

**Newsletter**  
Volume 13, August 2023



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## Editor's note

Dear Readers,

I am pleased to share with you the SNG Newsletter for the month of August, 2023.

Arbitration has long been recognized as an effective alternative dispute resolution mechanism, designed to expedite proceedings and reduce the burden on traditional court systems. Two recent rulings by the Calcutta High Court and the Karnataka High Court shed light on key aspects of arbitration proceedings in India.

The Insolvency and Bankruptcy Code, 2016 (IBC) has been a dynamic legal framework in India, constantly evolving through judicial interpretations and regulatory amendments. A series of recent decisions by various benches of the National Company Law Tribunal (NCLT) and the National Company Law Appellate Tribunal (NCLAT), as well as regulatory changes by the Insolvency and Bankruptcy Board of India (IBBI), have significant implications for the insolvency landscape in the country.

The Ministry of Corporate Affairs (MCA) has recently introduced significant amendments to two key regulatory frameworks, the Companies Incorporation Rules, 2014, and the Companies (Compromises, Arrangements and Amalgamations) Rules, 2016. These changes are aimed at streamlining and enhancing corporate governance and regulatory processes in the Indian business landscape. We have included a brief overview of these noteworthy amendments.

The Reserve Bank of India (RBI) has recently taken significant steps to improve transparency and fairness in lending practices. These measures are aimed at ensuring that borrowers are treated equitably and have clear information about the terms and conditions of their loans.

Several significant regulatory changes have been introduced by SEBI. A streamlined process for obtaining SEBI's prior approval for change in control with respect to Merchant Bankers and Bankers to an Issue is introduced, emphasizing on online applications and declarations. SEBI has also expanded the dispute resolution mechanism by establishing an Online Dispute Resolution Portal for resolving disputes between investors/clients and market entities. These regulatory changes aim to enhance transparency and efficiency in India's securities markets.

I hope you will find this edition useful.

Best wishes,

*Rajesh Narain Gupta*

Managing Partner,  
SNG & Partners



## A. ARBITRATION

### **1. Calcutta High Court rules: An application made u/S. 9 is not expected to make full disclosures and place evidence substantiating the apprehension that has been pleaded**

In an application made under Section 9 of the Arbitration and Conciliation Act, 1996 for the grant of an interim measure, the Calcutta High Court noted the legislative intent behind Section 9 (1) and held that it is not essential to make full disclosures and place evidence substantiating the apprehension pleaded. It was further noted holding a party to this kind of rigor would discharge the kind of relief as contemplated under section 9(1).

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### **2. Karnataka High Court expounds: Objection to entertaining Suit based on Arbitration Clause is to be raised before Court at first appearance and not later**

The Karnataka High Court allowed an appeal filed under Order XLI Rule 1 R/W Sec. 96 of CPC, 1908 against the judgment and decree dated 02.03.2016 vide which the suit for permanent injunction was dismissed on the ground that the parties to the suit have to invoke the provisions of the Arbitration and Conciliation Act, 1996.

The Court observed that after having recorded evidence, the Court could not have dismissed the suit on the premise that the parties have to take recourse to the provisions of the Act of 1996.

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## B. INSOLVENCY AND BANKRUPTCY CODE, 2016 (IBC)

### 1. NCLT, Mumbai Bench rules: Any subsequent agreement will not change the nature of transaction

The NCLT, Mumbai Bench expounded that any agreement cannot alter the nature of the transaction and hence, the financial creditor will remain to be an allottee.

In the present case, the Corporate Debtor could not start the construction for flat and subsequently the amount received for purchase of flat was converted to a loan that had to be repaid. The Tribunal noted that the actual nature of transaction was between the parties as builder and allottee. However, in lieu of Section 5(7) read with 5(8)(f) of the Insolvency and Bankruptcy Code, 2016 (hereinafter referred to as "IBC"), it was propounded that the CIRP was to be filed by minimum of 100 of allottees under the same real estate project. In the present case, a single allottee had commenced the CIRP.

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### 2. NCLAT, New Delhi Bench sets aside order of striking off the name of the Company

The NCLAT, New Delhi Bench after observing annual returns and balance sheet propounded that the Company was actively undertaking business transactions and was a going concern at the time of striking off the name from the register of the Registrar of Companies. Therefore, the order directing striking off the name was bad in law and accordingly set aside.

