

GIFT

December 2025 | Volume 01

# BROKERS

## INSIGHT

**GBA:**

Uniting GIFT City's  
Broking Future

Connecting India's  
**Financial Gateway**  
to the World

Policy,  
People &  
Progress

A publication by



Gift Brokers Association



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# Message from the President's Desk

## Mr. Nitesh Jaiswal

President & Chairman, Gift Brokers Association (GBA)



It gives me immense pleasure to share this message on behalf of the Gift Brokers Association (GBA) — an organization built with the collective vision of strengthening the capital market ecosystem within GIFT City and ensuring that our financial hub stands shoulder to shoulder with leading global financial centres.

GBA was established to represent the unified voice of brokers, intermediaries, and market participants operating within GIFT IFSC. As the ecosystem expands, collaboration and alignment among regulators, exchanges, depositories, and industry stakeholders become vital to achieving long-term growth and sustainability. GBA serves as that bridge — connecting policy with practice, ideas with execution, and innovation with opportunity.

At the core of our efforts lies a commitment to advocate for stable, competitive, and efficient capital markets — markets that not only support India's economic ambitions but also inspire global confidence. Through structured consultations with IFSCA, exchanges, and depositories, GBA continues to contribute towards policy development, operational efficiency, and a more enabling business environment.

We take pride in driving industry consensus and constructive dialogue, focusing on issues that matter most to our members — be it operational ease, policy clarity, or fostering cross-border participation. Our initiatives include consultations with regulators, development of uniform industry standards, and advocacy through white papers and position notes that reflect the collective strength and clarity of one industry voice.

In alignment with the broader vision of GIFT IFSC, GBA also works closely with IFSC-based exchanges and depositories to promote international best practices and ensure global representation of India's growing financial ecosystem. We firmly believe that GIFT City's success will depend on how seamlessly we can integrate with the world — not just through regulation and technology, but also through shared values of transparency, trust, and innovation.

As we move forward, our focus will remain on promoting ease of doing business, encouraging innovation, and creating a collaborative environment where all stakeholders can thrive. The journey of GIFT City is still in its early chapters, but with collective commitment and a unified approach, we are confident of writing a success story that resonates globally.

On behalf of GBA, I extend my sincere gratitude to the International Financial Services Centres Authority (IFSCA), IFSC-based Exchanges, Depositories, Capital Market Intermediaries, and the GIFT City Authorities for their support. Your partnership has been instrumental in shaping GBA's journey and strengthening the foundation of the GIFT IFSC ecosystem.

Together, we are not only shaping the future of GIFT City — we are building the foundation for India's emergence as a global financial powerhouse.

Warm regards,

**Nitesh Jaiswal** - President & Chairman **Gift Brokers Association (GBA)**

# Gift Brokers Association (GBA): Uniting the Voice of GIFT City's Broking Community

## The Birth of GBA

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In every leading financial center across the world, there exists a representative body that brings together intermediaries, brokers, and market participants — organizations that promote dialogue, strengthen collaboration, and drive industry growth.

Both in India and internationally, several such organizations such as **ANMI, BBF, CPAI, FIA, ASIFMA**, and others have played pivotal roles in shaping their respective market ecosystems through engagement, advocacy, and knowledge-sharing.

Within **GIFT City (Gujarat International Finance Tec-City)** — India's ambitious and rapidly growing international financial hub — there existed a similar need. Despite the presence of active broking firms, trading and clearing members, and market intermediaries, there was no unified forum to represent their interests, facilitate coordination, and engage constructively with the International Financial Services Centres Authority (IFSCA) and other stakeholders.

Recognizing this gap, **Mr. Nitesh Jaiswal**, a seasoned market professional with over two decades of experience in financial markets, envisioned the creation of an independent, professional, and forward-looking platform — one that would not only represent the broking community of GIFT City but also align with global best practices to build a world-class financial ecosystem within India.

Thus, the **Gift Brokers Association (GBA)** was born — an association by the brokers, for the brokers, dedicated to strengthening GIFT IFSC's position as a competitive global financial center.

## The Purpose Behind GBA

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The founding philosophy of GBA is simple yet powerful:

“To be the central voice of trading and clearing members at GIFT IFSC — driving innovation, transparency, and inclusive growth in capital markets through constructive engagement with regulators, exchanges, and stakeholders.”

**The association was established with the following objectives:**

- **Representation:** To represent the collective interests of GIFT IFSC-based trading and clearing members before IFSCA, exchanges, depositories, and other relevant authorities.
- **Policy Advocacy:** To actively participate in consultations and contribute to the policy-making process that impacts members and the wider GIFT IFSC ecosystem.
- **Regulatory Feedback:** To provide structured feedback on regulatory frameworks, propose practical suggestions to simplify business operations, support new product introductions, and adopt global standards.
- **Knowledge & Capacity Building:** To organize seminars, webinars, and training programs on emerging trends, compliance, and risk management — helping members stay informed and competitive.
- **Ecosystem Collaboration:** To work closely with IFSC-based exchanges, depositories, and financial market institutions, ensuring a cohesive and efficient operating environment.
- **Global Representation:** To establish GBA as a globally recognized body that collaborates with international associations such as FIA and ASIFMA, ensuring representation for GIFT IFSC at international platforms, in alignment with GIFT City's vision of becoming a leading global financial hub.



## Advocating Growth, Stability, and Global Competitiveness

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GBA advocates stable, competitive, and efficient capital markets that are essential to support the region's economic growth.

The association drives consensus, advocates solutions, and effects change around key industry issues through the collective strength and clarity of one industry voice.

Its initiatives include:

- **Consultations with regulators and exchanges** on policies impacting trading members and intermediaries.
- **Development of uniform industry standards** to promote consistency and operational efficiency.
- **Policy advocacy through discussion papers and recommendations**, aimed at enhancing market vibrancy and transparency.
- **Ease of doing business initiatives** to attract global participants and streamline processes in the GIFT IFSC ecosystem.

By championing these goals, GBA seeks to create an environment that not only supports innovation and inclusion but also ensures long-term resilience and investor confidence in India's first international financial center.

## Building a Culture of Collaboration

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One of the hallmarks of GBA has been its active and consistent engagement.

Through regular **monthly member** meetings, the association has built a strong culture of dialogue and participation.

These meetings serve as a collaborative platform for:

- Sharing **market updates, industry developments, and regulatory insights**.
- Discussing **policy consultations** and preparing collective feedback for submission to IFSCA and other authorities.
- Exploring opportunities for **new products, cross-border initiatives, and operational enhancements**.
- Promoting **peer learning and cooperation** among members, creating a sense of shared ownership and responsibility.

Every meeting is another step toward reinforcing **GBA's credibility and influence** — building a unified, knowledgeable, and globally aware broking community within GIFT City.

## Our Activities and Key Initiatives

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Since its inception, GBA has remained deeply engaged with both industry participants and regulators, playing an active role in shaping the development of India's international financial market framework.

Some of GBA's key initiatives include:

- **Industry Consultations:** Actively contributing to discussions on regulatory and operational frameworks impacting intermediaries and brokers in GIFT IFSC.
- **Representation:** Regularly presenting collective views and recommendations of its members to IFSCA, exchanges, and depositories.
- **Monthly Member Meetings:** Serving as a forum for open dialogue on developments, challenges, and opportunities across the ecosystem.
- **Networking & Knowledge Events:** Hosting sessions to promote knowledge exchange among brokers, clearing members, and financial intermediaries.
- **Policy Advocacy:** Providing inputs on simplifying business processes, supporting innovation, and strengthening investor confidence.
- **Collaborative Engagement:** Working closely with NSE IX, India INX, and other IFSC-based institutions to ensure smoother market operations and growth of the ecosystem.

Every initiative reflects GBA's mission to ensure that GIFT City's **broking ecosystem stands shoulder to shoulder with leading international financial centers** like Singapore, London, and Dubai.

## The Road Ahead

GBA's journey has just begun — but its roadmap is ambitious and purpose-driven. Under the **leadership and vision of Mr. Nitesh Jaiswal**, the association is poised to play a defining role in shaping the future of India's international financial ecosystem.

**Key focus areas for the road ahead include:**

- **Deepening engagement with IFSCA, exchanges, and international regulatory forums.**
- **Strengthening collaboration among members** to foster a culture of partnership and shared growth.
- **Driving policy recommendations** that make GIFT IFSC globally competitive and investor-friendly.
- **Expanding global outreach and representation**, ensuring GBA members' voices are heard on international platforms.
- **Hosting flagship conferences, seminars, and capacity-building programs** to promote continuous learning and innovation.
- **Partnering with IFSC-based exchanges and depositories** to ensure seamless coordination and development of a robust market infrastructure.

With a strong foundation, growing membership base, and shared vision, GBA is on track to become the voice and strength of the broking industry in GIFT City, contributing meaningfully to India's aspiration of being a global financial powerhouse.

## Quote from the Chairman

**Mr. Nitesh Jaiswal**

Chairman & President, Gift Brokers Association (GBA)

"GIFT City is swiftly emerging as a global hub for financial services. The Gift Brokers Association was founded to unite trading and clearing members under one voice — fostering collaboration, transparency, and innovation within the GIFT IFSC ecosystem.

At GBA, our goal is to serve as a bridge between regulators, exchanges, and market participants, ensuring meaningful dialogue and alignment with global best practices.

Our mission is to make every member's voice count and every step contribute to GIFT IFSC's global success."

"Our mission is to ensure every member's voice is heard and every initiative contributes to GIFT IFSC's rise as a global leader."





# Message from the Desk of IFSCA Chairperson

## Shri. K. Rajaraman

Chairperson, International Financial Services Centres Authority (IFSCA)

It gives me immense pleasure to extend my greetings and best wishes to the Gift Brokers Association (GBA) on the occasion of its first Semi Annual Magazine. The establishment of the GBA marked a significant milestone in the evolution of the GIFT IFSC ecosystem - one that symbolizes collaboration, industry participation, and collective vision towards building a world-class international financial centre in India.

The International Financial Services Centres Authority (IFSCA) was constituted with a clear mandate -to develop and regulate the financial services market in the IFSC. Our vision is to position GIFT IFSC as a leading well-regulated global financial centre with stable, efficient and sustainable financial markets and technology ecosystem.

In pursuit of this vision, IFSCA continues to focus on enabling globally aligned policies; adopting international best practices in regulation and governance; ensuring stable, transparent, and investor-friendly markets; fostering innovation in financial products and technology; enhancing ease of doing business to global standards; and facilitating capital and financial services needs for Viksit Bharat @2047.

As India moves towards becoming a global economic powerhouse, the GIFT IFSC will serve as a critical enabler of that transformation by channeling global capital flows into India

through an efficient, well-regulated, and globally integrated platform. The role of market participants and industry associations such as GBA is integral to this vision.

In line with the vision of Government of India, the capital market ecosystem in the IFSC can play an important role in acting as a gateway for connecting India with the world. In this context, several initiatives have been taken by IFSCA such as listing of securities (including ESG labelled bonds), implementation of GIFT NIFTY Connect, facilitating remote trading participants, Global Access reforms etc.

GBA, as the unified voice of brokers & market participants in GIFT IFSC, will play an important role in fostering dialogue, sharing insights, and providing structured feedback on policy and operational frameworks. Such proactive engagement strengthens the collaborative relationship between the regulator and the industry - a relationship built on trust, transparency, and shared objectives. I would urge the members of GBA to come out with ideas for new policy reforms to further develop the capital market ecosystem in the IFSC. I am confident that as GIFT City continues to evolve, GBA will also play an increasingly important role in promoting professional standards and business ethics, strengthening governance and building investor confidence.

I also would encourage GBA to create technical working groups to discuss technology options, standards of information disclosures on products and risks and work towards high standards of investor protection in GIFT IFSC.

On behalf of IFSCA, I congratulate the Gift Brokers Association and all its members for their continued commitment and contributions to the GIFT ecosystem.

I wish the Association continued success in all its endeavours.

Warm regards,

K. Rajaraman - Chairperson | International Financial Services Centres Authority (IFSCA)



# Message from the Desk of Managing Director & Group CEO, Gift City



## Mr. Sanjay Kaul

Managing Director & CEO,  
Gujarat International Finance Tec-City (GIFT City)

It gives me great pleasure to share this message for the inaugural edition of the GIFT Brokers Association (GBA) Semi-Annual Magazine. The launch of this publication marks an important milestone for the capital markets ecosystem within GIFT City and reflects the growing maturity and collaborative spirit across market participants.

GIFT City was envisioned as India's flagship international financial centre an integrated financial and technology hub that brings together world-class infrastructure, progressive regulation, and a seamless operating environment. Over the years, GIFT City has steadily built a robust ecosystem that enables cross-border finance, fosters innovation, supports high-value services, and creates opportunities for global and domestic institutions.

A key strength of GIFT City's progress has been its ability to bring regulators, exchanges, intermediaries, and industry bodies together on a common platform. This alignment anchored in transparency, innovation, and global competitiveness continues to strengthen the foundation on which GIFT City IFSC is growing as a trusted jurisdiction for international financial services.

In this context, industry associations such as the GBA play a meaningful role by facilitating dialogue, encouraging knowledge-sharing, and providing structured feedback that supports the development of a vibrant capital markets segment within GIFT City IFSC. Their efforts complement the broader initiatives undertaken by GIFT City and its stakeholders to create a future-ready financial ecosystem.

The publication of this magazine is a welcome step, as it provides an avenue to reflect on the evolving market landscape, highlight emerging opportunities, and bring together insights that contribute to shaping the future of international finance in India. Such platforms help deepen stakeholder engagement and further enhance the thought leadership emerging from GIFT City.

