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COMMUNIQUÉ TO DEPOSITORY PARTICIPANTS

CDSL/OPS/DP/POLCY/2023/578

October 04, 2023

SEBI – CENTRALIZED MECHANISM FOR REPORTING THE DEMISE OF AN INVESTOR THROUGH KRAS

DPs are advised to refer to the SEBI Circular no. **SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/0000000163** dated October 03, 2023, regarding **Centralized mechanism for reporting the demise of an investor through KRAs** [refer Annexure].

DPs are advised to take note of the same.

Queries regarding this communiqué may be addressed to: **CDSL – Helpdesk** Emails may be sent to: helpdesk@cdslindia.com and telephone number 08069144800.

sd/-

Nilesh Shah
Asst. Vice President – Operations

CIRCULAR

SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/0000000163

October 03, 2023

To,

1. KYC Registration Agencies (KRAs),
2. Stock Brokers through Recognized Stock Exchanges,
3. Depository Participants (DPs) through Depositories,
4. Asset Management Companies (AMCs) of Mutual Funds (MFs)
5. Portfolio Managers (PMs)
6. Collective Investment Schemes (CIS)
7. Investment advisors
8. Registrars to an issue and share Transfer Agents (RTAs)
9. Custodians
10. Alternate Investment Funds (AIFs)
11. Infrastructure Investment Trusts (InvITs)
12. Real Estate Investment Trusts (REITs)
13. Recognized Stock Exchanges and
14. Recognized Depositories
15. Listed companies through Recognized Stock Exchanges

Dear Sir / Madam,

Sub: Centralized mechanism for reporting the demise of an investor through KRAs

1. It has been decided to introduce a centralized mechanism for reporting and verification in case of the demise of an investor and thereby smoothen the process of transmission in securities market. This circular spells out the operational norms including the obligations of regulated entities, including registered intermediaries that have interface with 'investors' / 'account holders' (used interchangeably) who are natural persons.
2. Listed companies wanting to provide the beneficial access to such a centralized mechanism to their investors¹ holding securities in physical form, are eligible to establish connectivity with KRA through their RTAs.

Obligation of Intermediary – verification of the death certificate

¹ This facility will be available for investors holding securities in physical form only if their PAN is available in the folio. However, such investors of listed companies that have not opted for KRA connectivity can still avail the beneficial measure of this circular, by dematerializing their securities.

3. Upon receipt of intimation about the demise of an investor from a joint account holder(s) or nominee(s) or legal representative or family member (hereinafter, collectively referred to as '**notifier(s)**', the 'concerned intermediary'² shall obtain the death certificate along with the PAN from the notifier and carry out the following steps;
 - a. Verify the death certificate (to be completed by the next working day of its receipt)
 - i. Online viz. the website of the issuing Government authority, or
 - ii. Offline: OSV ('Original Seen and Verified') process by intermediary

The intermediary shall treat the OSV of the death certificate accompanied with the PAN of deceased investor, received electronically along with the credentials of the notifier (including his / her PAN) and the validation report from an Investor Service Centre (**ISC**) of the Stock Exchange or Depository (**MII**)³, to be on par with its own OSV.

- b. Record and retain self-certified copy of proof of identity, relationship with deceased and contact details of the notifier.
4. If the concerned intermediary, after receiving information about the demise of the investor from the notifier or after inferring⁴ the same, does not have access to or is not in a position to obtain the death certificate, then it shall carry out the following steps;
 - a. Intimate⁵ the investor, notifier(s), or the nominee(s) that the KYC status of the investor has been flagged off as "On Hold" and require them to furnish the death certificate of the concerned investor.
 - b. Upon receipt of the death certificate, the intermediary shall follow the steps as per paragraph 3 above.

Obligation of intermediary - Updation of records in the KRA system by the Intermediary

5. After verification of the death certificate, the concerned intermediary shall (on the same day of verification):

² For the purpose of this circular, the intermediary which receives the intimation of demise of investor or infers it first, is designated as the 'concerned intermediary'.

³ The list of such ISC are available in the websites of the respective MIIs

⁴ Upon receipt of inquiry for transmission or any letter addressed to the investor being returned undelivered with the remark 'deceased' or discovery by the intermediary through re-KYC or Customer Due Diligence done as per its AML / Risk Management practice.

⁵ Use all the contact details of the investor available in its records, including postal address, e-mail address, phone number, mobile & land line numbers and also that of the nominee of the investor, to reach out to the notifier(s) / nominee(s)

- a. Submit a 'KYC modification request' to the KRA that "information on death of investor received; death certificate verified" and also upload the relevant documents⁶
- b. Block⁷ all debit transactions in the account / folios of the deceased investor.

It is noted that for joint accounts, the specified mode of operation should be adhered to, and if the account is operated on Either OR Survivor, or Anyone or Survivor, etc. (i.e. modes other than joint mode), the account operation in such mode shall continue.

- 6. In case the death certificate is not received, the concerned intermediary shall (by the next working day of the intimation):
 - a. Submit a 'KYC modification request' in the KRA system, "information on death of investor received; confirmation awaited".

Obligations of the KRA

- 7. The KRA, upon receipt of 'KYC modification' request from the intermediary as per paragraph 5 above, shall carry out the following steps;
 - a. Independent validation and verification by the next working day of receipt of modification request:
 - i. perform independent validation and verification using details available in its system and source validation / verification wherever feasible
 - ii. contact other linked intermediaries also to check if they have any update in this regard and status of account maintained by them
 - b. Upon validation of the death certificate, the KRA, shall update the KYC record as "Blocked Permanently" in the system and intimate this updation to all linked intermediaries.
 - c. For KYC modification requests received as per paragraph 6 above, the KRA shall flag off the KYC of the investor as "On Hold", and update this status to all linked intermediaries.
 - d. If KRA finds some errors / issues with the modification request as aforesaid, it shall consult with the concerned intermediary and share details of its observations and accordingly update the KYC status to "Modification Rejected and Clear i.e. Validated" or "Blocked Permanently", as the case may be, by the next working day.