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### 3. IBBI amends the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016

The Insolvency and Bankruptcy Board of India has notified an amendment in the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016.

An explanation has been inserted in the Regulation 31A (1). The explanation inserted is as follows:

"Explanation: For removal of doubts, it is hereby clarified that the regulatory fee under this sub-regulation, shall not be payable in cases where the approved resolution plan in respect of insolvency resolution of a real estate project is from an association or group of allottees in such real estate project."

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**4. NCLT, New Delhi dismisses Sec 7 application as debt was not financial debt, Read Judgement**

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The NCLT, New Delhi Bench in the case where a tripartite agreement was signed between the builder (Corporate Debtor) , borrower and bank, opined that in the present case, the debt cannot be said to be a financial debt. It was noted that the principal creditors in the present case are the buyers to whom the financial debt is owed and hence, only they have the locus standi to file an application.

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**5. NCLAT, New Delhi expounds: Personal Guarantee can be discharged in a Resolution Plan**

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The NCLAT, New Delhi Bench opined that by approval of the plan, the personal guarantors are not per se and ipso facto discharge from the obligations that may arise of the guarantee given to the Financial Creditor. However, it is not to say that the personal guarantee can never be discharged in a resolution plan. It was further noted that moratorium does not apply to personal guarantors.

In the present case, there was a specific clause in the plan about the release of the personal guarantee. It was observed that when the CoC itself approved the plan after deliberations on the said clause, the NCLT could not have interfered with that commercial wisdom.

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**6. NCLAT, New Delhi upholds Distinction in the amount to be paid to assenting financial creditors and dissenting financial creditors**

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The NCLAT, New Delhi Bench opined that Section 30(2)(b) (ii) of the Insolvency and Bankruptcy Code, 2016 (hereinafter referred to as “IBC”) clearly contemplates that the payment of debts of financial creditor who does not vote in favor of the plan shall not be less than the amount to be paid to such creditor as per Section 53(1) in the event of liquidation.

Further, Form-H of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016 (hereinafter referred to as “Regulations, 2016”) also provides for 2 categories i.e., assenting financial creditors and dissenting financial creditors.

Therefore, it was expounded that the contention that there can be no discrimination in terms of amount to be paid between assenting and dissenting financial creditors cannot be accepted.

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**7. NCLT, New Delhi expounds: A stock broker Company is a Financial Service Provider and does not come within the definition of Corporate Person**

The NCLT, New Delhi Bench noted that the definition of financial products covers securities and different types of contracts which are not defined under the Insolvency and Bankruptcy Code, 2016 ( hereinafter referred to as “IBC”). Therefore, the Securities Contracts (Regulation) Act, 1956 was looked at.

It was opined that the Shares, Scrips, Stocks, Bonds, Debentures, Debenture Stocks etc., are included under the term “Securities” and hence, can be treated as financial products as per Section 3(15) of the IBC.

Noting that the Corporate Applicant deals in securities, it was expounded that the Corporate Applicant would be a financial service provider and was registered with SEBI.

Therefore, Corporate Applicant was outside the purview of the Corporate Person as defined under Section 3(17) of the IBC and hence, could not file a Section 10 Application.

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**8. NCLAT, New Delhi opines: Threshold is Rs. 1 Crore only even if demand notice sent prior to the MCA notification**

The NCLAT, New Delhi Bench in the case wherein notice was given by Appellant on 31.01.2020 claiming an amount of Rs. 41,81,024 and the reply by Corporate Debtor was sent on 17.03.2020, upheld the order of NCLT dismissing Section 9 Application under the Insolvency and Bankruptcy Code, 2016 (hereinafter referred to as “IBC”) on the ground that the application was filed pursuant to the notification, hence, the threshold would be Rs. 1 crore only.

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**9. Supreme Court upholds that NCLT has power to recall but cannot review**

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The Hon'ble Supreme Court has upheld that judgement of 5-judge Bench in the matter titled as Union Bank of India v. Dinkar T. Venkatasubramanian & Ors in which it was held that the Tribunal does not have the power to review but it does have the power to recall its judgement as this is inherent in the Tribunal under Rule 11 of the NCLAT Rules, 20116.