On behalf of GIFT City, I extend my warm wishes to the GIFT Brokers Association and its members for this initiative. The continued collaboration of market participants is essential in strengthening the IFSC ecosystem and advancing our shared vision of positioning GIFT City as India's Gateway to Global Finance.

As we move ahead, I remain confident that the collective efforts of all stakeholders will continue to drive innovation, reinforce investor confidence, and support the growth of a world-class financial centre that is future-oriented, resilient, and aligned with global standards.

**Sanjay Kaul** - Managing Director & Group CEO | Gujarat International Finance Tec-City (GIFT City)



# Gift Brokers Association Governing Members



**Nitesh Jaiswal**  
Chairman and President



**Chintan Shah**  
Vice President



**Apoorva Jain**  
Secretary



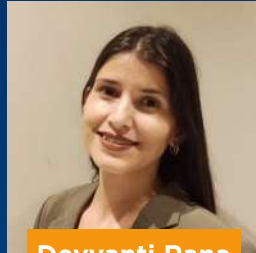
**Sunil Teli**  
Treasurer

# Regulatory Consultation and Events Committee

The Regulatory Consultation and Events Committee shall act as the key interface between the Association and regulatory bodies, ensuring timely and effective stakeholder engagement on evolving policy matters. The Committee's responsibilities shall include: Engagement with the Regulatory body on Consultation Papers, Regulatory Liaison, Knowledge Events and Awareness, and Capacity Building, etc.



**Chintan Shah**



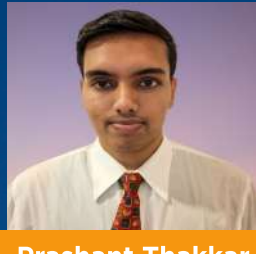
**Devyanti Rana**



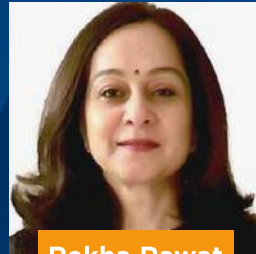
**Himanjal Brahmbhatt**



**Nitin Pahilwani**



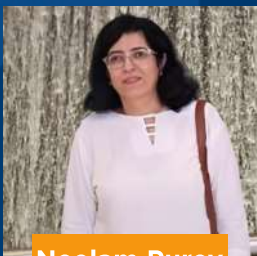
**Prashant Thakkar**



**Rekha Rawat**

# Technology Advisory Committee

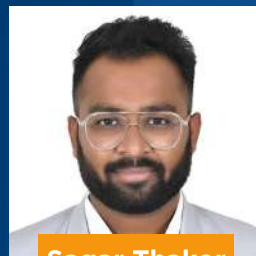
The Technology Advisory Committee (TAC) plays a critical role in guiding regulatory bodies, especially in sectors like capital markets, financial services, and technology infrastructure, in navigating the rapid evolution of technology. Their role includes Strategic Guidance on Technology Adoption, Evaluation of Technological Risks, Oversight on Technology Infrastructure, and Guidance on Regulatory Technology, etc.



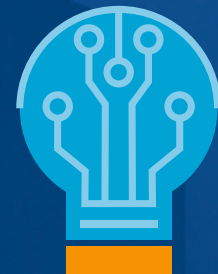
**Neelam Purey**



**Neha Jain**



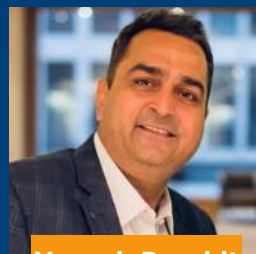
**Sagar Thakor**



**Satyendra Tiwary**



**Sunil Teli**



**Yogesh Purohit**



# Regulatory & Compliance Affairs Committee

Tasked with overseeing an organization's adherence to applicable laws, regulations, industry standards, and internal policies.

Brief to all members regarding any amendments in rules, circulars, and regulatory changes by IFSCA, Exchanges. It monitors emerging regulatory and compliance risks, reviews and updates internal controls and policies, assesses risk exposures, oversees compliance training, and escalates significant gaps or breaches to the Members.



Ankit Pansari



Apoorva Jain



Gaurang Raval



Gaurav Khinvsara



Mahalingam G.



Mukta Sharma



Umang Pandya

## Product Development

The Product Development Committee shall be responsible for identifying, evaluating, and recommending new products, services, or initiatives that align with the objectives of the Gift Brokers Association (GBA) and support the evolving needs of its members. This committee would play a crucial role in enhancing the financial offerings and market competitiveness within the GIFT IFSC ecosystem. It would primarily focus on identifying, developing, and promoting new financial products and services that benefit GBA members and the broader market.



Nitesh Jaiswal



Dinesh Modi



Pinakin Dave



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Mr. Sanjay Kaul**  
MD & CEO GIFT CITY



## GIFT City: India's Gateway to Global Finance

GIFT City is India's first operational smart city and international financial centre. Located between Ahmedabad and Gandhinagar, it stands as a symbol of India's growing strength in the global financial landscape. Conceived as a futuristic business district, GIFT City combines finance, technology, innovation, and lifestyle in one integrated ecosystem. It is not just another infrastructure project—it represents India's ambition to create a world-class financial gateway comparable to global financial centres.

Built on 886 acres, GIFT City has been developed as a “walk-to-work” smart city where business, residence, education, and recreation coexist in harmony. It boasts state-of-the-art urban infrastructure—24x7 clean water supply, 99.99% reliable power, underground utility tunnels, automated waste collection, and India's first district cooling system that saves 30% energy. The entire city is managed through a central command and control centre, making it one of the most technologically advanced urban areas in the country. Its modern skyline includes office towers, residential complexes, schools, hospitals, hotels, and entertainment facilities, offering professionals a high quality of life in a sustainable environment.

At the heart of GIFT City lies India's first International Financial Services Centre (IFSC), a global financial hub that connects India to international markets. The IFSC enables both inbound and outbound financial activities—allowing global investors to channel funds into India, and Indian entities to access global capital seamlessly. Today, GIFT IFSC is home to over 31 banks, two international stock exchanges, 200+ alternative investment funds (AIFs), 45+ insurance and reinsurance companies, 30+ aircraft and ship leasing firms, and a growing number of fintech firms and Global Capability Centres (GCCs). This diverse mix of institutions has created a vibrant and self-sustaining financial ecosystem.

One of GIFT City's biggest strengths is its favourable regulatory and tax environment. Entities setting up in GIFT IFSC enjoy 100% income tax exemption for 10 consecutive years within a 15-year block, no GST or customs duties on certain transactions, and no stamp duty or securities transaction tax on trades carried out in the IFSC. Non-residents are also exempt from capital gains tax on specified securities listed on GIFT exchanges. The Minimum Alternate Tax (MAT) is just 9% for eligible companies, and interest paid to non-residents on loans to IFSC units is tax-free. Moreover, businesses operating here are exempt from several Indian exchange control regulations, allowing them to deal freely in foreign currency. These advantages make GIFT City one of the most cost-efficient and business-friendly destinations for global investors.

Beyond the regulatory benefits, GIFT City offers unmatched ease of doing business. The unified regulator, the International Financial Services Centres Authority (IFSCA), streamlines oversight across all financial sectors—banking, insurance, capital markets, and funds—under a single framework. Combined with digital-first processes and single-window clearances, it significantly reduces compliance complexity and turnaround time.



Strategically located on the Delhi-Mumbai Industrial Corridor, GIFT City enjoys excellent connectivity. It is just 20 minutes from Ahmedabad International Airport, 15 minutes from the proposed Mumbai-Ahmedabad bullet train terminal and linked to Ahmedabad and Gandhinagar by a metro line under development. Its proximity to major manufacturing and industrial hubs of Gujarat makes it a natural choice for financial and technology companies catering to both domestic and global markets.

Talent availability is another key advantage. Gujarat hosts premier institutions such as IIM Ahmedabad and IIT Gandhinagar, producing a steady stream of skilled professionals. Within GIFT City itself, a new International Fintech Institute is being developed in collaboration with the Asian Development Bank and the Government of Gujarat, focusing on fintech research, innovation, and training. In addition, a dedicated International Branch Campus (IBC) building is under construction to host foreign universities, bringing global education and industry interaction to India's doorstep.

GIFT City is also a model of sustainable and inclusive urban development. It promotes the use of electric vehicles, green building practices, and renewable energy integration. The city's design encourages walkability and community living, with abundant green spaces, modern amenities, and a focus on wellness. Schools, hospitals, hotels, and leisure zones make it an ideal place to live, work, and play—truly embodying the spirit of a modern, self-contained city.

In essence, GIFT City represents India's bold leap into the future of global finance. It offers international investors a seamless entry into the Indian market, provides Indian companies access to global capital, and creates a hub for innovation in financial and technological services. With its robust infrastructure, progressive regulatory framework, and world-class living standards, GIFT City is not only reshaping India's financial geography but also setting new global benchmarks for integrated financial centres. It is, quite literally, the place where India meets the world.

# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Dr. Dipesh Shah**

Executive Director, Development, IFSCA



## GIFT City IFSC: Powering India's Global Financial Ambitions

The Government of India's establishment of the country's first International Financial Services Centre (IFSC) at Gujarat International Finance Tec-City (GIFT City), Gujarat, marks a landmark reform in India's financial sector. Conceived as a globally recognized hub, GIFT IFSC offers trusted regulations, a competitive tax regime, and a business-friendly environment that facilitates seamless international operations. Designated as a special financial jurisdiction and treated as a non-resident zone under India's Foreign Exchange Management regulations, it enables transactions in major foreign currencies such as USD, GBP, and Euro.

During his visit to GIFT City in July 2022, the Hon'ble Prime Minister highlighted that "the vision of India's future is associated with GIFT City," underscoring its role as a gateway connecting India with global opportunities. To realize this vision, the Government established the International Financial Services Centres Authority (IFSCA) in 2019 as a unified regulator, integrating powers from RBI, SEBI, IRDAI, and PFRDA. Over the past five years, GIFT IFSC has witnessed strong growth across banking, capital markets, insurance, funds management, leasing, fintech, and education sectors, with over 1,000+ registered entities as of September 2025—reflecting its rapid evolution into a preferred global financial destination.

### **Key Milestones and Growth**

#### **Regulatory Architecture:**

IFSCA has notified 35 Regulations and over 15 Frameworks, aligned with international best practices, to provide a robust and globally benchmarked regulatory environment for institutions operating within GIFT IFSC.

#### **Funds Industry:**

- 194 Fund Management Entities (FMEs) registered, including leading global managers such as Morgan Stanley, PAG, Capitaland, Franklin Templeton, Oaktree, and Mirae.
- 310 Alternative Investment Funds (AIFs) launched, with a targeted corpus of USD 75 billion as of September 2025.

#### **Capital Markets:**

- Complete ecosystem with Stock Exchanges, Clearing Corporations, Depository, and market intermediaries.
- Monthly turnover on IFSC exchanges reached USD 87 billion in September 2025.
- 170+ Bonds listed by around 50 issuers, with a cumulative value of USD 67 billion.
- NSE IX-SGX Connect, operational since July 2023, records average daily Nifty derivative turnover of USD 4 billion.

**Banking Sector:**

- 35 Banks (18 foreign and 17 Indian) have established IFSC Banking Units (IBUs), including DBS, Deutsche Bank, Citi, HSBC, JP Morgan, MUFG, and Standard Chartered.
- Total banking assets expanded from USD 14 billion (2020) to USD 100 billion (2025).

**Bullion Market:**

- India International Bullion Exchange (IIBX) launched by the Hon'ble PM in July 2022.
- Till July 2025, 101 tonnes of gold and 1,148 tonnes of silver traded and imported through IIBX — all backed by underlying physical bullion.

**Insurance & Reinsurance:**

- 52 entities registered, including 22 IFSC Insurance Offices and 30 intermediaries.
- Leading global insurers include Berkley Insurance Co., Doha Insurance Group, Peak Reinsurance, HDFC International Life, and Singapore Re.

**Aircraft Leasing:**

- 33 leasing companies operational, managing 303 aviation assets (134 aircrafts and helicopters, 84 engines, and 85 auxiliary power units).
- Domestic carriers such as IndiGo and Air India have commenced leasing operations from GIFT IFSC.

**Ship Leasing:**

- 26 ship leasing entities active, including international players such as CMA CGM, MOL Shipping, and Transworld Shipping.

**Education & Skill Development:**

- Deakin University and University of Wollongong (Australia) commenced operations in 2024.
- Queen's University Belfast, Coventry University, and University of Surrey (UK) received in-principle approval for International Branch Campuses.

**TechFin and Ancillary Services:**

- Introduction of the IFSCA (TechFin and Ancillary Services) Regulations, 2025, enabling a single unified license covering 50+ professional and technology-related services.
- Aims to create a unified regulatory framework for professional and digital service providers.

**New Regulatory Initiatives and Digital Innovations**

A key innovation enhancing GIFT IFSC's global integration is the Global Access Provider (GAP) Framework introduced by IFSCA. It allows regulated entities to offer investors seamless and compliant access to global financial markets under Indian regulatory oversight. By ensuring transparency, investor protection, and adherence to KYC and AML norms, the framework simplifies overseas investments and strengthens GIFT City's position as India's gateway to global finance.

Furthering its digital transformation, IFSCA's October 31, 2025 circular amended the AML/CFT/KYC Guidelines, 2022 to enhance the Video-based Customer Identification Process (V-CIP or V-KYC). The revised framework enables secure, paperless, and remote onboarding by regulated entities, financial group companies, and KRAs under strict cybersecurity and data protection norms. This reform boosts efficiency, lowers compliance costs, and facilitates easier access for both domestic and NRI investors, reinforcing GIFT IFSC's image as a digitally advanced and globally competitive financial hub.