⁶ such as the verified death certificate, validation report, credentials of the notifier etc.

⁷ Including blockage of all non-financial transaction requests

- e. The KRAs shall put in place systems, protocols and procedures to operationalize this circular and the same shall be uniform across all KRAs.

Intimation on Transmission of assets of the deceased investor

8. Upon receipt of notification from KRA as “Blocked Permanently”, all intermediaries shall:
 - a. Immediately block all debit transactions in the account / folios of the deceased investor as per paragraph 5 b. above and
 - b. Intimate the notifier / nominee, within 5 days about the procedure for transmission, provide the transmission request form and the list of documents required for the transmission. In case of joint account/s, the intermediary shall intimate the surviving joint account holder(s) as aforesaid.

Transaction request in accounts / folios flagged off as “On Hold”

9. If there is any transaction request received by any intermediary in the account / folio held by it, which is flagged off as “On Hold” as per paragraph 4 or 7, it shall allow the transaction only after conducting additional due diligence as may be appropriate, including through video call with the investor or In-Person Verification (IPV)⁸ which serves to establish that the investor is alive.
10. In case where the information about demise of the investor is proven to be incorrect when the intermediary is able to establish contact with the concerned investor, the intermediary shall submit a ‘KYC modification request’ in the KRA system as, “intimation of death of investor is false” and also upload a report of its additional due diligence to the KRA. This shall be done on the same day in order to avoid any inconvenience to the investor.
11. The KRA shall in turn, revert the status of the KYC to ‘Clear or Validated’ and issue this update to all linked intermediaries, all on the same day.

Other obligation of Intermediaries

12. All intermediaries who have account or folios of investors whose status has been updated as deceased by the KRA, shall submit the data w.r.t. intimation of transmission as per paragraph 8 b. above, and its outcome thereof, to SEBI, in the format as may be prescribed.
13. In order to have uniformity for operationalizing this circular, Stock Exchanges, Depositories and industry associations like Association of Mutual Funds in India (AMFI), Registrars Association of India (RAIN) etc. in consultation with stakeholders including KRAs, may put in place common Standard Operating

⁸ Record of such interaction shall be duly preserved by the intermediary for a period of seven years.

Procedure (**SOP**). The SOP shall be made available on their websites as well as that of the intermediaries.

14. This circular shall come into effect from January 01, 2024.
15. This circular is issued in exercise of the powers conferred under 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.
16. This circular is available on SEBI website at www.sebi.gov.in under the categories "Legal Framework -> Circulars".

Yours faithfully,

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General Manager

Officer of Investor Assistance and Education

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January 2024

Common Standard Operating Procedure (SOP)

for implementation of SEBI circular on

Centralized mechanism for reporting the demise of an investor through KRAs

Version 1.2.1 - 01-Jan-2024

Ref.: SEBI circular ref no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/0000000163 dated October 3, 2023

Intermediaries are requested to write to transmission_help@camsonline.com and submit your feedback and queries on this SOP for consolidation and updates.

Common SOP for reporting the demise of an investor

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Common SOP for reporting the demise of an investor

A: Background

SEBI, in consultation with various stakeholders, has issued guidelines for a centralized mechanism for reporting and verification in case of the demise of an investor and thereby, smoothen the process of transmission in securities market. This circular dated October 03, 2023 spells out the operational norms including the obligations of regulated entities, including registered intermediaries that have interface with 'investors' / 'account holders' (used interchangeably) who are natural persons.

B. Objective

The purpose of this document is to have uniform standard procedures for operationalizing the above referred circular across all securities market stakeholders. This SOP is finalized in consultation with Stock Exchanges, Depositories, industry associations like Association of Mutual Funds in India (AMFI), Registrars Association of India (RAIN), MF registrars, KRAs, Association of Registered Investment Advisers [ARIA], Broker's association, etc. The SOP shall be made available on the respective websites of Stock Exchanges, Depositories, Industry Association as well as that of the intermediaries.

C. Abbreviations

S. No.	Abbreviation	Details
1	AMFI	Association of Mutual Funds in India
2	AML	Anti-Money Laundering
3	API	Application Programming Interface
4	DC	Death Certificate
5	IMPS	Immediate Payment Service
6	IOP	Inter-Operability Process
7	IPV	In-Person Verification
8	ISC	Investor Service Center
9	KRA	KYC Registration Agency
10	KYC	Know Your Customer
11	MII	Market Infrastructure Intermediary
12	OSV	Original Seen and Verified
13	PAN	Permanent Account Number
14	RAIN	Registrars Association of India
15	RTA	Registrar and Transfer Agent
16	RUD	Returned Undelivered
17	SEBI	Securities and Exchange Board of India
18	SOP	Standard Operating Procedure
19	SRI	SEBI Registered Intermediary (including entities regulated by SEBI – Listed Companies)
20	RIA	Registered Investment Advisor