It was also held that the power to recall a judgement can be exercised by the Tribunal when any procedural error is committed. Some examples of grounds for recalling a judgement are the necessary party not being served, or not before the Tribunal when the judgement was delivered. Another important ground for recalling a judgement is the ground of fraud played on the Court in obtaining a judgement from the Court.

Regarding the law laid down in the judgements titled as "Agarwal Coal Corporation Pvt. Ltd. V. Sun Paper Mil Limited & Anr." and "Rajendra Mulchand Varma & Ors. V. K.L.J Resources Ltd. & Anr.", the Bench opined that the judgements to the extent of power to recall do not lay down a correct law as the power to recall is an inherent power of the tribunal.

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**10. NCLAT, New Delhi opines: CoC has power to change the management of subsidiary**

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The NCLAT, New Delhi Bench opined that the Committee of Creditors has the power under Section 28(1)(j) of the Insolvency and Bankruptcy Code, 2016 (hereinafter referred to as "IBC") to change the management of the subsidiary. Moreover, the fact that application is pending under Section 66 of IBC is irrelevant for the purposes of the Committee of Creditors to exercise its power.

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**11. NCLAT, Chennai Bench rules: Sec 10A not to apply when default committed prior to March 25, 2020**

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The NCLAT, Chennai Bench has opined that the embargo in Section 10A of the Insolvency and Bankruptcy Code, 2016 (hereinafter referred to as the “IBC”) shall receive a purposive construction.

In light of the Supreme Court’s decision in Ramesh Kymal versus M/s. Siemens Gamesa Renewable Power Pvt. Ltd.’ Civil Appeal No.4050 of 2020; it was held that Section 10A shall not be applicable in case where the default is committed prior to 25.03.2020.

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**12. NCLAT, Chennai Bench expounds: Decision on contractual interest liability outside the scope of IBC**

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The NCLAT, Chennai Bench opined that the penal interest provision has to be dealt with as per the Settlement Agreement which the parties signed. The Bench propounded that the contractual interest liability is outside the purview of Insolvency and Bankruptcy Code, 2016 (hereinafter referred to as “IBC”). It was held that the interest continues to accumulate till the amount is repaid and therefore, there was no illegality in the decision of the Committee of the Creditors.

Further, it was expounded that Section 14 IBC does not specify any interest waiver during the period of moratorium. Hence, the contention that no interest could be charged after the claims have been admitted was bad in law.

On the issue of Promoter being MSME and still not being given preference, it was held that the IBC does not envisage any preference to be given to an MSME while accepting a resolution plan.

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## C. MINISTRY OF CORPORATE AFFAIRS (MCA)

### 1. Amendment in the Companies Incorporation Rules, 2014

An amendment has been made in the Companies Incorporation Rules, 2014. In the annexure for Form No. RD-1, a form has been substituted in which Clause 14 has been added which asks about the details of transferor company with respect to its name and CIN.

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### 2. Amendment in Companies (Compromises, Arrangements and Amalgamations) Rules, 2016

Rule 25(5) and (6) of the Companies (Compromises, Arrangements and Amalgamations) Rules, 2016 have been substituted as follows:

“(5) Where no objection or suggestion is received within a period of thirty days of receipt of copy of scheme under sub-section (2) of section 233, from the Registrar of Companies and Official Liquidator by the Central Government and the Central Government is of the opinion that the scheme is in the public interest or in the interest of creditors, it may, within a period of fifteen days after the expiry of said thirty days, issue a confirmation order of such scheme of merger or amalgamation in Form No. CAA.12:

Provided that if the Central Government does not issue the confirmation order within a period of sixty days of the receipt of the scheme under sub-section (2) of section 233, it shall be deemed that it has no objection to the scheme and a confirmation order shall be issued accordingly.

(6) Where objections or suggestions are received within a period of thirty days of receipt of copy of scheme under sub-section (2) of section 233 from the Registrar of Companies or Official Liquidator or both by the Central Government and –

(a) such objections or suggestions of Registrar of Companies or Official Liquidator, are not sustainable and the Central Government is of the opinion that the scheme is in the public interest or in the interest of creditors, it may within a period of thirty days after expiry of thirty days referred to above, issue a confirmation order of such scheme of merger or amalgamation in Form No. CAA.12.