**The Road Ahead:**

With a unified regulator, globally benchmarked regulatory framework, and forward-looking reforms, GIFT IFSC has become a cornerstone of India's global financial integration strategy. The convergence of initiatives such as the GAP Framework, TechFin Regulations, and enhanced V-KYC demonstrates India's commitment to building a future-ready financial ecosystem that marries innovation with global best practices.

GIFT IFSC today stands as a symbol of India's financial modernization — connecting India's growth story with global capital, technology, and talent. As it continues to attract global financial institutions, investors, and universities, GIFT IFSC is well-positioned to emerge among the world's leading international financial centres — serving as India's window to the world and the world's gateway to India.



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Mr. Pradeep Ramakrishnan**  
Executive Director, Capital Market, IFSCA



## Remote Trading Participants (RTPs) on Stock Exchanges in the IFSC

### Who is a RTP?

A foreign entity, not having a physical presence in IFSC, that can trade directly on the Stock Exchanges, on a proprietary basis, without a Broker-Dealer are referred to as a Remote Trading Participant (RTP). The advantage of a remote trading participant is that it can seamlessly place and execute orders on the stock exchange platform from its remote location. Internationally, many regulators and stock exchanges allow this type of participant. For example, Singapore permits Remote Trading Members without have no office in Japan and can execute proprietary transactions and overseas customer transactions.

### Why RTP?

IFSCA was in receipt of representations from market participants including Stock Exchanges, requesting direct participation by foreign institutions on the Stock Exchanges. It was suggested that this enabler is likely to increase the number of participants and make the secondary market more vibrant and liquid. Accordingly, it has been decided to permit foreign entities, not having a physical presence in IFSC, to trade directly on the Stock Exchanges, on a proprietary basis, without a Broker-Dealer. Such an entity shall be referred to as a Remote Trading Participant (RTP).

### Conditions for onboarding a RTP:

• **IFSCA states that an entity shall be onboarded as RTP by the Stock Exchange only after the following conditions are satisfied :**

**1.** An entity regulated by the securities market regulator in its home jurisdiction (country where it has been incorporated), shall be eligible to be onboarded as a RTP, subject to the following conditions:

**A.** The entity is a resident of a country whose securities market regulator is a signatory to the International Organization of Securities Commission's Multilateral Memorandum of Understanding (IOSCO-MMoU) or a signatory to the bilateral Memorandum of Understanding (MoU) with IFSCA.

**B.** The entity is a body corporate.

**C.** The entity is not a resident of a country identified in the public statement of the Financial Action Task Force (FATF) as –

a jurisdiction having strategic Anti-Money Laundering or Combating the Financing of Terrorism deficiencies to which counter measures apply;

**or**

a jurisdiction that has not made sufficient progress in addressing the deficiencies or has not committed to an action plan developed with the Financial Action Task Force to address deficiencies.

**D.** The entity shall be permitted to trade only on a proprietary basis and shall not be permitted to onboard clients.

**E.** The entity shall be permitted to transact only in cash-settled derivative products on the Stock Exchanges.

**F.** The entity shall be required to enter into an agreement with an IFSCA registered Clearing Member for clearing and settlement of its transactions executed on the Stock Exchanges.

**2.** An entity not regulated by the securities market regulator in its home jurisdiction (country where it has been incorporated) shall be eligible to be onboarded as a RTP subject to the following:

**A.** The entity is a member of any of the following Stock Exchanges, or such other Stock Exchanges as may be specified by IFSCA from time to time:

1	United States of America (USA)	<ul style="list-style-type: none"> <li>• New York Stock Exchange (NYSE),</li> <li>• National Association of Securities Dealers Automated Quotations (NASDAQ)</li> <li>• Chicago Mercantile Exchange (CME)</li> <li>• Intercontinental Exchange (ICE)</li> </ul>
2	Japan	Tokyo Stock Exchange
3	South Korea	Korea Exchange
4	United Kingdom excluding British Overseas Territories	London Stock Exchange (LSE)
5	France	Euronext, Paris
6	Germany	<ul style="list-style-type: none"> <li>• Frankfurt Stock Exchange</li> <li>• Eurex Exchange</li> </ul>
7	Canada	Toronto Stock Exchange
8	Singapore	Singapore Exchange (SGX)
9	Taiwan	Taiwan Stock Exchange
10	Israel	Tel Aviv Stock Exchange (TASE)
11	Australia	Australian Securities Exchange (ASX)
12	United Arab Emirates(UAE)	<ul style="list-style-type: none"> <li>• Abu Dhabi Securities Exchange (ADX)</li> <li>• Dubai Gold &amp; Commodities Exchange (DGCX)</li> <li>• Dubai Financial Market</li> <li>• NASDAQ, Dubai</li> </ul>
13	Netherlands	Euronext Amsterdam
14	Switzerland	SIX Swiss Exchange
15	South Africa	Johannesburg Stock Exchange
16	Indonesia	Indonesia Stock Exchange
17	Thailand	Stock Exchange of Thailand
18	Malaysia	Bursa Malaysia
19	Philippines	Philippine Stock Exchange
20	Saudi Arabia	Saudi Stock Exchange (Tadawul)
21	Ireland	Irish Stock Exchange
22	Sweden	Nasdaq Stockholm
23	Brazil	A Bolsa do Brasil   B3
24	Denmark	Nasdaq Copenhagen
25	Mexico	Mexican Stock Exchange
26	Vietnam	Hanoi Stock Exchange
27	Belgium	Brussels Stock Exchange
28	Nigeria	Nigerian Stock Exchange

**B.** The entity shall be compliant with the conditions as mentioned at para 1(i)(a) to 1(i)(f) above.

### **Is it available for entities from India?**

No. IFSCA has clarified that an entity incorporated in India will not qualify to be onboarded by the Stock Exchanges as a RTP. It is available on the Stock Exchanges in the IFSC – NSE IX and India INX Stock Exchanges that come under the purview of IFSCA.

### **Onboarding of a RTP – AML requirements:**

The RTP shall be onboarded by the Stock Exchange in accordance with the IFSCA (Anti Money Laundering, Counter Terrorist-Financing and Know Your Customer) Guidelines, 2022. This is to protect against money laundering and to counter terrorist financing.

### **Responsibilities of Stock Exchanges for RTP onboarding and operations:**

- The recognized Stock Exchanges in IFSC shall be responsible for specifying the terms and conditions for onboarding a RTP, inter alia including the risk management measures and code of conduct in relation to the RTP.
- The recognized Stock Exchanges shall have the operational flexibility to specify the net-worth criteria, security deposit, application fee, annual fee and any other additional conditions for onboarding a RTP. The Stock Exchanges shall ensure that the RTP is in compliance with the conditions as mentioned in the circular.
- The recognized Stock Exchanges shall take necessary steps to implement this Circular including amending their bye-laws, rules and regulations (if required).

### **Conclusion:**

The advantage of a RTP is that the participant can place trades in a different location without going through the process of incorporating an office in the location. This enabler of IFSCA is expected to:

- **Increase the number of participants and make the secondary market more vibrant and liquid.**
- **Eliminate the overhead and operational costs involved in setting up a new entity or a branch office in IFSC.**
- **Boost the number of participants in the secondary market.**
- **Improve the ease of doing business and attract more foreign investments**

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<https://www.nseix.com/membership/RTP>

<https://www.jpx.co.jp/english/rules-participants/participants/outline/index.html>

<https://ifsc.gov.in/Legal/Index?MId=sO4dQaG5dCs=>

<https://www.indiainx.com/circulars/20240611-4/20240611-4.pdf>



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS



BY  
**Mr. Praveen Kamat**  
General Manager, Division  
of Market Infrastructure  
Institutions, Capital Markets  
Department, IFSCA

**Mr. Abhinav Kadyalwar**  
Assistant Manager, IFSCA



## The Quantum Kryptonite: How Quantum Computing will change Cybersecurity as we know it

### The year is 2035.

It begins with a silent breach at a mid-tier public sector bank in Mumbai. No headlines. No alarms. Just a quiet blip buried in the server logs. But before the bank can even realise it's been attacked, more reports begin pouring in. "BREAKING NEWS: HACKS ACROSS THE FINANCIAL SECTOR": a string of insurance companies, a few celebrated stockbroking firms, a pair of fintech companies that millions of Indians rely on for everyday transactions, all brought down to their knees. Major Indian banks are abruptly locked out of the SWIFT network. ATMs across the country begin spewing cash at random. Humongous sell orders begin firing across the stock exchange as if the entire market had a fat finger moment. The hacks occur by the second, until it's no longer a question of if, but when.

A name begins to surface in intelligence briefings, dark web forums, and hushed internal memos: shìjiè mòrì, Mandarin for "End of the World." But the world would come to know it by a simpler name: the Doomsday Machine. Security experts describe it as "fighting an enemy who has every master key ever made." A fully functional quantum computer — a technology once thought to be at least a decade away — slice through India's financial infrastructure like a scalpel through silk.

What you just read is a glimpse of “Q-Day”, the hypothetical moment when quantum computers become powerful enough to render today’s encryption obsolete, tearing through the digital fabric of our world. This may sound like a dystopian science fiction, but every element of it is grounded in real chinks that exist in our extant cybersecurity armour. The truth is, the encryption algorithms that secure everything from our WhatsApp chats to our bank accounts weren’t built for the age of quantum computers. And while the “Doomsday Machine” doesn’t exist (yet), quantum computing does. It is advancing rapidly.

But what makes quantum computers so dangerous to our digital world? To understand that we need to unpack what makes them different and why the math that protects us today might not protect us tomorrow.

## Quantum 101

In a classical computer, a bit represents either a 0 or a 1. This essentially forces classical computers to go through one possible solution at a time. In contrast, the quantum computers use qubits, or quantum bits, which can represent both 0 and 1 at the same time, due to a peculiar property called superposition. As the number of qubits grows, the number of possible solutions a computer can simultaneously imagine grows exponentially. A computer with two qubits represents four possibilities at once, three qubits represent eight, and so on. This means a quantum computer can look at many possible solutions at the same time, instead of doing it one-by-one like a classical computer.

In addition, we have what is called ‘entanglement’. When two qubits become ‘entangled’, the state of one qubit is linked to the other, even if they are far apart. Modifying one qubit instantly modifies the other as well. This almost mystical property allows quantum computers to solve problems much more quickly than a classical computer, where bits work separately.

Classical computers use basic operations like AND, OR, and NOT gates. However, quantum gates make use of superposition and entanglement to speed up their performance. By using superposition, entanglement, and quantum gates, quantum computers can explore huge numbers of possibilities at once.

## The One-Way Street to Security

Cryptography has been humanity’s magic ‘locker’ for thousands of years, protecting information from prying eyes. As children, many of us have used the ‘Caesar cipher’, a simple cryptographic method invented by the Roman Emperor Julius Caesar, which works by shifting letters through the alphabet to hide messages from outsiders. For most of history, keeping secrets meant both sides needed to share the same key. For example, two brokers transmitting the message “HCB” to mean “GBA” would need to know the trick: replace each letter with the next one in the alphabet. This shared secret, the “key”, is both their strength and their vulnerability. If an eavesdropper overheard or stole the key, the entire communication will be compromised.

However, in 1976, two American mathematicians and cryptologists, Whitfield Diffie and Martin Hellman, invented a method that allowed people to scramble a message systematically, which we call “encrypting”, and send it safely over a communication line like the internet or a radio signal that anyone could potentially tap into. Shortly after, at MIT, Ronald Rivest, Adi Shamir, and Leonard Adleman solved one of the problems that would change cybersecurity forever. They invented asymmetric cryptography, a system where one key is used to encrypt the message, and a different key is used to decrypt, or unscramble, it. This ushered in a new era of secure communication at scale.

The brilliance of asymmetric cryptography lies in one-way mathematical problems, or what are called “hard problems”, which are easy to solve in one direction, but extremely hard to work backward. It is a lock that is easy to fasten but brutally difficult to pick. While multiplying two large prime numbers is trivial for computers, working backward to find the original primes from their product becomes practically impossible as numbers grow larger. This is the famous integer factorization problem that forms the foundation of RSA encryption, named after its MIT creators, discussed earlier. RSA protects our online worlds, securing HTTPS web connections, authenticating digital signatures, and enabling secure VPN access to office networks. Other asymmetric systems like Diffie-Hellman tackle equally challenging mathematical problems (discrete logarithm problems in this case) to safeguard Wi-Fi networks, messaging apps, and DLT transactions. This elegant mathematics has quietly become the invisible plumbing underpinning our digital world, with over 90% of encrypted data today relying on these asymmetric cryptography systems.

## The Fault In Our Ciphers

In 1994, Peter Shor, an American Computer Scientist and Mathematician, developed an algorithm designed to efficiently factorize large numbers, providing an exponential speedup over the best-known classical algorithms for factoring. Shor's algorithm, running on a powerful enough quantum computer, what experts call a "Cryptographically Relevant Quantum Computer" (CRQC), could break RSA, Diffie-Hellman, ECC, and virtually every other traditional asymmetric encryption system. Two years later, Luv Kumar Grover, an Indian American mathematician who completed his B. Tech from IIT Delhi, developed another such quantum algorithm, effectively halving the strength of symmetric cryptographic algorithms.

These two developments ushered in a new era, exposing the chinks in our digital armours. If we have anything like the 'doomsday machine' as discussed in the opening of the article, we will need to replace all the asymmetric algorithms with new algorithms that are resistant to quantum attacks. For symmetric algorithms, we will need to at least double the key length to achieve the same strength as they have today. However, another problem that arises is that these two do not always work independent of each other; they are as intricately linked. Symmetric keys are often transmitted by using asymmetric cryptography. If quantum computers break the asymmetric methods, then the whole encryption process, even one rooted in symmetric encryption, becomes jeopardized.