Common SOP for reporting the demise of an investor

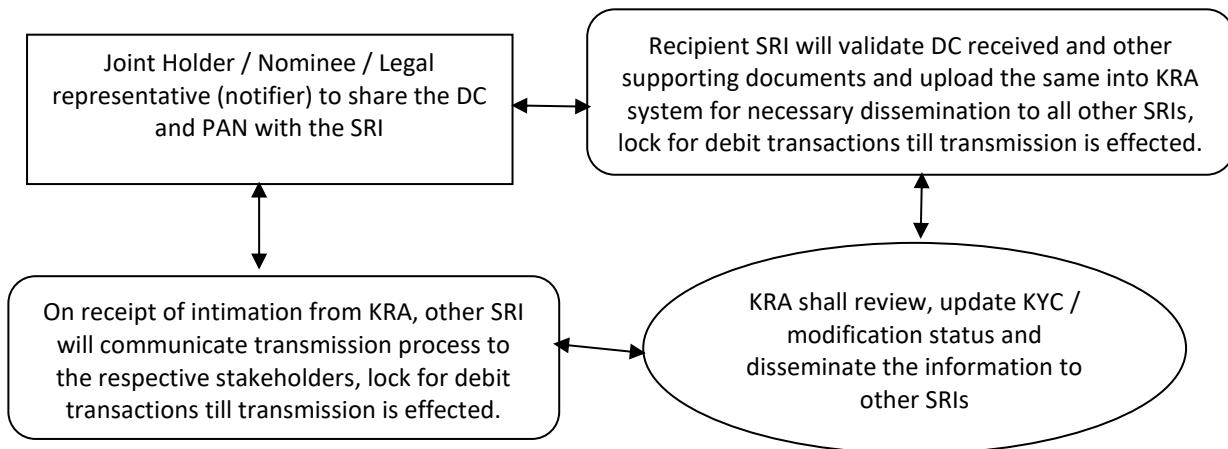
D. Source of demise intimation

1. Intimation from claimant / notifier in the form of transmission request to any of the SRIs or multiple SRIs.
2. Information on demise can be inferred from the following source also
 - a. from banking channels in the form of electronic feeds on payment failure (OR)
 - b. IMPS/penny drop reverse feed (OR)
 - c. Physical documents undelivered with specific reason as 'Consignee Expired (OR)
 - d. Discovery by the intermediary through re-KYC or Customer Due Diligence done as per its AML / Risk Management practice.
3. In cases where the SRI is inferring the demise of client, then it has to take appropriate due diligence as may be necessary, including reaching out to the client / source, while complying with the requirements of the circular.

Documents to be submitted:

Notifier's PAN, Form for registration of death/letter duly signed by the notifier having his name, contact details and address along with the deceased person Death Certificate (in original) or self-attested.

E. Overall Process flow



The responsibility of informing the notifier of the transmission process and documentation shall be as under:

1. Recipient or Concerned SRI (who was first intimated about the same), for those assets that are managed by the specific SRI.
2. All other SRIs on receipt of the unsolicited feeds from the respective KRA for the accounts / folios held by the deceased investor with them.
3. All SRI are independently responsible for this intimation as prescribed above.

Common SOP for reporting the demise of an investor

Steps involved.

- 1) Receipt of demise intimation request at SRI end (T day) from any one of the sources as listed above
- 2) **Review and validation of death certificate by recipient SRI** (irrespective of account status as Active / Inactive / Account Locked / Marked as Defaulter).
- 3) Validation process of death certificate by the recipient SRI shall **include validation of Name of deceased person, Father's name on death certificate (DC) (with father's name received from KRA where it is KYC verified) or Date of birth if available in DC and KYC/SRI records or PAN card copy, where available**, and date of death. SRIs may take additional measures, as felt necessary like **contacting joint holder / nominee / to the contact details available In SRI records**.
- 4) **No investor-initiated transaction signed by deceased holder should have got processed post the date of death.** If any such transaction had taken place after the demise date, recipient SRI should apply additional due diligence as deemed fit at their end and ensure it is not fraudulent transactions or fraudulent connectivity to the deceased person.
- 5) Post validation of DC, recipient SRI to **upload the same with the notifier details to KRA owning the PAN by T+1**, T being date of receipt of information by SRI. If the recipient SRI does not have an arrangement with the specific KRA, they can use IOP through the KRA to raise the modification request to the concerned KRA where such PAN exists.
- 6) **For recipient SRIs - 'T' day is considered where such request is received upto a cut-off time of 3.00 PM by the recipient SRI on any working day.** Any request received thereafter shall be considered as received on the next business day.
- 7) For KRAs - 'T' day is considered where such modification request is uploaded by the recipient SRIs upto a cut-off time 3.00 PM by the recipient SRI on any working day. Any request received thereafter shall be considered as received on the next business day. Refer the KRA SOP annexure at the end of this document.
- 8) SRI shall maintain notifiers information in their records for necessary validations and reference.
- 9) **KRA to facilitate KYC modification request online/offline and in APIs. (T/T+1 day).** Till KRAs build systems to ease upload of document /information by SRI, (scanned copy of the document with details of notifier / source of information, where inferred through bank/RUD etc.,) to be sent to KRAs over email. KRAs may provide designated email id to SRIs for this purpose.
- 10) **KRA system should put soft block on such PANs, based on the intimation from recipient SRI with the above stated reasons. (T/T+1 day).**
- 11) KRAs to create fresh codes for identification of these instances [KRAs can use the existing codes for time being till new codes are developed] and share unsolicited feed to all SRIs who had consumed the PAN.
- 12) Recipient SRI to proceed with transmission process as defined by SEBI / recognized SROs / Trade / Industry Bodies.
- 13) KRA to review the documents uploaded by SRI and validate the same – validation of DC will include validation of Name of deceased person, Father's name on death certificate (DC) (with father's name received from KRA where it is KYC verified) or Date of Birth if available in DC and KYC records (with the assumption that DOB should be same in KYC and SRI records) or PAN card copy, where available), date of death.