(b) the Central Government is of the opinion, whether on the basis of such objections or otherwise, that the scheme is not in the public interest or in the interest of creditors, it may within sixty days of the receipt of the scheme file an

application before the Tribunal in Form No. CAA.13 stating the objections or opinion and requesting that Tribunal may consider the scheme under section 232 of the Act:

Provided that if the Central Government does not issue a confirmation order under clause (a) or does not file any application under clause (b) within a period of sixty days of the receipt of the scheme under sub- section (2) of section 233 of the Act, it shall be deemed that it has no objection to the scheme and a confirmation order shall be issued accordingly.”.

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## D. RESERVE BANK OF INDIA (RBI)

### 1. Notification on Fair Lending Practice- Penal Charges in Loan Accounts

The NCLAT, New Delhi Bench opined that after a charge was To increase reasonableness and transparency in penal interest disclosure, RBI has issued guidelines to the Regulated Entities. Observing that some entities use penal interest over and above the applicable interest rates, some instructions have been issued by RBI for adoption. Some of the instructions are:

- a. Penalty charged for non-compliance of material terms and conditions of loan contract by the borrower shall be penal charged and not penal interest.
- b. Regulated Entities shall not introduce any additional component to the rate of interest.
- c. the applicable penal charges are to be communicated whenever reminders of non-compliance are issued to the borrowers.

The said instructions shall come into force w.e.f. January 01, 2024.

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## **2. Notification on Regulatory Framework for IDF-NBFCs**

To enable the IDF-NBFCs play a greater role in the financing of the infrastructure sector, a review of the guidelines as applicable to IDF-NBFCs was undertaken.

A revised framework has been issued by the RBI and the said guidelines shall come into effect from the date of the circular.

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## **3. Notification on Reset of Floating Interest Rate on Equated Monthly Instalments (EMI) based Personal Loans**

RBI issued guidelines related to Fair practices Code for lenders. In terms of these, the Regulated Entities have the freedom to offer all categories of advances either on fixed or on floating interest rates basis.

Over time, some grievances were received such as improper communication, elongation of loan tenor, increase in the EMI amount etc. therefore, the Regulated Entities are advised to frame appropriate policy framework meeting some requirements. Some of the requirements are:

- a. Regulated Entities shall communicate about the possible impact of change in benchmark interest rate at the time of sanction.
- b. The Sanction letter shall disclose the applicable charges for switching of loans from floating to fixed rate.

The said instructions will also be applicable to all equated instalment based loans.

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## **4. RBI issues Directive: Section 42 (1A)- Requirement for maintaining additional CRR**

RBI has decided to issue a directive that all scheduled commercial Banks/Regional Rural Banks and all scheduled Primary Urban Co-operatives Banks have to maintain with RBI an incremental CRR of 10% on the increase in NDTL.

The I-CRR will be reviewed on September 08, 2023 or earlier.

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## E. REAL ESTATE REGULATORY AUTHORITY (RERA)

### 1. MREAT expounds: Non issuance of commencement certificate not a ground to condone delay

The Maharashtra Real Estate Appellate Tribunal opined that the delay could only be condoned when an aggrieved party intended to file an appeal but due to intervening circumstances could not.

In the present case, it was evident that the Applicant did not intent to file an appeal and only later decided to file one. Further, there were no intervening circumstances which could provide for sufficient cause.

It was expounded that non-issuance of commencement certificate cannot be a ground to condone delay.

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## F. SECURITIES AND EXCHANGE BOARD OF INDIA (SEBI)

### 1. Regulation on Securities and Exchange Board of India (Facilitation of Grievance Redressal Mechanism) (Amendment) Regulations, 2023

SEBI has amended Regulation 9(e) of the Securities and Exchange Board of India (Stock Brokers) Regulations, 1992 and substituted 21 calendar days in place of “one month”.

Similar amendment has been done in Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992; Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993; Securities and Exchange Board of India (Debenture Trustees) Regulations, 1993; Securities and Exchange Board of India (Bankers to an Issue) Regulations, 1994.

The amendments shall come into force on the date of their publication in the Official Gazette.

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## **2. Circular on Procedure for seeking prior approval for change in control with respect to Merchant Bankers and Bankers to an Issue**

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Merchant Bankers and Bankers to an Issue shall obtain prior approval of SEBI in case of change in control as per Regulation 9A(1)(a) of SEBI (Merchant Bankers) Regulations, 1992 and Regulation 8A(1)(a) of SEBI (Bankers to an Issue) Regulations, 1994.