## Harvest Now, Decrypt Later

Adding to the urgency, a silent, looming threat has already begun to materialize. Hackers are actively engaging in a tactic known as "Harvest Now, Decrypt Later." They are intercepting and collecting vast troves of encrypted communications and sensitive data today, storing them indefinitely with the expectation that quantum computing capabilities will eventually mature enough to decrypt them. What is secure now may become utterly transparent in the future once quantum decryption becomes feasible. This approach is particularly dangerous because data such as personal information, medical records, state secrets, intellectual property, and military communications often have a long shelf-life.

## Deus Ex Machina

The solution to this quantum kryptonite, or shall we say, quantum 'cryptonite', lies in cryptography itself. Current encryption standards were developed for a world where quantum computers were science fiction. But just as there are problems that classical computers are very bad at solving, there should also be problems that even quantum computers struggle with.

Enter Post-Quantum Cryptography (PQC). It refers to cryptographic algorithms believed to be resistant to the potential threats posed by quantum computers. For example, lattice-based cryptography relies on the difficulty of solving certain lattice problems, problems related to the arrangement of points in multi-dimensional space. It is thought to be resistant to attacks by quantum computers.

The U.S. National Institute of Standards and Technology (NIST) launched a global competition in 2016 to identify quantum-resistant cryptographic algorithms. In August 2024, after eight years of intensive review and analysis, NIST released the final, approved specifications for three Post-Quantum Cryptography (PQC) algorithms. These algorithms, as NIST claims, are quantum-resistant as well as ready to be implemented at scale.

The scenario of India's financial collapse in 2035 may be fictional, but the risks are real. Governments, corporations, and individuals must act now to future-proof their systems. Transitioning to post-quantum cryptography won't be easy or quick. It will require global coordination, massive infrastructure upgrades, and a race against time before the first CRQC emerges. But the stakes are too high to ignore. Are we ready?

## About the Authors

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# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Mr. V. Balasubramaniam**  
Managing Director & CEO,  
NSE International Exchange (NSEIX)



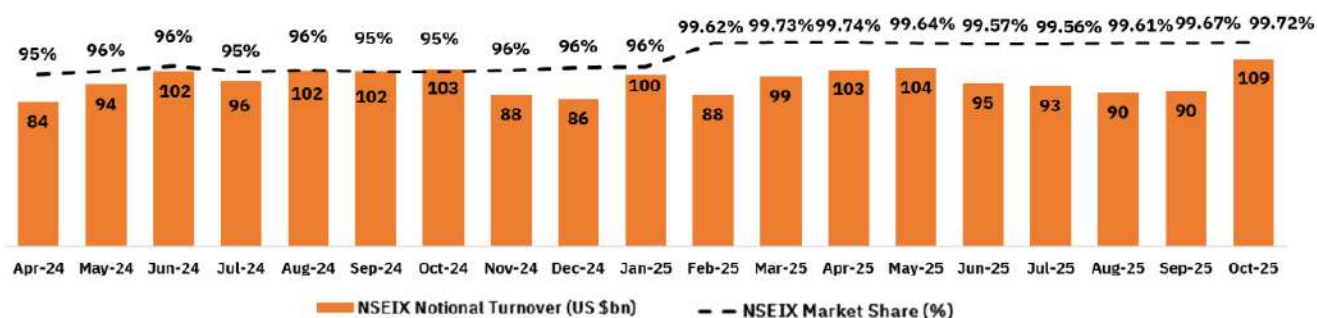
## NSE International Exchange - Bridging India with the World: Innovation, Integration, and Global Leadership

When our Hon'ble Prime Minister Shri. Narendra Modi envisioned creating India's first International Financial Services Centre that could compete with the best in the world, it was not merely building another financial district—it was laying the foundation for India's global financial future. Today, GIFT City stands as that symbol of India's ambition to become a global financial and technology hub, representing modernization, innovation, and integration with international markets. It symbolizes the country's progress by combining world-class infrastructure, a business-friendly environment, and a focus on smart, sustainable urban development.

At the heart of GIFT City's remarkable transformation stands NSE International Exchange (NSEIX) — a leading universal multi-asset exchange that is nurturing new opportunities and channelizing capital flows between India and global markets. Through strategic global partnerships, innovative product offerings, and state-of-the-art technology, NSEIX continues to strengthen India's financial linkages with the world.

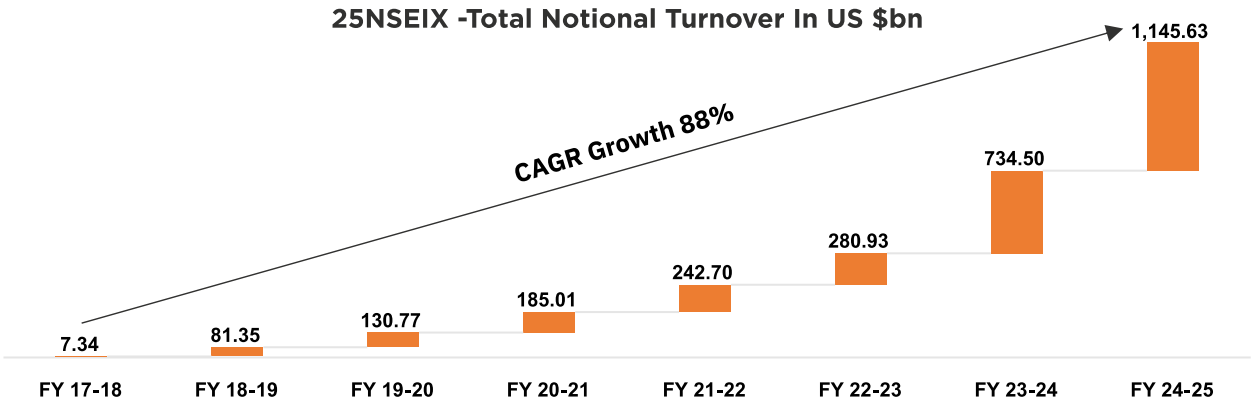
As the leading international exchange with a dominant market share exceeding 99.7% in GIFT IFSC, NSEIX has been instrumental in translating the vision of GIFT City into tangible outcomes — facilitating capital raising, attracting global investors, pioneering product innovation, and deepening market liquidity. Together, these efforts have positioned GIFT City as an emerging premier global financial hub.

### NSEIX Notional Turnover and Market Share (%) in GIFT IFSC Exchanges



Conceived with a vision to cater to both inbound and outbound investment and hedging needs, NSEIX today offers a diversified portfolio of products, including Indian single stock and index derivatives, currency derivatives, and global stocks. On the primary market front, the exchange provides a comprehensive listing framework covering Equity listing, SPACs, REITs, InvITs, Depository Receipts, Debt securities, and ESG-linked bonds — all under the progressive IFSCA (Listing) Regulations, 2024.

Over the past eight years, NSEIX’s total turnover has surged from US \$7 billion in FY 2018 to over US \$1.15 trillion in FY 2025, reflecting an impressive 88% compound annual growth — a testament to its leadership, innovation, and the growing global confidence in the GIFT City ecosystem.



**Innovation at the Core**

At NSEIX, innovation is not merely a pursuit—it defines our DNA. Every milestone we achieve stems from our commitment to reimagine what a global exchange can offer. From introducing extended trading hours that align seamlessly with international market timings, to pioneering unsponsored depository receipts on the Top 50 U.S. stocks—a first-of-its-kind initiative in India’s IFSC ecosystem—NSEIX continues to set new benchmarks in market innovation. We further expanded our product suite with the launch of India’s first fixed income derivatives contracts on the Bharat Bond Index and daily expiry options contracts on India’s premier benchmark index -Nifty 50', empowering investors with greater flexibility and efficiency.

The full-scale transition of SGX Nifty to Gift Nifty fortifies not only GIFT City’s stature as a fast-emerging global financial hub but also aligns impeccably with the visionary aspirations of Hon'ble Prime Minister, Shri Narendra Modi, to position India at a preeminent position in international finance. It is a major step forward for India to be a 'price setter' of the financial world, as envisioned by Hon'ble Prime Minister of India. NSEIX SGX Gift Connect the is First of its kind high-performance financial corridor between Singapore and India, driving deeper liquidity for the Nifty products.



The NSE IX – SGX Connect was formally launched by Hon'ble Prime Minister of India, **Shri Narendra Modi**

The introduction of India's first Zero-Day-to-Expiry (ODTE) Options on the Nifty 50 Index from GIFT City further underscores NSEIX's ability to design cutting-edge instruments that reshape trading behavior and liquidity dynamics.

NSEIX Global Access IFSC Ltd. (NSEIX GA), a wholly owned subsidiary of NSEIX, has been launched as India's first Global Access Provider under the IFSCA regulatory framework. Expected to become fully operational by Q3 FY25-26, NSEIX GA will serve as a seamless gateway for global investments, enabling Indian investors to invest in equities, bonds, and global ETFs under the Liberalized Remittance Scheme (LRS) of RBI, while entities in GIFT IFSC and non-resident investors will be able to trade global derivatives and other permitted financial securities. NSEIX GA will create strong business and operational synergies with NSEIX — while NSEIX continues to focus on inbound investment, NSEIX GA will broaden the group's capabilities by facilitating outbound access to global markets. Together, this integrated offering will position NSEIX as a comprehensive global investment hub within GIFT City, providing two-way access for both inbound and outbound investments.



#### **NSEIX unveils India's first Global Access Provider - NSEIX Global Access IFSC Ltd. (NSEIX GA) under IFSCA Regulatory framework**

Underpinning these innovations is a technology-first approach, delivering world-class trading infrastructure, matching engines, and risk management systems that rival the best global Non-Confidential exchanges. Designed for speed, scalability, and resilience, our systems reflect the core values of the NSE brand—reliability, transparency, and trust—and reinforce our vision to position NSEIX as the global gateway for channelizing investments into India and beyond.

#### **Building a Strong Foundation**

As India charts its course to become the world's third-largest economy, the GIFT Nifty has emerged as a gateway for global investors seeking efficient exposure to India's growth story. The re-domiciliation of SGX Nifty to GIFT Nifty in July 2023 marked a watershed moment in India's financial evolution—symbolizing trust, collaboration, and the maturing depth of our international financial ecosystem. The consistent growth of GIFT Nifty volumes and multiple turnover milestones stand as a testament to the strength of the IFSCA's progressive regulatory framework and the collective efforts of all stakeholders.



#### **"A New Benchmark to the Growth Story of Indian Equity Market"**

Total cumulative volume

US \$2.4 Tn  
~52.77Mn contracts

Highest Single Day Turnover

US \$22.88 Bn  
5,32,783 contracts

All time high Open Interest

US \$21.23Bn  
4,10,100 contracts

Average Daily Turnover

US \$4.5 Bn+

Data since full scale operation from July 3, 2023 till October 31, 2025



At NSEIX, we view capital formation as the cornerstone of sustainable economic progress. As the leading universal exchange within GIFT IFSC, NSEIX plays a multifaceted role in enabling fund raising across debt and equity markets — fostering economic growth, channelizing global capital into India, and strengthening GIFT City's position. The listing of debt securities on NSEIX has gained remarkable traction, underscoring the confidence issuers place in GIFT City. As of date, more than US \$70.3 billion worth of Medium-Term Note (MTN) programmes have been established, and cumulative debt listings have exceeded US \$34.76 billion since commencement. Within this, ESG and green-themed bonds account for more than US \$8 billion, underscoring GIFT City's growing prominence as a hub for sustainable finance and its contribution to advancing India's net-zero commitments. The equity segment too is witnessing transformational progress. A landmark development has been the recent filing of the first Draft Red Herring Prospectus (DRHP) of XED Executive Development Limited with NSEIX as the designated stock exchange — paving the way for the first-ever equity IPO from GIFT City.



**DFCC Bank PLC, Sri Lanka becomes the First Foreign Corporate Green Bond issuance to list on NSEIX**

**SBI Lists USD 500 Mn bonds under its USD 10Bn GMTN on NSEIX**



At NSEIX, we continue to strengthen global and domestic partnerships that enhance GIFT City's role as a gateway for cross-border investments. Recently, NSEIX signed strategic MoUs with the Institute of Chartered Accountants of India (ICAI) and Sa-Dhan, the RBI-recognized self-regulatory organization for microfinance institutions. Through our collaboration with ICAI's overseas chapters, we aim to channel NRI and global investor participation into India via GIFT City, while our engagement with Sa-Dhan seeks to enable Indian microfinance institutions to access international capital efficiently.

**XED Executive Development Limited filed its DRHP with NSEIX as the designated Stock Exchange, marking a historic milestone as the first equity IPO at GIFT IFSC**



**XED Executive Development Limited filed its DRHP with NSEIX as the designated Stock Exchange, marking a historic milestone as the first equity IPO at GIFT IFSC**



**NSEIX signed a landmark MoU with Sa-Dhan**

With a strategic vision to seamlessly channel global capital into India, NSEIX serves as a key enabler in strengthening cross-border investment linkages. By expanding global connectivity -subject to regulatory and government approvals - NSEIX is paving the way for greater collaboration with international exchanges. This initiative represents a major stride toward enhancing India's financial market integration with the global ecosystem and broadening investor access to India's growth opportunities. Apart from our long-standing partnership with the Singapore Exchange, NSEIX has also signed a strategic MoU with the Cyprus Stock Exchange to facilitate cross & dual listings and promote bilateral capital market collaboration during the visit of Hon'ble Prime Minister Shri Narendra Modi to Cyprus.