Common SOP for reporting the demise of an investor

- 14) If DC is found to be valid, KRA to update the primary KYC status as 'Deactivated due to Death'. (T+1 day) irrespective of KYC status in their records. KRAs to use separate code for this purpose.
- 15) If KRA observes some errors / discrepancies / inadequacy, it shall consult with the recipient intermediary (which has uploaded the demise intimation) and share details of its observations and accordingly update the KYC status to "Modification on hold" or "Deactivated" (as the case may be), on T/T+1 business day to avoid inconvenience to the investors and accordingly recipient SRIs should coordinate with KRA. Hold status of the PAN should continue for instances where KRA is updating status as 'Modification on Hold'. Reason for hold should be mentioned against the KYC status as well, so that SRIs are aware of what is the discrepancy, so that it can be addressed.
- 16) KRA to send unsolicited feeds to all SRIs who have consumed the said PAN. (T+1/2 day) with KYC status as indicated above – this will include "Modification on Hold" instances as well. Reason for hold should be mentioned against the KYC status as well, so that SRIs are aware of what is the discrepancy, so that it can be addressed.
- 17) SRIs can have access to the KYC status information through various modes offered by KRAs as of now – Unsolicited feeds to SFTP folder (OR) Downloading the reporting from KRA system (OR) API mechanism for individual PANs to ascertain the latest KYC status for a PAN.
- 18) Required changes are also to be done by KRA in all APIs/IOP1/IOP2 uniformly across SRIs.
- 19) **On receipt of the unsolicited feed from KRA with PANs having KYC status as "Deactivated - due to Death" or "Modification on Hold", all other SRIs should block all folios identified basis PAN and send the communication as follows:**
 - a. Joint Accounts
 - i. SRI shall issue **communication to the Joint Holder(s)**
 - ii. If this is returned undelivered or unsuccessful (**RUD**), then send communication to the Nominee(s) if registered in the SRI account
 - iii. If there is no nomination or if the address of the nominee(s) is not available or if the communication to nominee(s) is RUD, then send communication to all available contact details of the investor available with the SRI (postal address, email, mobile number etc.).
 - iv. If this communication is RUD, then send communication to the notifier, who is other than joint holder or nominee.
 - b. Single Accounts
 - i. SRI shall issue **communication to the Nominee(s)**
 - ii. If there is no nomination or if the address of the nominee(s) is not available or if the communication to nominee(s) is RUD, then send communication to all available contact details of the investor available with the SRI (postal address, email, mobile number etc.).
 - iii. If this communication is RUD, then send communication to the notifier, who is other than a joint holder or nominee.

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- 20) All SRI should block debit transactions in those accounts including suspension of all transaction in trading account and inactivated/close the UCC in all the stock Exchanges and no investor initiated non-financial transactions should be allowed in such accounts. IDCW payouts should be transferred to Unclaimed schemes if the deceased person is First/Sole Holder in the account as per paragraph 5(b) of SEBI circular dated October 02, 2023.
- 21) As part of claim settlement, SRI to ensure adherence on specified mode of operation i.e., if the account is operated on Either OR Survivor, or Anyone or Survivor, etc. (i.e. modes other than joint mode), the account operation in such mode shall continue.
- 22) If there is any transaction request received by any SRI in the account / folio, which is flagged off as "On-Hold" with the remarks as "Demise intimation", it shall allow the transaction only after conducting additional due diligence as may be appropriate, which may also include video call with the investor or In-Person Verification (IPV) which serves to establish that the investor is alive.
- 23) Record of such interaction shall be duly preserved by the intermediary for a period of seven years.
- 24) If the recipient SRI has marked such account as defaulter / account is locked in various reasons, then such SRI should take additional action as may be required legally, contact the notifier to recover the due amount as applicable.
- 25) Wherever a SRI is taken over by another SRI, appropriate due diligence process shall be applied by the taking over SRI. In such scenario, new SRI shall ensure that investor services and communication in this regard shall not get impacted in any manner.
- 26) If the erstwhile SRI has missed to send out the intimation for any reason, taking over SRI shall identify and take steps to send the intimation and block the accounts/folios accordingly to avoid any fraud.

F. Obligation of Intermediary

1. Receipt of intimation about the demise of an investor from a joint account holder(s) or nominee(s) or legal representative or family member (hereinafter, collectively referred to as 'notifier(s)' or through any other source.
2. Concerned SEBI Registered intermediary [SRI]' [the intermediary which receives the intimation of demise of investor or infers it first through information received from Banks while doing IMPS / penny drop validations etc.], hereafter referred as Recipient SRI, shall obtain the death certificate along with the PAN from the notifier (and preferably with PAN proof of deceased person) and carry out the following steps:
 - a) Verify the death certificate using the following modes by T+1, T being receipt of the request from the notifier:
 - i. Online – through the website of the issuing Government authority, reading QR code on the DC or basis URL found in the certificate, or
 - ii. Offline: OSV ('Original Seen and Verified') by receiving entity/intermediary If verified with originals.

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Recipient SRI shall **prepare the validation report** as per the below defined format (Annexure-1: Demise intimation), **scan the Death Certificate and PAN of the notifier** **preferably with the PAN proof of the deceased person** and **upload the same** into the KRA system / email to designated email id of KRA.

The intermediary shall **treat the death certificate images accompanied (OSV is optional)** with the PAN of deceased investor, received electronically along with the credentials of the notifier (including his / her PAN). If the recipient SRI **verifies with the original DC shown the notifier at the time of submission**, then they may affix OSV to **avoid further delays in action on such instances** (if the SRI or KRA unable to validate through Online mode).

- b) The SRI, which would like to upload such modification request, should have downloaded, or uploaded the KYC record against the said PAN i.e. linked in KRA system against the PAN else, the SRIs need to download/fetch the KYC record against the said PAN and then upload the demise information via KYC modification request as per extant procedure at KRAs for raising KYC modification requests.
- c) The SRIs need to **upload documents in a single pdf file with nomenclature as PAN.pdf** for requests directly uploaded to KRA where the KYC record (PAN) is held.
- d) In case of modification request is uploaded via Interoperability through KRA 2 for a KYC record (PAN) held with KRA 1 then SRIs need to be upload documents in a single zip file with nomenclature as PAN.zip .
- e) In **data field “Any other information” or “XML tag - APP_OTHERINFO** (for API based upload) SRI needs to **incorporate / enter a remark as “Demise Reporting - Verified”** in the **KYC modification request uploaded to KRAs**.
 - 1) **Scanned copy of Death certificate with Original Seen and Verified (OSV) remark bearing initials of SRI official/s if verified with the original shown by the notifier** [OR] **Death Certificate along-with Screenshot of online verification of death certificate bearing initials of SRI official/s (applicable in case where online source verification is done by SRI)**.
 - 2) **Scanned copy of PAN of person (notifier) who informed about demise** of KYC holder to SRI with Original Seen and Verified (OSV) remark [if verified with the original shown by the notifier] with details of SRI officials as mentioned above.
 - 3) **Scanned copy of report of verification carried out by SRI with initials of officials**. Such report may contain details such as contact email ID and mobile number, address of notifier, relationship of notifier with the deceased KYC holder and details of due diligence done by SRI.
 - 4) **Record and retain self-certified copy of proof of identity, relationship with deceased and contact details of the notifier.**
- 3. If the recipient SRI, after receiving information about the demise of the investor from the notifier or after inferring the same through other sources, **does not have access to or is not able to obtain the death certificate, or unable to validate the DC due to mismatch in name of the deceased or date of death etc.** then it shall carry out the following steps:

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- a) Place a block on all account(s) / folio(s) mapped to the PAN including suspension of all transaction in trading account and inactivated/close the UCC in all the stock Exchanges and Intimate to Joint Holder(s)/Nominee(s) wherever available, transfer . Refer the communication format Annexure-2(a), (b), (c) – Intimation to the claimant/notifier.
- b) Use all the contact details of the investor/notifier available in its records, including postal address, e-mail address, phone number, mobile & land line numbers and also that of the nominee of the investor, to reach out to the notifier(s) / nominee(s) the investor, notifier(s), or the nominee(s) that the KYC status of the investor has been flagged off as “On Hold” and require them to furnish the death certificate of the concerned investor.
- c) Upon receipt of the fresh death certificate, the intermediary shall follow the steps as per paragraph 1 above.

4. In case the KYC is on hold and where the information about demise of the investor is proven to be incorrect when the intermediary is able to establish contact with the concerned investor, the intermediary shall submit a ‘KYC modification request’ in the KRA system with Remarks as, “intimation of death of investor is false” and also upload a report of its additional due diligence to the KRA. This shall be done on the same day in order to avoid any inconvenience to the investor.
5. In such cases, in data field Any other information or XML tag - APP_OTHERINFO (for API based upload) SRI needs to incorporate / enter a remark as ‘Intimation of death of investor is false’ in the KYC modification request uploaded to KRAs and upload the additional due diligence report to KRA in a zip file with name PAN.PDF once the modification request is uploaded
6. If the recipient SRI had fetched KYC records from the KRA but since then the account with the intermediary has been closed, still recipient intermediary can accept the intimation, review, and upload the documents into KRA system for further action. Such SRI shall record the KYC status in the said account and restrict further inflows in their accounts.
7. If the recipient SRI has marked such account as defaulter / account is locked in for various reasons, then such SRI should take additional action as may be required legally, contact the notifier to recover the due amount as applicable.
8. Generally, deceased formation is received along with the requisite transmission documents, hence only acknowledgement should be sent and there is no need to specify the documentation requirements.
9. In case of MFRTAs, where transmission / deceased intimation is received for more than one fund at the same time, modification request can be raised once to the KRA system and acknowledgement will be sent for one Fund. Other Funds will send the response after the receipt of the intimation from KRA. If any discrepancies noted, suitable due diligence process will be allowed and notified to the KRA suitably.
10. Transaction restrictions are already in place at MFRTA level where deceased intimation received once updated in MFRTA system will automatically restricts transactions in all other funds serviced by that MFRTA.

G. Updation of records in the KRA system by the recipient SRI

1. After verification of the death certificate and other validation process, the recipient SRI shall (on the same day of verification):

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- a) Submit a 'KYC modification request' to the KRA that "information on death of investor received; death certificate verified" and also upload the relevant documents - *such as the verified death certificate, validation report, credentials of the notifier etc.*
- b) Block all financial and non-financial transactions in the account / folios of the deceased investor in their records including suspension of all transaction in trading account and inactivated/close the UCC in all the stock Exchanges and no investor initiated non-financial transactions should be allowed in such accounts. IDCW payouts should be transferred to Unclaimed schemes if the deceased person is First/Sole Holder in the account as per paragraph 5(b) of SEBI circular dated October 02, 2023

2. SRI to ensure **adherence to specified mode of operation** i.e., if the account is operated on Either OR Survivor, or Anyone or Survivor, etc. (i.e. modes other than joint mode), the account operation in such mode (by the surviving holder(s)) shall continue.
3. In case the **death certificate is not received/available** with them (in case of inferred instance(s)), the recipient SRI shall **(by the next working day)** of the intimation:
4. **Submit a 'KYC modification request'** in the KRA system, "information on death of investor received; confirmation awaited".

H. Obligations of the KRA (*also refer the SOP issued by KRAs and appended at the end of this document*).

1. The KRA, upon receipt of 'KYC modification' request from the intermediary as per process prescribed above, shall carry out the following steps:
 - a) On upload of KYC modification request from the recipient SRI with remarks as Demise intimation, KRA system will make the KYC status as 'On-Hold' with remarks as "**Demise Reporting - Pending Verification**" irrespective of KYC status in their records as of now.
 - b) Disseminate the information to all SRIs who have consumed the said PAN through unsolicited feeds or through IOPs/APIs.
 - c) Independent validation and verification by the next working day of receipt of modification request:
 - i. perform independent validation and verification using details available in its system and source validation / verification wherever feasible.
 - ii. contact other linked intermediaries also to check if they have any update in this regard and status of account maintained by them.
 - d) Upon successful independent validation of the death certificate, the KRA shall update the KYC status as "Deactivated" in the system.
 - e) If KRA finds some errors / issues with the modification request as aforesaid, KRA will consult with the recipient SRI intermediary and share details of its observations and accordingly update the KYC status to "Modification on Hold" or "Deactivated", as the case may be, by the next working day.
 - f) KRA to trigger unsolicited feeds to all intermediaries who had consumed the PAN post marking of KYC status as "Modification on Hold" or "Deactivated Permanently".

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g) KRAs to build system for re-activation of PANs that are “On-Hold” with remarks ‘due to death’ if the information found to be false and should be made at the earliest within ‘T’ day to avoid inconvenience.