SEBI has introduced a procedure to streamline the process of obtaining approval for the proposed change.

It has been specified that the intermediary shall make an online application to SEBI along with a declaration or an undertaking.

For the matters involving sanction of the National Company Law Tribunal it has been specified that the application shall be first filed with the SEBI.

The circular will come into effect from September 01, 2023.

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## **3. Master Circular on Online Resolution of Disputes in the Indian Securities Market**

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To further the interests of investors and consequent to the notification dated July 03, 2023 of the SEBI (Alternative Dispute Resolution Mechanism) (Amendment) Regulations, 2023, SEBI has decided to streamline the existing dispute resolution mechanism in the Indian securities market.

The scope has been expanded by establishing a common Online Dispute Resolution Portal which harnesses online conciliation and online arbitration for resolution of disputes. Further, any type of disputes between investors/clients and listed companies (including their registrar and share transfer agents) or any of the specified intermediaries/regulated entities in securities market (as specified in Schedule A of the circular) will be resolved in accordance with the present circular.

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#### **4. Circular on Timeline for the Exit Option Window Period for Change in control of AMC**

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Partial modification has been made to Para 17.8.1 (III) of the SEBI Master Circular NO. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023.

In lieu of growth in technological communication which has enabled faster dissemination of information to unitholders, timeline for exit option window period for change in control of AMC was reviewed. The following has been decided by SEBI:

“The unitholders are given an option to exit on the prevailing Net Asset Value without any exit load within a time period not less than 15 calendar days from the date of communication. However, in case of change in control resulting in consolidation or merger of schemes, the unitholders are given an option to exit on the prevailing Net Asset Value without any exit load within a time period not less than 30 calendar days from the date of communication.”

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#### **5. Circular on Simplification of KYC Process and rationalisation of Risk Management Framework at KRAs**

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SEBI has decided to simplify the KYC Process and rationalise the risk management framework. Following has been issued/prescribed:

- a. KYC process shall mean obtaining the proof of identity and proof of address of the client.
- b. Client is allowed to open an account with intermediaries and transact in securities market as soon as the KYC process is completed.
- c. KRAs shall verify the client's mobile number and email id.

The previous circular on the same subject matter dated April 06, 2022 shall stand rescinded from September 01, 2023

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**6. Validity period of approval granted by SEBI to Alternative Investment Funds (AIFs) and Venture Capital Funds (VCFs) for overseas investment**

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AIFs and VCFs have time limit of 6 months from the date of prior approval from SEBI for making the allocated investments in offshore venture capital undertakings.

Considering the recommendations of the Alternative Investments Policy Advisory Committee, it has been decided to reduce the aforesaid time limit for making overseas investments by AIFs/VCFs from 6 months to 4 months.

The circular will apply to the overseas investment approvals granted by SEBI.

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**7. Corrigendum cum Amendment to Circular dated July 31, 2023 on Online Resolution of Disputes in the Indian Securities Market**

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SEBI has modified the circular dated July 31, 2023 providing the guidelines for online resolution of disputes in the Indian Securities Market. Some of the modifications are:

**a. Clause 8 has been substituted as:**

All listed companies / specified intermediaries / regulated entities in the securities market (collectively referred to as "Market Participant/s") shall enrol on the ODR Portal within the timelines as specified at paragraphs 46 and 47 of this circular and shall be deemed to have been enrolled on the ODR Portal at the end such specified timeline. The enrolment process shall also include executing electronic terms/agreements with MIIs and the ODR Institutions, which shall be deemed to be executed at the end such specified timeline. Facility to enrol Market Participants into the ODR Portal by utilising the credentials used for SEBI SCORES portal / SEBI Intermediary portal may be also provided in the ODR Portal.

**b. Clause 20.c**

75% has been substituted with 100%.

**c. Clause 50 has been modified as:**

All matters that are appealable before the Securities Appellate Tribunal in terms of Section 15T of SEBI Act, 1992 (other than matters escalated through SCOREs portal in accordance with SEBI SCOREs Circular), Sections 22A and 23L of Securities Contracts (Regulation) Act, 1956 and 23A of Depositories Act, 1996 shall be outside the purview of the ODR Portal.