**NSEIX signs an MoU with Cyprus Stock Exchange in the presence of Hon'ble Prime Minister of India, Shri Narendra Modi ji, and H.E. Mr. Nikos Christodoulides at Limassol, Cyprus.**



Complementing this, NSEIX's secondary market ecosystem continues to deepen liquidity and broaden participation through innovation and access. Enabled by IFSCA's forward-looking regulations, our remote trading participation framework allows High frequency traders, hedge funds, and delta desks to seamlessly trade India-linked products from anywhere in the world on NSEIX. This flexibility strengthens global connectivity, encourages diverse market participation, and enhances market depth.

In essence, NSEIX's mission extends far beyond operating an exchange — it is about shaping India's international capital market of the future. Through its comprehensive efforts in facilitating efficient fund-raising, fostering sustainable finance, deepening cross-border connectivity, enabling innovation-driven participation, and building strategic global partnerships, NSEIX is powering GIFT City's evolution into a vibrant global trading and capital-raising hub — firmly aligned with India's vision of becoming a leading force in global finance.

### **Future Vision: From Global Connectivity to Global Leadership**

The journey of GIFT City has just begun, and NSEIX is the true torchbearer of GIFT City — the preferred venue for global investors seeking seamless access to India.

Aligned with India's ambition of becoming a 'Viksit Bharat' by 2047, NSEIX is driving innovation, deepening liquidity, and expanding access across asset classes. Supported by IFSCA's progressive framework and world-class infrastructure, it is catalysing the next wave of India's financial globalization.

From being a global connector to a global leader, NSEIX is pioneering cutting-edge products, leveraging advanced technology, and fostering innovation to make GIFT City not just India's international financial hub, but one of the world's most dynamic, trusted, and future-ready financial centres.



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Mr. Vijay Krishnamurthy**

Managing Director, India International Exchange



## Empowering Brokers in India's Global Marketplace

Best Wishes to the GIFT Broker Association on its Semi Annual Publication

It gives me great pleasure to extend my best wishes to the GIFT Broker Association on the release of its Annual Publication. This initiative is a reflection of the Association's commitment to knowledge sharing, collaboration, and strengthening the financial ecosystem at GIFT City.

Brokers and intermediaries operating from GIFT IFSC continue to play a pivotal role in making India a preferred international financial centre. Their efforts in promoting transparency, professionalism, and innovation have been central to the success of our market ecosystem.

At India INX, we remain committed to advancing this shared vision by offering world-class infrastructure, innovative products, and seamless access to global investors. In particular:

- India INX provides easy access for global clients to participate in the Indian capital markets, enabling international investors to engage with India's growth story efficiently and transparently.
- Both Indian and global companies can raise capital from global investors through India INX, facilitating cross-border fundraising and enhancing India's presence in international financial markets.
- Our exchange continues to build a globally competitive platform that integrates innovation, speed, and efficiency to serve the evolving needs of issuers, intermediaries, and investors alike.

At India INX we are also enabling seamless access of global market, introduce innovative products, and create an ecosystem that empowers every participant — from institutions to intermediaries.

The GIFT Broker Association, through initiatives such as this publication, continues to contribute immensely to industry dialogue, professional development, and the strengthening of GIFT City's position as a global financial gateway.

On behalf of India INX, I extend my best wishes to the Association, its leadership, and all its members. May this publication inspire new ideas, partnerships, and continued success for all stakeholders in the GIFT ecosystem.



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS



BY  
**Mr. Ashok Gautam**  
MD & CEO, IIBX

**Mr. Ranjit Singh**  
Head, Business & Product  
Development, IIBX



## Transforming India's Bullion Market Through IIBX

### About IIBX

India is consistently one of the largest consumers of gold globally (often second only to China), driven primarily by cultural and religious demand for jewellery during weddings and festivals. This vast consumption is met largely through imports, making India a critical driver of global gold flows.

Giving a major boost to India's aspiration of having its own International Bullion Exchange and paving the way for India to play a larger role in the global bullion market, India International Bullion Exchange IFSC Limited (IBX) was launched by the Honourable Prime Minister of India, Shri Narendra Modi on 29th July, 2022.

IIBX is promoted by India's leading market infrastructure institutions like NSE, INDIA INX & INDIA ICC (subsidiary of BSE), NSDL, CDSL and MCX. IIBX is established at GIFT IFSC, Gandhinagar, Gujarat, India. IIBX is regulated by International Financial Services Centres Authority (IFSCA).

IIBX has been conceptualised to provide a gateway to import bullion into India and provide world class bullion exchange ecosystem to promote bullion trading, investment in bullion financial products and vaulting facilities in IFSCs.

### Participation

RBI on 09th February 2024, has issued circular no. RBI/2023-24/120 allowing participation of Indian Banks on IIBX as Indian banks authorized to import gold/silver to act as a Special Category Client (SCC) of IIBX. IIBX is in receipt to few inquiries from nominated banks to get onboard as SCC. HDFC, ICICI & SBI is already onboarded as SCC as a Nominated banks with IIBX.Taccount (similar to shares), which is opened with the India International Depository IFSC Limited (IIDI).

IFSCA-PMTS/10/2023-Precious Metals dated October 10, 2025, for QJs entity shall be engaged in the business of goods falling under ITS(HS) codes 7106, 7108, 7113, 7114 and 7118 under Chapter 71 of ITC(HS).

- 60% of annual turnover in each of the last 3 financial years including the current financial year until the date of making the application, or
- 90% of annual turnover in the previous entire financial year including the current financial year until the date of making the application.
- The entity shall have a minimum net worth of INR 15 crore as per its latest audited financial statement.

## How IIBX Works: A Process Overview

The India International Bullion Exchange (IIBX) is a landmark initiative aimed at transforming India's bullion market by providing a seamless and transparent platform for trading gold and silver.

For the first time ever, Indian resident Qualified Jewellers (QJs) can now directly import bullion into the country by using a Trading Members of IIBX. The IIBX has already successfully onboarded India's top bullion dealers and jewellers, with many more applications currently being processed.

IIBX acts as a unified, transparent market. Global bullion banks, refiners, and traders can directly access the platform to reach a large pool of buyers. Conversely, QJs gain access to multiple international suppliers and can submit bids against offers in a transparent environment. The IFSC location also provides an additional convenience for suppliers, allowing them to easily re-export bullion as needed.

Bullion on IIBX is traded in the form of Bullion Depository Receipts (BDRs). BDRs are held in a Demat account (similar to shares), which is opened with the India International Depository IFSC Limited (IIDL).

### Preparation & Creation of BDRs (The Supply Side)

- The Qualified Supplier (QS) (e.g., global bank, refiner, or trader) transports physical gold or silver to an IFSCA-approved vault located within the GIFT IFSC.
- The Vault Manager verifies the purity and quantity of the bullion.
- The IIDL, upon verification, issues Bullion BDRs in a dematerialized (demat) form. These BDRs are credited to the Qualified Supplier's demat account.
- The Seller's Trading Member/Clearing Member ensures an early pay-in of the BDRs to the Exchange to cover the sell obligation before the order is placed.

### Trading on Exchange

- The Qualified Jeweller (QJ), who is the primary buyer, opens a trading and demat account with an IIBX Trading Member and IIDL. They also have to arrange for 100% early pay-in of funds (in US Dollars) to cover their buy obligation.
- Orders are matched based on price and time priority on a unified, transparent platform.

### Clearing & Settlement

- The IIBX offers a T+0 settlement cycle for BDRs. In fact, it is a global first to introduce settlement every 30 minutes throughout the trading day.
- IIBX offers 4 times funds settlement cycle at every 12:15, 15:15, 18:45 & 21:30 (IST).

### Extinguishment & Physical Delivery

- The Buyer (QJ), now holding the BDRs, submits a withdrawal request to the Depository (IIDL).
- The IIDL initiates the Bullion Withdrawal Request. The BDRs are extinguished and the buyer's demat balance is reduced.
- The QJ receives an Extinguishment Summary Report from IIDL, which they use to file a Bill of Entry with the customs department and pay the necessary customs duty for importing the gold into the Domestic Tariff Area (DTA).

### Products on Offer

Currently, IIBX is offering LBMA Gold 995, LBMA Gold Mini 999, UAEGD GOLD 995, UAEGD GOLD 999, UAEGDTRQ GOLD 995, UAEGDTRQ GOLD 999 in the gold spot segment while in the silver spot segment there are LBMA SILVER Grains, UAEGD SILVER Grains, UAEGDCEPA SILVER Grains, LBMA Silver Bar, UAEGD SILVER BAR. New products are in pipeline and will be on offer once they are ready to be launched.

### Objectives

IIBX aims to be Asia's top bullion hub, offering a unified ecosystem and a modern digital platform for global trade and risk management.

# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Ms. Krishna Gangopadhyay**  
MD and CEO, IIDI



## IIDI at the Core of Global Finance

India International Depository IFSC Limited (IIDI) stands at the forefront of India's growing global financial ecosystem at GIFT City. Established under the guidance of the International Financial Services Centres Authority (IFSCA), IIDI is building a unified, state-of-the-art depository for all classes of financial assets ranging from securities to bullion within the International Financial Services Centre (IFSC). Our vision is to create a seamless two-way bridge between Indian and global investors, powered by world-class technology, secure infrastructure and a trusted network of participants. Through its expanding ecosystem of Depository Participants including banks, brokers, custodians and Vault Managers supported by a robust technology platform and international best practices, IIDI is strengthening India's position as a credible and connected player in global finance.

Functioning as a unified international depository, IIDI facilitates the issuance of holding and transaction of eligible securities, including equity shares of eligible domestic companies, depository receipts, debt securities and other financial instruments permitted by IFSCA. This attracts wide spectrum of investors i.e., Foreign Individuals, Non-Resident Indians (NRIs), International Entities, Indian residents under the Liberalised Remittance Scheme (LRS) and Foreign Portfolio Investors (FPIs) to participate in India's global financial marketplace. By creating a transparent and secure infrastructure for these activities, IIDI enhances investor confidence and accessibility to international financial products.

IIDI has also been designated as the National Numbering Agency (NNA) for the GIFT IFSC jurisdiction under the global framework of the Association of National Numbering Agencies (ANNA). This recognition empowers IIDI to issue International Securities Identification Numbers (ISINs). The ISIN serves as a globally recognized identifier that ensures transparency, uniformity and efficient cross-border trading of securities.

IIDI also plays a critical role in India's bullion ecosystem as an International Bullion Depository. It provides vaulting and depository services for Bullion Suppliers, Jewellers and banks. Through its secure Vaults and trusted Depository Participants, IIDI facilitates the efficient import and settlement of bullion traded in the Bullion Exchange at GIFT IFSC. This initiative has not only positioned India as a major player in the global bullion market but also enhanced transparency, operational efficiency and ease of doing business for stakeholders in the precious metals sector.

With these initiatives, IIDI has become a cornerstone of the growing GIFT City ecosystem one that thrives on collaboration, credibility and global connectivity.

India's International Financial Services Centre (IFSC) at GIFT City, under IFSCA's progressive regulatory framework, continues to evolve into a dynamic hub for international finance. With its focus on advanced infrastructure, seamless connectivity and technology-driven operations, GIFT City stands as India's gateway to global finance poised to redefine the contours of international financial services.



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Mr. Sandip Shah** – Head- IFSC Dept.  
Gujarat International Finance Tec-City Co. Ltd  
(GIFT City)



**The New CMI Regulations, 2025:**

## Reshaping India's Global Capital Market Intermediary Landscape

### Introduction

India's growing prominence in global finance is exemplified by the rapid evolution of the Gujarat International Finance Tec-City (GIFT City) and its International Financial Services Centre (IFSC). Over the past five years, GIFT IFSC has emerged as a sophisticated and well-regulated ecosystem for international financial services, attracting over 700 registered entities and facilitating cross-border capital flows. The lifeblood of this market is its network of intermediaries—brokers, investment advisers, custodians, credit rating agencies, and more—who ensure that capital market operations remain liquid, transparent, and investor-friendly.

To enable these intermediaries to function effectively in a globally competitive environment, the International Financial Services Centres Authority (IFSCA) introduced the Capital Market Intermediaries Regulations, 2025 (hereafter, "New CMI Regulations"). Approved at the 23rd IFSCA Authority Meeting in March 2025, these regulations represent a landmark shift in the regulatory architecture governing capital market intermediaries in GIFT IFSC. Replacing the earlier 2021 framework, the New CMI Regulations aim to bring clarity, simplify categories, rationalize compliance burdens, and align more closely with international best practices—particularly those of the International Organization of Securities Commissions (IOSCO).

This article analyzes the key features of the New CMI Regulations, their implications for various types of intermediaries, and how these changes contribute to building a robust, credible, and globally integrated capital market platform in India's first IFSC.

### The Strategic Imperative for Reform

Capital market intermediaries serve as the connective tissue between issuers, investors, exchanges, and regulators. As GIFT IFSC aspires to become a preferred destination for global capital, its intermediary framework must balance ease of doing business with investor protection and systemic risk management. The earlier 2021 regulations, while pathbreaking, were limited by their reliance on fragmented circulars and lacked the operational maturity necessary for a rapidly growing financial centre.

The New CMI Regulations, 2025 are the culmination of several years of feedback from stakeholders—intermediaries, global investors, legal experts—and incorporate learnings from actual operations in the IFSC. They are designed to:

- Enhance regulatory certainty by replacing piecemeal circulars with codified regulation;
- Expand the breadth and specialization of intermediary categories;
- Strengthen the supervisory toolkit with audit mandates and net worth safeguards;
- Foster global interoperability through IOSCO-aligned definitions and practices.