I. Intimation on Transmission of assets of the deceased investor

Upon receipt of notification from KRA as “Deactivated”, all SRIs shall:

- a) Immediately block all debit transactions in the account / folios of the deceased investor including suspension of all transaction in trading account and inactivated / close the UCC in all the stock Exchanges and no investor initiated non-financial transactions should be allowed in such accounts. IDCW payouts should be transferred to Unclaimed schemes if the deceased person is First/Sole Holder in the account as per paragraph 5(b) of SEBI circular dated October 02, 2023
- a) Need for blocking credit transactions will be reviewed after reviewing the process for 2-3 months.
- b) SRIs may review such transactions and can decide to refund or restrict such inflows. Respective industry body association can issue directions suitably from their end.
- c) Regarding the intimation requirements, please refer point no. E-18 above. Refer Communication format Annexure -3 – Intimation on Transmission.

J. Transaction request in accounts / folios flagged off as “On Hold”

- 1) If there is any transaction request received by any intermediary in the account / folio held by it, which is flagged off as “On-Hold-Demise intimation received”, it shall allow the transaction only after conducting additional due diligence as may be appropriate, which may include video call with the investor or In-Person Verification (IPV) which serves to establish that the investor is alive. Record of such interaction shall be duly preserved by the intermediary for a period of seven years.
- 2) In case where the information about demise of the investor is proven to be incorrect when the intermediary is able to establish contact with the concerned investor, the intermediary shall submit a ‘KYC modification request’ in the KRA system as, “intimation of death of investor is false” and also upload a report of its additional due diligence to the KRA. This shall be done on the same day in order to avoid any inconvenience to the investor.
- 3) The KRA shall in turn, revert the status of the KYC to ‘Clear or Validated’ and send the unsolicited feed with the updated status to all linked SRIs on the same day.

K. Other obligation of Intermediaries

- 1) All intermediaries who have account or folios of investors whose status has been updated as deceased by the KRA, shall submit the data w.r.t. intimation of transmission as per the process defined above, and its outcome thereof, to SEBI, in the format as may be prescribed (Refer Annexure-4 – Reporting format of SEBI on Demise intimation).
- 2) Listed companies wanting to provide the beneficial access to such a centralized mechanism to their investors (having valid PAN) holding securities in physical form, are eligible to establish connectivity with KRA through their RTAs.

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L. Communication draft format

Draft Letter/Email/SMS format has been specified below under various scenarios and intermediaries should stick to this communication format with minor changes on the listing of documentation requirements.

1. Annexure-1 – Letter / Email Format - Intimation of Demise information by the Joint Holder(s) / Nominee(s).
2. Annexure-2a – Letter/Email Format - Intimation by recipient SRI to the notifier – Joint Holder(s) / Registered Nominee(s) / to all contact details of the deceased investor / Notifier (other than joint holder or nominee).
3. Annexure-2b – SMS Format - Intimation by recipient/other SRI to the notifier – Registered Nominee(s) / Joint Holder(s).
4. Annexure-2c – SMS Format - Intimation by recipient/other SRI to the notifier – other than Registered Nominee(s) / Joint Holder(s).
5. Annexure-3 – Letter & E-mail Format - Intimation by other SRI(s) Joint Holder(s) / Registered Nominee(s) / All Contact details of the deceased investor / Notifier (other than joint holder or nominee).
6. Annexure-4 – Reporting format of SEBI on Demise intimation.

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Annexure-1 – Letter / Email Format - Intimation of Demise information by the Joint Holder(s) / Nominee(s).

Date:

<Name of SRI>
<Address>.
<City> - <Pincode>

Dear Sir/Madam,

Sub.: Intimation of demise information.
Ref.: PAN _____ & Folio/Account Number: <Folio>/Account Number

I/We regret to inform you about the demise <Name of the deceased person> having the above PAN / Folio / Account, where I/We is/are the joint holder(s) / registered nominee(s) in the accounts maintained with your organisation / entity. Original downloaded / self-attested copy of the Death Certificate is attached for your kind action. I/We am/are enclosing the self-attested copy of deceased person for PAN or any other valid ID proof for necessary validation.

Please let us know the procedure and documentation requirements to transmit the units in my/our favour. Also, note my/our contact details for necessary communication / contacts in this regard and not for updation in KYC records or in any of the accounts.

Details	Joint Holder1 / Nominee1	Joint Holder2/ Nominee2	Nominee3
Name			
PAN			
Mobile			
Email			
Address			

I/We acknowledge and confirm that the information provided above is true and correct to the best of my/our knowledge and belief. In case any of the above specified information is found to be false or untrue or misleading or misrepresenting, I/We am/are aware that I/We may be liable for it for any fines or consequences as required under the respective statutory requirements. . I/We hereby authorize you to disclose, share, rely, remit in any form, mode, or manner, all / any of the information provided by me, including all changes, updates to such information as and when provided by me to any of the KYC Registration Agency(ies) for necessary action.

Signature:

Joint Holder1 / Nominee1	Joint Holder2 / Nominee2	Nominee3
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Encl.: Death certificate – Original downloaded or self-attested copy.
PAN or other ID proof of Deceased person – self-attested copy.
My/our self-attested PAN card copy(ies) or any other self-attested valid ID proof.

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Annexure-2a – Letter/Email Format - Intimation by recipient SRI to the notifier – Joint Holder(s) / Registered Nominee(s) / to all contact details of the deceased investor / Notifier (other than joint holder or nominee)

(Separate letter should be sent by the recipient SRI to each of the Nominee(s) wherever applicable).

Date:

<Name of Nominee(s)/Joint Holder(s)>
<Address>, <City> - <Pincode>

Dear Sir/Madam,

Sub.: Acknowledgement of receipt of demise information.
Ref.: Deceased person PAN _____ **<Masked>**
Folio/Account Number: <Folio>/<Account Number>

We are sorry to hear the sad demise of <Name of the deceased person> having the above PAN / Folio / Account held with us.

We acknowledge the receipt of the demise intimation and have reviewed the documentation submitted. After due validation, we have uploaded the demise intimation in the KRA system and you will be receiving information from the respective SEBI registered intermediaries where the deceased PAN exists in their system. Please submit the following information / documents to us for further processing at our end.