The circular shall come into effect immediately.

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## **8. Master Circular for Commodity Derivatives Segment**

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A Master Circular has been issued by SEBI to combine all information pertaining to commodity derivatives market or segment in one place.

The circular will come into force from the date of its issuance.

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## **9. Offer for Sale framework for sale of units of Real Estate Investment Trusts (REITs) and Infrastructure Investment Trusts (InvITs)**

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SEBI has decided to modify the Paragraph B of the SEBI circular dated January 10, 2023 to allow OFS for units of private listed InvITs.

The following is the substituted paragraph:

“B. OFS Framework for sale of units of Real Estate Investment Trusts (REITs) and Infrastructure Investment Trusts (InvITs)

1.0 OFS for sale of units of REITs and InvITs by sponsor(s) or sponsor group entities, and other unitholders are permitted only in units of listed REITs and listed InvITs. The OFS framework for REITs and InvITs shall be equivalent to the OFS framework prescribed at paragraph-A above for equity shares of listed companies.

Provided that in case of OFS for listed InvITs, the trading lot shall be same as the trading lot prescribed for such InvITs in the secondary market in terms of SEBI(Infrastructure Investment Trusts) Regulations, 2014.

Provided further that since there is no participation of retail investors in Private listed InvITs, the provisions related to retail investors as specified in paragraph-A above shall not be applicable in case of OFS for such InvITs and the OFS shall remain open only for one day i.e. T day).”

The circular shall come into effect immediately.

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## **10. Master Circular for Alternative Investment Funds (AIFs)**

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TA master circular has been issued by SEBI to consolidate all circular relating to the regulatory framework of the Alternative Investment Funds (AIFs) to be provided at one place.

It shall come into force from the date of its issuance.

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## **11. Trading Preferences by Clients- Applicability for Commodity Derivatives**

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SEBI has clarified that the format of Trading Preferences as specified under the SEBI Circular dated June 21, 2023 shall not apply to the members registered exclusively with commodity derivatives exchanges.

Such members have to use the format as provided by the previous Forward Markets Commission vide circular dated February 26, 2015.

It has also been clarified that the opting out facility should be provided to new as well as existing clients. A negative consent should be separately obtained from clients in writing.

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## **12. Audit of Firm-Level performance data of Portfolio Managers**

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Portfolio Managers are required to audit firm-level performance data annually and submit the confirmation of compliance within 60 days of the end of each financial year.

To have uniformity, it has been decided that the APMI shall specify the standardized terms of reference for the same.

It shall include the requirement to consider clients' portfolios under all services.

It will be applicable from October 01, 2023.

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### **13. Transactions in Corporate Bonds through Request for Quote (RFQ) Platform by FPIs**

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Certain stipulations have been advised by SEBI to increase the liquidity on RFQ Platform of stock exchanges and to enhance transparency.

It has been decided the FPIs shall undertake minimum 10% of their total secondary market trades in Corporate Bonds by value by placing quotes on the RFQ Platform quarterly.

It will be in effect from October 01, 2023.

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### **14. Facility to remedy erroneous transfers in Demat accounts**

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SEBI has decided that a well-balanced and operational mechanism for exemption from OTP may be provided for reversal of erroneous transfers in Demat accounts.

For this purpose, the Depositories are mandated to constitute an internal and joint committee and examine the erroneous transfers. Hearing should be provided to both the parties, following the principles of natural justice.

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### **15. Industry Standard Forum to facilitate ease of implementation of regulations: Industry Associations take next steps**

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A press release has been issued in the regard that the SEBI has proposed the formation of an Industry Standard Forum for formulating standard of implementation of specific regulations and circulars.

The priority areas have been determined:

- a. Rumour verification requirements
- b. Disclosure requirements under Regulation 30 and 30A of LODR Regulations
- c. BRSR Core/ ESG assurance requirements
- d. Structured Digital Database requirements under PIT Regulations

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**16. Reduction of timeline for listing of shares in Public issue from existing T +6 days to T +3 days**

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SEBI has decided to reduce the time for listing of specified securities after the closure of Public Issue to only 3 working days instead of 6 working days.

The timeline of 3 working days shall be disclosed in the Offer Documents of public issues.

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