## **New Intermediary Categories: Clarification and Expansion**

One of the defining features of the 2025 regulations is the restructuring and formalization of intermediary categories. Several activities previously governed by circulars have now been absorbed into a unified regulatory structure, making the regime more transparent and predictable.

### **Notably, the regulations:**

- Introduce a new category: Research Entities, which can publish securities analysis and investment reports. This move not only promotes informed trading but also encourages independent research in a jurisdiction that is attracting global listings.
- Incorporate ESG-focused entities: The newly defined category of ESG Ratings and Data Products Providers (ERDPPs) is a major advancement. These entities help assess ESG credentials of issuers and products, aligning IFSC markets with global ESG investing trends.
- Exclude redundant categories: The category of Account Aggregators—less relevant in an international capital markets context—has been removed.
- Clarify multiple registrations: Entities can now obtain multiple intermediary licenses (e.g., broker-dealer and clearing member) while initially appointing a common Principal or Compliance Officer. This provides operational efficiency during early-stage operations.

By harmonizing category definitions, the New CMI Regulations foster specialization while enabling synergy among different intermediary functions.

## **Rationalized Net Worth Requirements: Calibrated for Scale**

To attract a broad mix of global and domestic players, IFSCA has overhauled the net worth criteria, making them activity-specific, practical, and scale-sensitive. The updated thresholds strike a balance between ensuring financial soundness and lowering entry barriers, particularly for smaller firms and specialized service providers.

The new minimum net worth requirements include:

- Credit Rating Agencies (CRAs): USD 200,000 (reduced from USD 3–6 million under older norms)
- Investment Bankers: USD 100,000
- Investment Advisers: USD 25,000
- Broker-Dealers and Clearing Members: Net worth must consist only of liquid assets, enhancing liquidity readiness.

Furthermore, branches of foreign entities are permitted to allocate their parent entity's net worth toward IFSC operations. This facilitates entry of global financial firms without forcing capital lock-in at the local entity level, thereby boosting international participation.

These rationalized thresholds reflect IFSCA's intent to make GIFT IFSC a magnet for niche players—such as fintechs, ESG data firms, boutique investment houses—without compromising regulatory integrity.

## **Annual Compliance Audits and Officer Qualifications**

In keeping with IOSCO's core objectives of market fairness, transparency, and systemic stability, the New CMI Regulations mandate:

- Annual compliance audits to be submitted by all registered intermediaries by September 30 each year. These audits reinforce accountability and timely disclosure.
- Stricter qualifications for Principal Officers and Compliance Officers, especially for entities dealing in public funds or sensitive activities like underwriting or market making. Officers are now expected to demonstrate industry experience, regulatory understanding, and professional certifications.

Together, these measures enhance investor protection and reduce operational risk, creating a more credible marketplace for both domestic and international participants.

## Promoting Ease of Doing Business

A key objective of the 2025 regulations is to reduce unnecessary regulatory friction and offer greater operational flexibility to intermediaries. This is evident in several provisions:

- Consolidation of registration procedures for multi-role entities;
- Recognition of foreign documentation and approvals, reducing duplication;
- Transition flexibility: Existing intermediaries are allowed reasonable time to migrate to the new regulatory regime without disruption.

This ease-of-business orientation is vital for attracting new players—from UAE-based brokerage houses to Singapore-based ESG consultants—who might otherwise hesitate to enter an unfamiliar regulatory environment.

## Strengthening Global Competitiveness

What sets the New CMI Regulations apart is their conscious alignment with IOSCO principles, particularly:

- Ensuring fair, efficient, and transparent markets;
- Protecting investors via due diligence and fit-and-proper standards;
- Reducing systemic risk by insisting on liquid asset-based net worth requirements.

By adopting global best practices, IFSCA enhances GIFT IFSC's credibility as an alternative to international financial centers such as Dubai, Hong Kong, or Luxembourg. The inclusion of categories like ESG Ratings Providers and the creation of a regulatory sandbox for innovative capital market services further reflect the forward-looking, technology-enabled vision of IFSCA.

## Future Outlook: Scaling the Intermediary Landscape

As of early 2025, over 150 capital market intermediaries are operating in GIFT IFSC, supporting over USD 4 billion in average daily trading volume and USD 16 billion in assets under management. These numbers are poised to grow exponentially as:

- Dual listing mechanisms attract Indian and foreign issuers;
- The GASP framework opens up access for global investors;
- Tokenisation frameworks introduce new asset classes and market participants.

In this landscape, intermediaries are not just service providers—they are market architects, shaping liquidity, compliance, transparency, and investor confidence. The CMI Regulations of 2025 ensure that these intermediaries are equipped to meet global standards, innovate responsibly, and support India's aspiration to be a financial hub for the future.

## Conclusion

The Capital Market Intermediaries Regulations, 2025 mark a pivotal point in the evolution of GIFT IFSC. By restructuring categories, rationalizing financial norms, aligning with international standards, and reducing compliance friction, the regulations create a world-class environment for intermediary activity. As the financial services landscape becomes more global, digital, and ESG-focused, these regulations enable GIFT IFSC intermediaries to thrive as trusted, agile, and compliant actors in a competitive market.

India's IFSC is no longer an experiment—it is a model. And with the 2025 CMI Regulations, it is a model being fine-tuned for scale, credibility, and global impact.



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS



BY  
**Mr. Praveen Kamat**  
General Manager, Division  
of Market Infrastructure  
Institutions, Capital Markets  
Department, IFSCA

**Mr. Shubham Goyal**  
Assistant General Manager,  
IFSCA



## Regulatory Journey of Broker-Dealers and Remote Trading Participants in IFSC

### Introduction

The International Financial Services Centres Authority (IFSCA) was established on April 27, 2020, under the International Financial Services Centres Authority Act, 2019.

Section 13 of the IFSCA Act, 2019 came into force w.e.f. October 01, 2020. Thereafter, IFSCA became the unified regulator for development and regulation of financial products, financial services and financial institutions in the International Financial Services Centres (IFSC) in India. Prior to October 01, 2020, the domestic financial regulators, namely, RBI, SEBI, PFRDA and IRDAI regulated the respective verticals in IFSC.

SEBI issued the SEBI (IFSC) Guidelines in March 2015 for the capital market ecosystem in IFSC. The SEBI (IFSC) Guidelines were subsequently repealed by the various circulars and regulations issued by IFSCA. The regulatory framework for Broker-Dealers and other Capital Market Intermediaries was issued by IFSCA in form of IFSCA (Capital Market Intermediaries) Regulations, 2021 which have been superseded by the IFSCA (Capital Market Intermediaries) Regulations, 2025.

### Policy Measures undertaken by IFSCA for Broker-Dealers

To enhance the ease of doing business for Broker-Dealers in the IFSC and draw greater participation from foreign entities, IFSCA has undertaken various policy initiatives. The core initiatives are as follows:

#### *Market Access through Authorized Persons in foreign jurisdictions and India*

IFSCA has progressively expanded market access for its registered Broker-Dealers. To attract foreign investors on IFSC stock exchanges, the Authority first permitted Broker-Dealers to use Authorized Persons (APs) based overseas in October 2020. Subsequently, to facilitate access for resident Indian investors via the Liberalized Remittance Scheme (LRS) route - especially with the introduction of new products like Depository Receipts on US stocks, IFSCA also permitted the use of APs based in India, in April 2022.

## **Branch mode of operations for Indian Broker-Dealers in IFSC**

As per the SEBI (IFSC) Guidelines, 2015, entities were initially required to operate in the IFSC through a subsidiary structure. Later on, in July 2017, SEBI permitted branch form for all Capital Market Intermediaries other than Broker-Dealers and Clearing Members.

With the introduction of the IFSCA (Capital Market Intermediaries) Regulations, 2021, Broker-Dealers registered and regulated in India were also permitted to set up branch in IFSC. Recently, SEBI has also enabled the SEBI registered Stock Brokers to set up branch in IFSC in the form of a Separate Business Unit subject to adequate operational and financial segregation. These measures have now paved the way for Stock Brokers from the domestic jurisdiction to establish their presence in the IFSC through a branch structure.

## **IFSCA (Capital Market Intermediaries) Regulations**

IFSCA issued the IFSCA (Capital Market intermediaries) Regulations in October 2021 providing a unified regulatory framework for all capital market intermediaries in the IFSC including Broker-Dealers. These regulations inter-alia laid down the provisions for the requirements for grants of recognition, appointment of principal officer and compliance officer, obligations and responsibilities of intermediaries, code of conduct.

In April 2025, IFSCA further revised the regulatory framework by issuing the IFSCA (Capital Market Intermediaries) Regulations 2025. With respect to Broker-Dealers, the new regulations specify detailed qualification and experience requirements for principal and compliance officers, and mandate maintenance of net worth in the form of liquid assets.

## **Introduction of Sponsored Access in IFSC**

To align with global standards, IFSCA introduced Sponsored Access in June 2023. This mechanism functions as a form of Direct Market Access (DMA), permitting clients of a Broker-Dealer to transmit their orders directly to the Stock Exchange's trading system. By enabling this direct transmission, Sponsored Access supports ultra-low/low latency trading while helping preserve the confidentiality of complex, proprietary client strategies.

## **Settlement of Client's funds lying with Broker-Dealer**

Broker-Dealers in IFSC were initially required to transfer the unutilized funds back into client's account within the specified time depending on the client's mandate either on monthly or quarterly basis. Considering the costs associated with cross border fund transfer and to promote ease of doing business, the regulatory requirement of such monthly/quarterly settlement has been discontinued in March 2024. Such settlement of funds can now be done as per the Agreement/Consent Letter between the Broker-Dealer and its client subject to the norms specified by the Stock Exchanges.

## **Remote Trading Participants**

Despite several policy initiatives, participation of foreign brokers in IFSC has remained limited with majority of the Broker-Dealers in IFSC operating in the form of a subsidiary of their SEBI registered parent in India.

It was observed that many global jurisdictions permit the foreign entities to trade on their exchanges remotely subject to certain safeguards specified by the respective Exchanges or Regulator. Based on the practices prevalent in such global jurisdictions and to enhance the participation of foreign brokers, IFSCA permitted the foreign entities, not having a physical presence in IFSC, to trade directly on Stock Exchanges, on a proprietary basis, without a Broker-Dealer. Such entities were referred to as Remote Trading Participants (RTPs).

Initially, IFSCA permitted participation of RTPs only from 13 jurisdictions which was subsequently expanded to 28 jurisdictions in February 2025 subject to the conditions as under:

### **Conditions for an entity to be onboarded as RTP**

**1.** An entity regulated by the securities market regulator in its home jurisdiction is eligible to be onboarded by the Stock Exchange as RTP only after the following conditions are satisfied:

- a) The entity should be resident of FATF compliant jurisdiction and country whose securities market regulator is a signatory to the IOSCO MMoU or Bilateral MMoU with IFSCA.
- b) The entity should be a body corporate
- c) The entity shall be permitted to trade only on a proprietary basis in cash settled derivatives products
- d) The entity shall have an agreement with a clearing member registered with the IFSCA.

**2.** An entity not regulated by the securities market regulator in its home jurisdiction shall be eligible to be onboarded as RTP subject to the following:

**A.** The entity is a member of any of the following Stock Exchanges, or such other Stock Exchanges, as may be specified by IFSCA from time to time:

1	United States of America (USA)	<ul style="list-style-type: none"> <li>• New York Stock Exchange (NYSE),</li> <li>• National Association of Securities Dealers Automated Quotations (NASDAQ)</li> <li>• Chicago Mercantile Exchange (CME)</li> <li>• Intercontinental Exchange (ICE)</li> </ul>
2	Japan	Tokyo Stock Exchange
3	South Korea	Korea Exchange
4	United Kingdom excluding British Overseas Territories	London Stock Exchange (LSE)
5	France	Euronext, Paris
6	Germany	<ul style="list-style-type: none"> <li>• Frankfurt Stock Exchange</li> <li>• Eurex Exchange</li> </ul>
7	Canada	Toronto Stock Exchange
8	Singapore	Singapore Exchange (SGX)
9	Taiwan	Taiwan Stock Exchange
10	Israel	Tel Aviv Stock Exchange (TASE)
11	Australia	Australian Securities Exchange (ASX)
12	United Arab Emirates(UAE)	<ul style="list-style-type: none"> <li>• Abu Dhabi Securities Exchange (ADX)</li> <li>• Dubai Gold &amp; Commodities Exchange (DGCX)</li> <li>• Dubai Financial Market</li> <li>• NASDAQ, Dubai</li> </ul>
13	Netherlands	Euronext Amsterdam
14	Switzerland	SIX Swiss Exchange
15	South Africa	Johannesburg Stock Exchange
16	Indonesia	Indonesia Stock Exchange
17	Thailand	Stock Exchange of Thailand
18	Malaysia	Bursa Malaysia
19	Philippines	Philippine Stock Exchange
20	Saudi Arabia	Saudi Stock Exchange (Tadawul)
21	Ireland	Irish Stock Exchange
22	Sweden	Nasdaq Stockholm
23	Brazil	A Bolsa do Brasil   B3
24	Denmark	Nasdaq Copenhagen
25	Mexico	Mexican Stock Exchange
26	Vietnam	Hanoi Stock Exchange
27	Belgium	Brussels Stock Exchange
28	Nigeria	Nigerian Stock Exchange



**B.** The entity should be compliant with the conditions as mentioned at para 1(a) to 1(d) above.

**C.** The Stock Exchanges shall be responsible for specifying the terms and conditions for onboarding RTP, inter alia including the risk management measures and code of conduct in relation to the RTP.