- a) Transmission Request Form (Form **xx**) for Transmission of Units in favour of the Nominee(s).
- b) Self-attested Copy of Birth Certificate in case the Nominee is a minor.
- c) Self-attested Copy of PAN Card of the Nominee(s) / Guardian (in case the Nominee is a minor)
- d) KYC Acknowledgment OR KYC Form of the Nominee(s) / Guardian (where Nominee is a Minor)
- e) Cancelled cheque with the Nominee's name pre-printed OR Copy of the Nominee's recent Bank Statement/Passbook (which is not more than 3 months old).
- f) If the transmission amount is upto ₹2 Lakh, Nominee's signature should be attested by the Bank Manager in the prescribed format.
- g) In case the Nominee is a Minor, signature of the Guardian (as per the bank account of the Minor or the joint account of the Minor with the Guardian) shall be self- attested.
- h) **<SRI can add any other documentation requirements as defined by the industry association>**.

On receipt of the above documents, we will scrutinize the same. If the information / documents are found to be in order as per the stated requirements, we will process the same at our end appropriately and confirm the action taken through separate communication. If needed, we may seek additional information/documents apart from what is stated above and you need to oblige for the same for processing.

In case if you feel that this information is not correct, please feel free to contact to our transmission helpdesk <Email>/<Contact Number> or our toll-free Call Center <toll free number> or write to <customer support email id> or contact our branches or Distributor.

Thanking you,

For <SRI>

Authorized Signatory.

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Annexure-2b – SMS Format - Intimation by recipient/other SRI to the notifier – Registered Nominee(s) / Joint Holder(s).

Dear notifier, we acknowledge the receipt of the sad demise intimation for PAN **XXXXX1234X** holder through you/KRA and separate letter communication is sent on further requirements. Please do the needful on receipt. <Name of the SRI>.

Annexure-2c – SMS Format - Intimation by recipient/other SRI to the notifier – other than Registered Nominee(s) / Joint Holder(s).

Dear notifier, we acknowledge the receipt of the sad demise intimation for PAN **XXXXX1234X** holder through you and separate letter communication is sent on further requirements to the respective persons available in our records. <Name of the SRI>.

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Annexure-3 – Letter & E-mail Format - Intimation by other SRI(s) Joint Holder(s) / Registered Nominee(s) / All Contact details of the deceased investor / Notifier (other than joint holder or nominee)

(Separate letter should be sent by the recipient SRI to each of the Nominee(s) wherever applicable).

Date:

<Name of Nominee(s)>

<Address>

<City> - <Pincode>

Dear Sir/Madam,

Sub.: Acknowledgement of receipt of demise information.

Ref.: Deceased person PAN _____ (masked PAN)

Folio/Account Number: <PAN>/<Folio>/Account Number>

Based on the information received from the KRA, we are sorry to hear the sad demise of <Name of the deceased person> having the above PAN / Folio / Account held with us.

We have scrutinized the information received from KRA and have noted that you are the registered nominee in the account held by us. Please submit the following information / documents to us for further processing at our end.

- a) Transmission Request Form (Form xx) for Transmission of Units in favour of the Nominee(s).
- b) Self-attested Copy of Birth Certificate in case the Nominee is a minor.
- c) Self-attested Copy of PAN Card of the Nominee(s) / Guardian (in case the Nominee is a minor)
- d) KYC Acknowledgment OR KYC Form of the Nominee(s) / Guardian (where Nominee is a Minor)
- e) Cancelled cheque with the Nominee's name pre-printed OR Copy of the Nominee's recent Bank Statement/Passbook (which is not more than 3 months old).
- f) If the transmission amount is upto ₹2 Lakh, Nominee's signature should be attested by the Bank Manager in the prescribed format.
- g) In case the Nominee is a Minor, signature of the Guardian (as per the bank account of the Minor or the joint account of the Minor with the Guardian) shall be self-attested.
- h) **<SRI can add any other documentation requirements as deemed necessary>**.

On receipt of the above documents, we will scrutinize the same. If the information / documents are found to be in order as per the stated requirements, we will process the same at our end appropriately and confirm the action taken through separate communication. If needed, we may seek additional information/documents apart from what is stated above and you need to oblige for the same for processing.

In case if you feel that this information is not correct, please feel free to contact to our transmission helpdesk <Email>/<Contact Number> or our toll-free Call Center <toll-free number> or write to <customer support email id> or contact our branches or Distributor.

Thanking you,
For <SRI>

Authorized Signatory.

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Annexure-4 – Reporting format of SEBI on Demise intimation

Data to be Maintained / Provided by 'Concerned' SRI

Data for the period: dd-mmm-yyyy to dd-mmm-yyyy

Item	Count
Instances where the demise of investor (client) is reported by notifier	
Instances where the demise of investor (client) is inferred by the SRI	

Instance	Date of reporting of / inferring demise	Date of seeking DC from notifier	Date of Verification of DC	Date of intimating KRA*	Date of freezing the Account / Folio**	Date of intimating notifier about Transmission
1						
2						
N						

DC: Death Certificate

* "information on death of investor received; confirmation awaited" or "information on death of investor received; death certificate verified", as the case may be.

** Debits

Data to be Maintained / Provided by 'Other' SRI

Data for the period: dd-mmm-yyyy to dd-mmm-yyyy

Item	Count
Instances where the status of your client is updated as "On-Hold" in the KRA system	
<ul style="list-style-type: none"> Of the above, instances where the status of your client is updated as "On-Hold" in the KRA system, where you have done VC/ IPV upon receipt of transaction request Of the above VC / IPV, how many instances found to be false (wrong death reporting) 	
Instances where the status of your client is updated as "Deceased" in the KRA system	

Instance	Date of Updation of status in KRA system*	Date of freezing the Account / Folio**	Date of intimating notifier about Transmission**
1			
2			
3			
N			

DC: Death Certificate

* about "On-Hold" / "Deceased". ** only if the status is updated as "Deceased"

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SOP issued by KRAs to all SRIs for reference and actions thereof (which may be subject to change and separately communicate to all SRIs registered with them).

