Management	
Description	Yes / No
F	
Changes to the system supporting trading are made in a planned	
manner	
Changes are made by duly authorized personnel	
Risk involved in the implementation of the changes duly factored in	
The implemented change duly approved and process documented	
The change request process documented	
Change implementation process supervised to ensure system integrity	
and continuity	
User acceptance of the change documented	
Unplanned changes duly authorized and the manner of change	
documented later	
SDLC documentation and procedures if the installed IML system is	
developed in-house	
0 User Management	
Description	Yes / No
	100/110
No. of user Ids created	
All users are uniquely identified through issue of unique IML ids.	
No. of Users are deleted and logs are maintained	
No. of Users are disabled and logs are maintained	
No. of users reissued and logs are maintained	
No. of users whose accounts are locked with logs	
The users in the system are created by authorized personnel at server	
level	



Description	Yes / N
Backups for the critical system components	
Gateway / Database Server	
Audit Trails	
IML router	
Network Switch	
Communication lines	
Infrastructure breakdown backup	
Electricity	
Water	
Air Conditioning	
Alternate physical location of employees been made in case of non availability of the primary site	
Provisions for Books and records backup and recovery (hard copy an electronic).	d
Mission-critical systems been identified and provision for backup for	
such systems been made	
Are backup and recovery procedures defined, approved and	
documented	
Are backup and restoration records and logs maintained.	
Are backup media stored safely in line with risks	
22 Daily Operational Activities	
Description	Yes / No
	1057110
Provision for Begin of day activity	
Audit Trails	
Access Logs	
Transaction Logs	
Backup Logs	
Alert Logs	
	1
Activity Logs	
Activity Logs Misc (Please specify): Provision for End of day activity System for log monitoring, escalation & corrective measures taken,	
Activity Logs Misc (Please specify): Provision for End of day activity System for log monitoring, escalation & corrective measures taken, if any.	
Activity Logs Misc (Please specify): Provision for End of day activity System for log monitoring, escalation & corrective measures taken, if any. The IML solution should not in any manner suggest to the user by	
Activity Logs Misc (Please specify): Provision for End of day activity System for log monitoring, escalation & corrective measures taken, if any.	



23 Response Procedures		
Description		
Access Control failure		
Beginning of Day failure		
End of Day failure		
Other system Processes failure		
24.Other information		
Description		
Gateway Parameters		
Trader ID		
Cash Segment		
IML ID		
□ IP Address		
$\Box \qquad (BSE Network)$		
U VSAT ID		
Leased Line ID		
F&O Segment		
DIML ID		
□ IP Address		
$\Box \qquad (BSE Network)$		
U VSAT ID		
□ Leased Line ID		
25. Auditor comments towards data and information related to trade and	d orders	
Confidentiality:		
Integrity:		
Availability:		
Non-Repudiation:		



Annexure C (Mandatory)

INFORMATION SYSTEM AUDIT OF_____

Sr No	Area of Audit	Classification of Controls in Annexure A S / A / I	Classification of Controls in Annexure B S / A / I
1	Organization structure exists and supports governance through policies, procedures, processes and guidelines.		NA
2	Systems & processes related to perimeter and environmental security controls exists		NA
3	Access, Authentication and Authorization to systems (systems, database, os, networks etc) is commiserate with the importance of the systems		
4	Systems follow policies & procedures to protect from threats that might exploit the system.	NA	
5	Network & Network Security follow policies & procedures to protect from threats that might exploit the system.NA		NA
6	Database systems follow policies & procedures to protect from threats that might exploit the system.		NA
7	Processes and procedures for encryption deployed for protection of data is established		NA
8	Audit logging and monitoring are established to identify and determine accountability of actions performed.		NA
9	Processes and procedures followed for capacity management are established.		NA
10	Pre-Trade risk control: Value limit per order etc. are implemented and adhere to all applicable circulars from SEBI & BSE Limited		
11	Online risk management tool and order entry are supported.		NA
12	Features of system are established and implemented		NA
13	IML / IBT systems are controlled and adhere to all applicable circulars from SEBI & BSE Limited		NA



14	Securities Trading using Wireless Technology (Mobile Trading)NAsystems are controlled and adhere to all applicable circularsfrom SEBI & BSE Limited		NA
15	Smart Order Routing systems are controlled and adhere to all applicable circulars from SEBI & BSE Limited	all NA	
16			NA
17	Are policies available, implemented and reviewed for implementation.	NA	
18	Are communication documents viz application, approval, & undertaking available, valid and secured.	NA	
19	Is change management an established process and procedures for change are implemented in controlled manner.	NA	
20	Is user management done according to policy defined and procedures adhere to the policy, records for implementation and adherence are available.	NA	
21	Is redundancy and backup available and tested in case of system failure.	NA	
22	Are daily operational activities controlled and logged to demonstrate control	NA	
23	Are response procedures available and records of use indicate established procedure.	NA	
24	Is information related to parameters available and updated periodically	NA	
25	Any other comment by auditor towards data and information related to trade and orders	NA	



Declaration: Member Summary

Sr #	Trading Facilities	Trading Facility Offered? (Yes / No)	Trading Facility Audited? (Yes / No)
1	IML – IBT Trading (Internet Based Trading)		
2	STWT (Securities Trading Using Wireless Technology)		
3	SOR (Smart Order Routing)		
4	DMA (Direct Market Access)		

All the branches where IML-IBT / STWT/ DMA facility is provided, have been audited and consolidated report has been submitted.

I undersigned assure of circulars issued by SEBI an BSE Limited have been referenced for checking the compliances and that the contents of the report as per audit performed by me and declare there is no conflict of interest with respect to the member being audited.

Audit recommendations (if any) in relation to System Audit report for the year ended March 31, 2012 that have been duly implemented / not implemented are mentioned separately as annexure (as a part of System Audit report).

In case you have been rated as "Medium/Weak" in any areas by System auditor between April 1, 2012 to March 31, 2013 (prior to granting approval for Internet based Trading/ Direct Market Access/ SOR/ Wireless securities trading except for Algorithmic Trading) please submit "Action Taken Report" duly certified by your system auditor detailing the actions taken by you on various individual "Medium/ Weak areas.

Signature

(Full Name of the Auditor & Auditing firm)

CISA Registration Number:

Date:

Place:

Member Name:

BSE Clearing Number

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Auditor Name



Note: Criteria for Evaluation of Controls are indicated below, based on these "Area of Audit" as mentioned in Annexure A & B are to be rated.

Evaluation of Controls	Description
Strong	Controls are said to be Strong if objectives are fully complied with and no material weaknesses are found.
Adequate	Controls are said to be Adequate if objectives are substantially complied with and no material weakness result in substantial risk exposure due to non-compliance Compensatory controls exist which reduce the risk exposure to make it immaterial vis –a-vis the non-compliance with the criteria.
Inadequate	Controls are said to be Inadequate if objectives are not complied with. Compensatory controls fail to reduce the risk so as to make it immaterial vis-à-vis the non- compliance with the compliance criteria.