**D.** The Stock Exchanges shall have operational flexibility to specify the net worth criteria, security deposit, application fee, annual fee and any other additional conditions for onboarding a RTP.

### Broker-Dealers as on October 31, 2025

As on September 30, 2020, there were 50 Broker-Dealers registered with IFSCA. As on October 31, 2025, the number of Broker-Dealers registered with IFSCA reached 92. These Broker-Dealers along with Remote Trading Participants have contributed to turnover of more than USD 100 Billion in the month of October 2025.

### Focus on Growth and Regulatory Streamlining

IFSCA has undertaken several regulatory measures to promote ease of doing business for the Broker-Dealers and success of these initiatives is evident from the steady increase in number of Broker-Dealers in recent years. To further encourage foreign participation, IFSCA has also permitted RTPs from foreign jurisdictions to trade remotely on the Stock Exchanges.

The recent decision by SEBI to permit the establishment of SBU in the IFSC has further streamlined the process for domestic Stock Brokers to set up their operations in an efficient and seamless manner. This development is expected to contribute to the continued growth in the number of Broker-Dealers in the IFSC. With the introduction of innovative products on the Stock Exchanges, these Broker-Dealers are anticipated to play a key role in enhancing market liquidity and deepening the capital market ecosystem in the IFSC.

In line with promoting regulatory clarity, IFSCA is issuing Master Circulars – single, consolidated reference points for all applicable regulatory requirements for its capital market entities. Master Circulars have already been released for various intermediaries, and a consultation paper for Stock Exchanges and Clearing Corporations was issued last month. IFSCA intends to follow up with a Master Circular specifically for Broker-Dealers, creating a unified regulatory guide for both existing and prospective Broker-Dealers in the IFSC.

### About the Authors

**Praveen Kamat** is General Manager with the Division of Market Infrastructure Institutions, Capital Markets Department, IFSCA. He joined IFSCA in September 2020 and has been instrumental in the rollout of key operational measures for Stock Exchanges and Broker-Dealers. Prior to joining IFSCA he was with the Securities & Exchange Board of India (SEBI).

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# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Mr. Meet S. Pandya**

Head - Business & Product Development,  
NSE International Exchange (NSEIX)



**India's Leap into Global Options Innovation:**

## Launch of ODTE Options on Nifty 50 Index at GIFT IFSC



### **A Defining Breakthrough for India's Global Financial Power Play**

India has taken a decisive leap forward in global finance — becoming the third jurisdiction in the world, and the first in Asia, to introduce Zero-Day-to-Expiry (ODTE) Options.

Third in the world. First in Asia. Built in India.

The launch of the India's first Zero-Day-to-Expiry (ODTE) Options on the Nifty 50 Index at the NSE International Exchange (NSEIX), housed within GIFT IFSC, is far more than a new product — it's a symbol of India's arrival as a global market innovator.

The ODTE Options debut reflects the IFSCA's progressive regulatory vision, NSEIX's agility and adaptability in product innovation, and the collective support of the ecosystem — together reflecting a shared commitment to building GIFT IFSC into a world-class financial center powered by innovation, trust, and global alignment.

### **Global Evolution of ODTE Options**

First pioneered in the United States, these contracts emerged as tools for sophisticated traders to fine-tune intraday risk and volatility exposure. Over time, they evolved into one of the most liquid and dynamic trading instruments globally — reshaping how institutional investors, hedge funds, and traders manage risk and express short-term views.

Building on the U.S. success, Europe — led by Eurex — followed suit, offering daily-expiry options on the EURO STOXX 50 and DAX index. Until now, these two regions — the U.S. and Europe — were the only global jurisdictions to host such advanced, high-frequency derivatives products.

Over time, the surge in ODTE volumes has transformed global options markets, now contributing a substantial share of daily trading activity. These products have emerged as a new engine of liquidity, enhancing market depth, tightening spreads, and improving price discovery across the options curve. By enabling participants to express tactical intraday views and manage volatility efficiently, ODTE options have strengthened market resilience and inclusiveness — proving how innovation, backed by sound regulation and robust infrastructure, can redefine the contours of global market efficiency.

And now, India joins this elite league. A strong signal that the India's first international financial center now stands alongside Wall Street and Europe in product innovation and market infrastructure.



## India's First ODTE Options: Made in GIFT IFSC, Built for the World

Commencing 13 October 2025, the introduction of 'GIFT Nifty 50' ODTE Options at NSEIX symbolizes India's financial maturity and its readiness to align with global best practices. Anchored on the Nifty 50 Index, India's flagship benchmark known for its liquidity and transparency, this product gives market participants the tools to manage short-term risk exposures with precision, execute intraday volatility and delta strategies efficiently and enhance price discovery and hedging opportunities across timeframes.

ODTE Options are supported by a robust, globally aligned risk management framework implemented by our clearing arm - NSEICC, incorporating portfolio-based margining, real-time risk monitoring, and intraday updates of margin parameters to ensure market integrity and stability in line with international best practices.

Underlying Asset	NIFTY 50 Index
Symbol	NIFTY
Tick Size	US \$ 0.01
Lot Size	US \$ 2 X Nifty 50 Index
Expiry date	Five serial Weekly expiries from Monday to Friday expiring on daily basis

On each trading day, ODTE Options contracts expire at 3:30 PM IST, marking the close of that day's trading cycle. Immediately after expiry, new ODTE Options contracts are introduced for trading, ensuring that five serial weekly expiry contracts remain continuously available in the market.

For more information pls refer - [https://www.nseix.com/api/content/circulars/NSEIFSC\\_TRADE\\_2347.pdf](https://www.nseix.com/api/content/circulars/NSEIFSC_TRADE_2347.pdf)

With the launch of ODTE Options on the Nifty 50 Index at NSEIX, GIFT IFSC becomes the third global jurisdiction — and the first in Asia — to introduce this revolutionary innovation. This breakthrough firmly establishes India as a frontline innovator in global capital markets, not just adapting to international best practices but actively setting new benchmarks for agility and innovation. It highlights the progressive regulatory foresight of IFSCA and the world-class trading and clearing infrastructure of NSEIX, both of which have made this global-first possible from Indian soil.

### Strengthening the GIFT IFSC Ecosystem

The launch of ODTE options is a strategic advancement in GIFT IFSC's evolution as a global financial hub. It complements the broader policy vision of IFSCA — to promote innovation-led market development that is globally competitive and investor-centric. This product is expected to deepen liquidity within the Nifty derivatives ecosystem, creating stronger linkages between IFSC and Global markets. It will expand arbitrage and hedging opportunities for a wide range of participants and is poised to attract greater engagement from international investors, proprietary trading firms, and market makers. In addition, the globally aligned framework at GIFT IFSC opens avenues for foreign retail investors — including NRIs and OCIs — to efficiently access India linked instruments through a sophisticated, innovation-driven marketplace.

### Looking Ahead: Advancing Innovation from the Front Foot

The successful rollout of ODTE Options is the outcome of a collective effort — led by IFSCA's progressive forward-looking approach, the market-building initiatives of NSEIX, and strong support from market participants across the GIFT IFSC ecosystem. This collaboration exemplifies how policy vision, market expertise, and industry partnership can converge to deliver globally benchmarked financial products from Indian soil.

As we look ahead, NSEIX remains firmly committed to driving innovation from the front foot — continuously introducing globally competitive products that meet the evolving needs of investors and traders. The ODTE Options mark the beginning of a bold new chapter — where GIFT IFSC emerges as Asia's innovation hub, bridging global markets and India's economic potential.



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Mr. Ritesh Kumar**

Head, Business Development & Marketing, India INX



## Where India Trades with the World: Inside the India INX Revolution

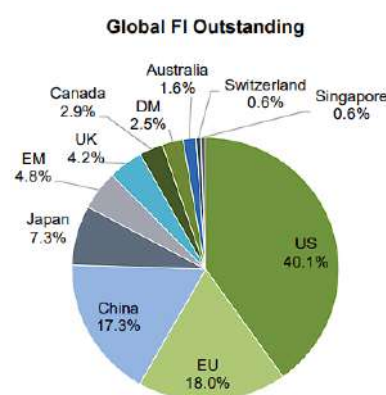
**Mapping the Global Asset Universe:** The global financial landscape exceeds \$246.8 trillion, according to LSEG & World Federation of Exchanges.

- **Equities:** \$65 trillion (2015) \$126.7 trillion (2024)
- **Fixed Income:** \$80 trillion (2015) \$140.7 trillion (2023)
- **Alternatives:** \$7.2 trillion (2014) \$18.2 trillion (2024), projected \$29 trillion by 2029.

Cross-border payments have surpassed \$1 quadrillion annually, reflecting the integration of global capital-with India increasingly central to this flow.



Source: world federation of exchanges, SIFMA estimate.



Source: Bank of International Settlements (BIS), SIFMA.

**Inflows into Indian financial assets are expected to cross \$9.5 trillion over the next decade (Goldman Sachs), with equity and mutual funds projected to attract \$0.8 trillion, and bank deposits around \$3.5 trillion.** By 2025, India counts nearly 200 million demat accounts, reflecting an unprecedented rise in retail investor engagement.

### India Steps Up: Building the Core of Global Capital

India's market capitalization rose from \$1.6 trillion (2010) to \$5.5 trillion (2025). Mutual fund AUM increased tenfold to approximately ₹72 trillion. The corporate bond market now contributes 18% of GDP, up from 6% a decade earlier. With GDP growth projected at 6.5-7% India's rise is structural and sustained.

## GIFT City: India's Global Financial Hub

Every financial hub-London, Singapore, New York-began with one idea: connect global capital with domestic opportunity. India's answer is GIFT City, housing the nation's first International Financial Services Centre (IFSC). With 1000+ registered entities, it integrates global banking, insurance, capital markets, and fintech under one regulatory roof, offering tax efficiency, transparency, and scale.

## India INX: Where Investors Gain the Edge

At the heart of GIFT City lies India International Exchange (India INX), inaugurated in 2017. Operating 22 hours a day, five days a week, India INX provides access to equities, derivatives, commodities, currencies, and debt-within India's regulatory perimeter. Its colocation facility enables ultra-low latency trading for HFT firms, and our own in-house mobile application provide easy access to retail individual clients globally.

India INX provides single segment for all exchange traded products. Single segment enables margin fungibility across asset classes enhances capital efficiency for clients and member brokers of exchange

**Product Spectrum:** India INX offers USD-settled BSE SENSEX futures, commodity and currency derivatives, and over 150+ debt listings worth USD 61 billion. The USD-settled BSE SENSEX Futures-India's oldest benchmark (since 1986)-allow NRIs and global investors exposure to India's premier equity index with tax and currency efficiency.

## BSE SENSEX Futures: A Global Window into India's Growth Story

The USD-settled BSE SENSEX Futures are India INX's flagship equity derivative-offering global investors a direct, efficient, and tax-advantaged gateway to participate in India's most iconic stock market index. Operating on a three-month rolling cycle with monthly expiries, the contract ensures currency stability through USD settlement, eliminating exchange rate risk. Monthly expiry of contract is last Thursday of the month aligned with Sensex futures monthly contract expiry of BSE Limited.



Figure 5: SENSEX Futures 1 year Growth Chart

Exclusively available to NRIs and foreign investors, the product combines cost efficiency and fiscal incentives. Beyond access, it provides exposure to India's diversified economic sectors, driven by a robust and transparent regulatory ecosystem.

Recognized as India's oldest and most trusted index, the SENSEX reflects 30 of the nation's strongest and most liquid companies. Its global relevance, high liquidity, and transparent methodology make it a strategic diversification tool for international portfolios.

For international investors, the BSE SENSEX Futures serve as both an entry point into India's equity growth story and a gateway to participate in the broader India INX ecosystem-where liquidity, innovation, and opportunity converge.

Complementing this, the **Global Securities Market (GSM)** platform at India INX enables issuers to raise capital seamlessly through a four-step process—consultation, in-principle approval, final listing, and ongoing compliance. With 150+ debt listings from premier institutions such as Asian Development Bank, NTPC, PFC, REC, Reliance, Adani Green, and Adani Ports, India INX has established \$83.6 billion in Medium Term Note (MTN) programs and listed nearly \$61.7 billion in debt securities. This positions India INX on par with global giants like the London, Luxembourg, and Singapore exchanges in efficiency, transparency, and credibility, reflecting its strong market presence and robust issuer base.

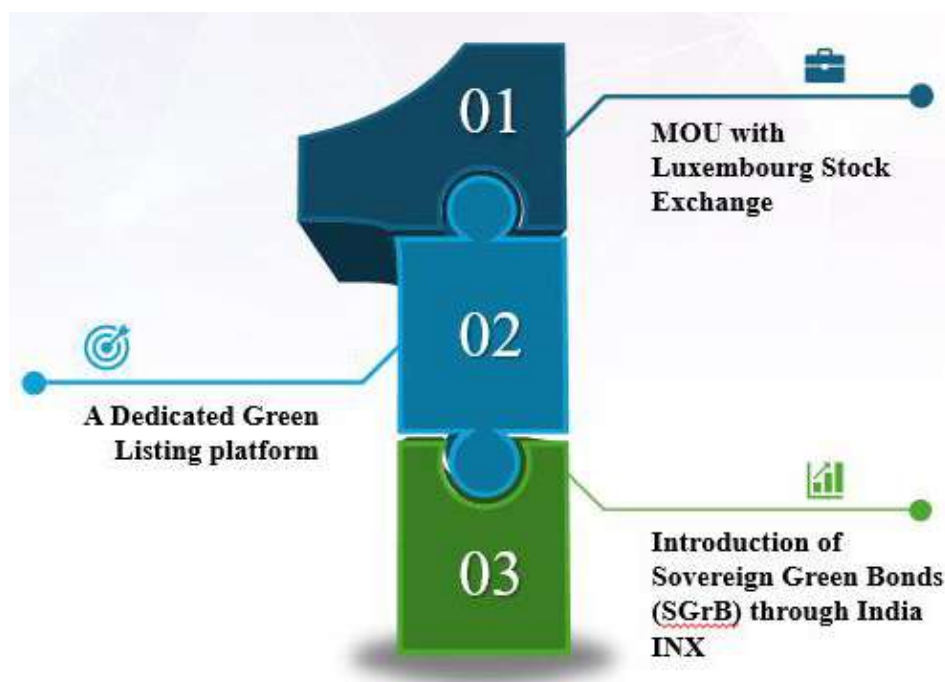


Figure 6: India INX GSM Green Platform

Adding to its prestige, Asian Development Bank and Development Finance Corporation of Ceylon (DFCC) Bank, Sri Lanka have selected India INX for their global listings, reinforcing the exchange's appeal among top-tier international institutions seeking efficiency, credibility, and instant cross-border exposure.