Standard Operating Procedure (SOP) issued by all KRAs to SEBI Registered Intermediaries (SRIs) for implementation of SEBI circular ref no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/0000000163 dated October 3, 2023 at KRAs

1. The SEBI Registered Intermediaries (SRIs) are required to upload the KYC modification request/s to KRAs for reporting demise / death of the investor.
2. The SRI which would upload such request should have downloaded or uploaded the KYC record against the said PAN i.e., linked in KRA system against the PAN else, the SRIs need to download/fetch the KYC record against the said PAN and then upload the demise information via KYC modification request as per extant procedure at KRAs for raising KYC modification requests.
3. Documents to be uploaded by SRI after upload of KYC modification request would be as below for reporting death / demise of holder of KYC record in KRA system where Verification is done at SRI end of the death certificate. The SRIs need to upload documents in a single pdf file with nomenclature as **PAN.pdf** for requests directly uploaded to KRA where the KYC record (PAN) is held.

In case of modification request is uploaded via Interoperability through KRA 2 for a KYC record (PAN) held with KRA 1 then SRIs need to be upload documents in a single zip file with nomenclature as **PAN.zip**

In data field “Any other information” or “XML tag - APP_OTHERINFO (for API based upload)” SRI needs to incorporate / enter a remark as **“Demise Reporting - Verified”** in the KYC modification request uploaded to KRAs.

- a) Scanned copy of Death certificate with Original Seen and Verified (OSV) remark bearing initials of SRI official/s.

OR

Death Certificate along-with Screenshot of online verification of death certificate bearing initials of SRI official/s (applicable in case where online source verification is done by SRI).

- b) Scanned copy of PAN of person (notifier) who informed about demise of KYC holder to SRI with Original Seen and Verified (OSV) remark with initials of SRI officials.

OR

Scanned copy of Proof of Identity (POI) of person (notifier) who informed about demise of KYC holder to SRI with Original Seen and Verified (OSV) remark with initials of SRI officials. The POI any one of the Officially Valid Documents (OVDs) as specified under Prevention of Money Laundering Rules.

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c) **Scanned copy of report of verification carried out by SRI with initials of officials.** Such report may contain details such as contact email ID and mobile number, address of notifier, relationship of notifier with the deceased KYC holder and details of due diligence done by SRI.

4. KRA will process the modification request on T plus next working day, where T is the date of upload of the modification request with necessary documents for demise. The independent verifications that will be done by KRA are provided below :-

- Online verification of death certificate wherever applicable/ enabled.
- Informing the other SRIs mapped with the KYC record to inform about Demise request and seek inputs, if any
- Any other verifications which KRA may deem necessary such as contacting on mobile number as registered in KYC record or contacting the notifier in order to process the KYC modification request of demise / death of KYC holder.

5. The KYC modification request as in Sr no 3 above with requisite documents will be processed by the KRA maker checker and in case if all documents are found to be in order and after verifications at KRA as below the said record will be marked as KYC Deactivated with reason as **Demise of KYC holder.**

In case any discrepancies are observed, the status of the KYC modification request will be marked as **“On hold”** and Remark would be suitably provided in such request to display the discrepancy observed by KRA in the same. **SRIs will be required to clear such discrepancy so that the KYC modification request is taken up at KRA for reprocessing.**

6. If the concerned SRIs, after receiving information about the demise of the investor from the notifier or after inferring the same, does not have access to or is not in a position to obtain the death certificate, then it shall upload KYC modification request for reporting death / demise of holder of KYC record in KRA system where Verification is not done at SRI end of the death certificate.

In data field Any other information or XML tag - APP_OTHERINFO (for API based upload) SRI needs to incorporate / enter a remark as **“Demise Reporting - Pending Verification”** in the KYC modification request uploaded to KRA.

The documents as in 3b to 3c as above will have to be uploaded by SRI after upload of KYC modification request for reporting death / demise of holder of KYC record in KRA system with nomenclature as provided in Sr no 3 above.

7. The KYC modification request will be marked On Hold at KRA system for such requests as in Sr no 6 above with remarks as **“Demise Reporting - Pending Verification”**. **Once the SRI is in receipt of death certificate, it needs to verify the same and upload the documents as in Sr no 3a to 3c above post which the said request will be taken up for reprocessing at KRA end and steps as per Sr no 4 and 5 will be taken at KRA end.**

8. The updated status of KYC record will be communicated to SRIs as part of unsolicited feed through KRA system and via email to email IDs of SRIs (as recorded with KRA) to which the KYC record is mapped. **SRIs are required to take further actions as per the SEBI Circular and SOP from MIIs (Market Infrastructure Intermediaries) in this regard.**

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9. With reference to point no 10 of abovesaid SEBI circular which states that , *"In case the KYC is on hold and where the information about demise of the investor is proven to be incorrect when the intermediary is able to establish contact with the concerned investor, the intermediary shall submit a 'KYC modification request' in the KRA system with Remarks as, "intimation of death of investor is false" and also upload a report of its additional due diligence to the KRA. This shall be done on the same day in order to avoid any inconvenience to the investor.*

In such cases, in data field Any other information or XML tag - APP_OTHERINFO (for API based upload) SRI needs to incorporate / enter a remark **as Intimation of death of investor is false** in the KYC modification request uploaded to KRAs and upload the additional due diligence report to KRA in a zip file with name **PAN.PDF** once the modification request is uploaded

10. **The details of PANs which are marked Deactivated by KRAs for demise / death of KYC holder will be intimated to stock exchanges and depositories** (jointly termed as MIIs) as per extant process which is functional/operational under consultation with SEBI for initiating steps to limit market access to such investors by MIIs.

11. SRIs are requested to take note of the other directions with regard to obligations casted on SRIs vide SEBI circular ref no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/0000000163 dated October 3, 2023 and take steps to comply with the same.

12. In case of any further assistance and clarifications, please contact _____ (Name of KRA) on _____ (email IDs) and _____ (phone numbers)