

Regulatory Alert

IAs/RAs/MIs/MFs/EDs/RTAs

November 2025 – Vol – 1

1. Ease of doing business measures - Enabling Investment Advisers (“IAs”) to provide second opinion to clients on assets under pre-existing distribution arrangement.

SEBI has observed instances where clients seek a second opinion from Investment Advisers (IAs) on assets that are already under a pre-existing distribution arrangement with another entity. In such cases, SEBI has mandated that IAs may charge a fee on these assets, subject to a maximum limit of 2.5% of the asset value per annum. For more details, [click here](#).

2. Ease of doing business – Interim arrangement for certified past performance of Investment Advisers and Research Analysts prior to operationalisation of Past Risk and Return Verification Agency (“PaRRVA”)

SEBI outlines that prior to PaRRVA’s operational launch, Investment Advisors (IAs) and Research Analysts (RAs) may share the past data only on specific client request, only if the past performance data is certified by a member of ICAI/ICMAI. SEBI also stated that IAs/RAs who wish to communicate the past performance data to clients must enrol with PaRRVA within 3 months of its operations. For more details, [click here](#).

3. Implementation of eligibility criteria for derivatives on existing Non Benchmark Indices.

SEBI issued the circular regarding implementation of new eligibility criteria for derivative contracts on existing Non- Benchmarking Indices (NBIs). The circular outlines the prudential norms, such as minimum constituents’ numbers & weight limits for top constituents that stock exchanges must follow before introducing derivatives on these indices. Additionally, SEBI mandates that stock exchange must undertake constituent or weight adjustments in existing NBIs to achieve compliance. For more details, [click here](#).

4. Specification of the terms and conditions for Debenture Trustees for carrying out activities outside the purview of SEBI.

SEBI has outlined terms and conditions for Debenture Trustees (DT) to carry out activities outside the regulated purview of SEBI. These activities includes a) Assignments under the ambit of any other financial sector regulators specified by SEBI- IRDAI, RBI, IBBI, PFRDA, IFSCA, The Ministry of Corporate Affairs and such other authorities b) Activities that do not fall under the ambit of SEBI or any other financial sector regulator (which shall be fee-based, non-fund, based and pertain to the financial services sector). For more details, [click here](#).

5. Modifications under the International Financial Services Centres Authority (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022.

IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022 specifies that for the purpose of on-boarding of Indian Nationals, the Video based Customer Identification Process or V-CIP may also be carried out by a financial group entity in India supervised by the financial regulator or a KYC Registration Agency. It also lays down the minimum standards for infrastructure, procedure & data management for regulated entities who do V-CIP. For more details, [click here](#).

6. Requirement of Certification on AML/CFT for Designated Director and Principal Officer under the IFSCA (AML/CTF/KYC) Guidelines, 2022.

IFSCA has mandated the need of completion of the course established by IFSCA in collaboration with NISM, namely '*NISM-IFSCA-01: Certification Course on Anti-Money Laundering and Counter-Terrorist Financing in the IFSC*' for all Designated Directors and Principal Officers of all Regulated Entities or REs, within 4 months of their appointment or the date of launch of the course, as applicable . For more details, [click here](#).

7. Inclusion of Platform Service Partner under the National Pension System (NPS) - "NPS e-shramik (Platform Service Partner) Model.

PFRDA has extended NPS to platform Service Partners such as Zomato, Swiggy, Blinkit, Ola, Uber, Urban Company, etc by introducing NPS e-shramik corporate. NPS e-shramik shall include two-phase registration process to be carried out by Platform Service Partners, Platform aggregators/POP. For more details, [click here](#).

8. Corporate Model NPS: Revision in the provisions for exercising choices of Pension Funds and Investment Choices.

PFRDA issues revision in the provision for exercising choices of pension funds which includes either a joint contribution structure – where both employee & employer are contributing or individual contribution for pension by employees (the schemes should be permitted through mutual agreement between both concerned parties) through common scheme framework. For more details, [click here](#).

The above Regulatory alerts may be relevant for the individuals with the following NISM Certification Examinations:

- NISM-Series-I: Currency Derivatives Certification Examination
- NISM-Series-VIII: Equity Derivatives Certification Examination
- NISM-Series-XIII: Common Derivatives Certification Examination
- NISM-Series-VII: Securities Operations and Risk Management
- NISM-Series-X-A: Investment Adviser (Level 1) Certificate Examination
- NISM-Series-X-B: Investment Adviser (Level 2) Certification Examination
- NISM-Series-X-C: Investment Adviser Certification (Renewal) Examination
- NISM-Series-XV: Research Analyst Certification Examination
- NISM-Series-XV-B: Research Analyst Certification (Renewal) Examination
- NISM-Series-XVII: Retirement Adviser Certification Examination
- NISM-IFSCA-01: Certification Course on Anti-Money Laundering and Counter-Terrorist Financing in the IFSC