An exclusive Memorandum of Understanding (MoU) between India INX and the Luxembourg Stock Exchange is an important highlight that signifies India INX's strategic partnership to enhance ESG bond listings and international collaboration. This MoU enables India INX to leverage Luxembourg's expertise in green and sustainable finance, contributing to India INX's leadership with over \$14 billion in ESG bond volume.

Marking a new era, First Draft Red Herring Prospectus (DRHP) to list equity shares filed on India INX. Upcoming IPOs includes a fresh issue & offer-for-sale, signalling a major shift from debt focused to primary equity issuance at GIFT IFSC. The upcoming equity listing positions GIFT City alongside global financial hubs, offering Indian companies direct access to international capital without leaving the country. Similarly, avenues are open for foreign companies to list their shares on India INX.

### Technology That Trades the Indian Story

India INX's Bolt Plus on Web (BOW) enables seamless execution, portfolio tracking, and real-time analytics. Its mobile platform extends secure access for global investors—transforming participation in India's markets into a frictionless experience.



## India INX Global Access: Taking Indian Portfolios Global

India INX Global Access (INX GA), the Global arm of India INX, established in 2018 under IFSCA regulation, offers Indian investors one-window access to leading global exchanges across multiple countries. It enables trading in equities, ETFs, bonds, and mutual funds within the RBI's USD 250,000 LRS limit. It also enables trading in derivatives on global exchanges to GIFT based entities. Through international brokerage partnerships, it simplifies compliance and reduces costs. India INXGA offer easy to consume APIs for GIFT City based brokers and mobile application to retail individual clients.



Figure 7: India INX Global Access Turnover

## Facilitating Seamless Global Access

The IFSCA Global Access Platform (GAP) Framework circular (Aug 2025) simplify and enhance global investing. For brokers, they relax norms for securities activities in GIFT City, enabling seamless cross-border operations. This clarity reduces barriers, lowers costs, and expands opportunities.

Integrated technology, global partnerships, and transparent regulation make India INX Global Access India's most trusted route to global markets-bridging Indian capital with world opportunity.

## India ICC: The Trust That Keeps Markets Moving

The India International Clearing Corporation (India ICC), a BSE subsidiary, ensures secure, globally compliant settlement for all India INX and India INX GA transactions. Operating under PFMI standards, it provides real-time clearing, margining, and collateral management-safeguarding investor trust and market stability.

## The Future of India INX: Expansion and Empowerment

India INX continues to expand liquidity, simplify access, and strengthen its global reach. As GIFT City evolves into Asia's most integrated offshore hub, India INX will anchor India's connection to global capital. As India moves toward Viksit Bharat 2047, India INX stands as both symbol and strategy-empowering investors, funding growth, and positioning India as a credible global capital centre.

## Shaping India's Financial Destiny

Every portfolio is a reflection of foresight. Is yours future-ready? Does it capture India's evolving role in global finance? If not, it's time to look beyond the familiar-to where India trades with the world: India INX, GIFT City.

# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS



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## Plug-and-Play Fund Management:

# Third Party Management Service Paves the Way for Global Fund Access through GIFT City

## Reimagining Fund Management at GIFT IFSC

Over the past few years, GIFT City's International Financial Services Centre (IFSC) has steadily evolved from a nascent offshore enclave into a maturing jurisdiction aspiring to rival established global financial hubs. The International Financial Services Centres Authority (IFSCA) constituted under the International Financial Services Centres Authority Act, 2019 has progressively developed a regulatory architecture that balances prudence with innovation. This evolution reflects India's aspiration to position GIFT IFSC as a global fund management destination, where international and domestic investors can access sophisticated financial products within a well-governed framework.

The introduction of the International Financial Services Centres Authority (Fund Management) Regulations, 2025 marked a significant step toward this goal. These principal regulations consolidated fund management activities under a unified structure, encompassing categories such as retail and non-retail fund management entities (FMEs), portfolio management services, and alternative investment schemes. The subsequent Amendment Regulations, 2025, notified on 24 July 2025, introduced a novel regulatory construct, Third-Party Fund Management Services (TFMS), under Part D of Chapter VI. This addition is emblematic of GIFT City strategic move towards creating a "plug-and-play" model that attracts global fund managers seeking a compliant yet low-friction entry point into India's international finance ecosystem.

Under the TFMS framework, an external fund manager (EFM) may launch and manage restricted schemes in collaboration with a registered FME without establishing a physical presence within the IFSC. This structural innovation offers operational flexibility while retaining regulatory oversight through the FME, which remains accountable to regulators for compliance, governance, and fiduciary obligations. The approach is particularly aligned with GIFT City broader vision of fostering cross-border financial intermediation and capital pooling, enabling India to participate in the global fund management value chain.

Globally, similar platform-based models have been instrumental in positioning jurisdictions like Singapore and Luxembourg as fund domiciles of choice. Singapore's Variable Capital Company (VCC) framework, for instance, enables external managers to operate flexible fund structures with centralised oversight, while Luxembourg's Reserved Alternative Investment Fund (RAIF) allows fund promoters to establish vehicles without prior regulatory approval, relying instead on registered AIFMs for compliance. The TFMS regime mirrors these global best practices but contextualises them within India's regulatory ethos of accountability, transparency, and incremental liberalisation.

By institutionalising such a hybrid model, GIFT City is effectively bridging the gap between international investor expectations and domestic regulatory prudence. The TFMS framework is therefore not merely an administrative reform it is a strategic regulatory innovation aimed at transforming GIFT IFSC into a gateway for global capital flows and a credible fund management jurisdiction anchored in rule-based supervision.

### **Inside the TFMS Framework: Structure and Scope**

The International Financial Services Centres Authority (Fund Management) (Amendment) Regulations, 2025, notified on 24 July 2025, inserted Part D "Third-Party Fund Management Services" into Chapter VI of the principal Fund Management Regulations, 2025. This part spanning Regulations 107A to 107M establishes the comprehensive legal and operational framework governing the Third-Party Fund Management Services (TFMS) model at GIFT IFSC. The intent is to provide a controlled entry channel for external fund managers (EFMs) to participate in India's international financial ecosystem without the burden of establishing a substantive physical presence.

At the core of the framework lies Regulation 107A, which empowers a registered Fund Management Entity (FME) to launch and manage a scheme on behalf of a third party. This mechanism allows an FME already licensed under the principal Fund Management Regulations to extend its platform to external fund managers. Regulation 107B defines third-party fund management services as activities wherein a registered FME manages schemes for a third party, while a third-party fund manager is defined as an entity that is duly registered or regulated in its home jurisdiction for fund management, portfolio management, or investment advisory activities. This definition anchors the model in international legitimacy, ensuring that only credible, regulated EFMs participate in the ecosystem.

The roles and responsibilities between the FME and the EFM are carefully delineated. The FME functions as the regulated interface with IFSCA and remains responsible for full compliance, disclosures, risk management, and investor protection obligations. Regulation 107C(4) explicitly provides that, irrespective of any contractual indemnity arrangement, the FME shall continue to be liable for all obligations and liabilities arising out of the third-party fund management arrangement. The EFM, on the other hand, contributes expertise in investment strategy, fund design, and portfolio management, but must operate within the compliance perimeter set by the FME. This structure ensures that the regulatory line of accountability is never diluted, even as operational flexibility is enhanced.

Further, the legal form of the FME under Regulation 107D is restricted to entities established within GIFT IFSC as either a company, a limited liability partnership (LLP), or any other form permitted by the Authority. Such entities must expressly include in their constitutional documents a provision enabling them to offer third-party fund management services. Additionally, Regulation 107E mandates that for each scheme managed under the TFMS model, the FME must appoint a dedicated Principal Officer (PO) responsible for fund management, risk management, and compliance. This scheme-specific governance model underscores the principle of scheme-level accountability.

The financial safeguards embedded in the framework further ensure prudential stability. Regulation 107F requires every FME seeking authorization to provide TFMS to maintain an additional net worth of USD 500,000 (or such other amount as may be specified). This requirement is distinct from, and in addition to, the baseline net worth obligations applicable to FMEs under the principal regulations. The rationale is to ensure that FMEs hosting third-party operations possess adequate financial resilience to absorb potential operational or compliance risks arising from such delegated structures.

As for scheme eligibility, Regulation 107G(1) confines the TFMS model to restricted schemes a class of schemes generally accessible only to sophisticated or institutional investors thereby excluding retail participation at the outset. Each scheme is capped at a maximum corpus of USD 50 million, representing a cautious approach by IFSCA to pilot the model within a controlled scale. This limitation reflects a sandbox-like philosophy promoting experimentation with regulatory safeguards before permitting larger exposures. Notably, Regulation 107G(2) also deems the third party to be an associate of the FME for compliance purposes, thereby ensuring that conflict-of-interest provisions and related-party safeguards apply with equal force.



In sum, the TFMS framework achieves a delicate equilibrium: it liberalises access by allowing cross-border participation while centralising accountability within an IFSC-regulated entity. By architecting a model that accommodates external expertise without fragmenting oversight, the IFSCA has set a precedent in India's regulatory landscape one that mirrors the sophistication of international fund jurisdictions while preserving domestic prudential integrity.

### **Balancing Access and Accountability: Regulatory Safeguards**

The Third-Party Fund Management Services (TFMS) framework is built upon the dual pillars of access and accountability a defining characteristic of regulatory approach. While the model enables external fund managers (EFMs) to operate within GIFT IFSC without establishing physical presence, it does not compromise on investor protection or regulatory control. Through a combination of scheme-level governance, risk management, and enhanced disclosure norms, the Authority has embedded several safeguards that uphold the integrity of India's emerging international financial ecosystem.

A cornerstone of this framework is the appointment of a dedicated Principal Officer (PO) for every scheme launched under the TFMS model, as mandated under Regulation 107E(1). The PO serves as the focal point for fund management, risk management, and compliance functions specific to that scheme. This provision ensures scheme-level accountability, aligning with the regulators supervisory philosophy that each fund regardless of its sponsor or external manager must have an identifiable, qualified individual responsible for day-to-day oversight. For retail and non-retail FMEs, the regulations also differentiate compliance structures to prevent overlaps and ensure focused supervision. This mechanism not only enhances transparency but also strengthens fiduciary accountability for investor protection.

Complementing the PO requirement, Regulation 107J introduces a comprehensive risk management architecture that FMEs must implement. The regulation mandates internal policies encompassing risk identification, mitigation, and periodic internal audits to ensure adherence to the Fund Management Regulations, 2025. Crucially, it requires segregation of funds and operational independence between self-managed and third-party-managed schemes thereby preventing contagion risk across portfolios. It further extends existing grievance redressal systems to cover investors in TFMS-managed schemes, ensuring parity in investor recourse mechanisms. Additionally, FMEs are obligated to conduct periodic internal audits and reviews, reporting their findings to fiduciaries, thereby embedding a culture of proactive compliance.

Another essential safeguard is the robust disclosure regime prescribed under Regulation 107I. Every Placement Memorandum (PPM) for a restricted scheme managed under TFMS must contain a dedicated section detailing the identity of the third-party manager, its key personnel, and a delineation of responsibilities between the FME and the EFM. The PPM must also highlight potential conflicts of interest inherent in third-party arrangements and outline the measures proposed to avoid, resolve, or mitigate such conflicts. This transparency framework mirrors international best practices in jurisdictions like Singapore and Luxembourg, where investor protection hinges on full and fair disclosure rather than intrusive intervention.

Furthermore, the regulation has instituted a mandatory indemnification mechanism under Regulation 107K(1)(h), requiring that a suitable arrangement be in place to indemnify the FME from any potential liabilities arising from the operations of the third-party fund manager. This ensures that while the FME retains ultimate responsibility, it is also contractually protected against operational lapses attributable to the EFM. The regulation also obligates FMEs to undertake continuous monitoring of third-party activities, maintain the ability to terminate the arrangement in investors' interest or upon direction of the Authority, and conduct ongoing performance reviews of third-party service providers.

The sandbox-style design of the TFMS framework further exemplifies calibrated liberalisation strategy. By capping the corpus of each TFMS-managed restricted scheme at USD 50 million and confining participation initially to sophisticated investors, the Authority effectively transforms GIFT IFSC into a regulatory testbed for innovation in fund management. This controlled experimentation allows regulators to observe operational dynamics, assess systemic risks, and refine regulatory mechanisms before scaling the framework to larger or retail-oriented models. Such an incremental approach resonates with the Authority's broader commitment to innovation-led financial inclusion, where policy agility is balanced by prudential supervision.

Collectively, these regulatory safeguards demonstrate that the TFMS model is not an exercise in deregulation, but rather a strategic recalibration one that expands market access while upholding the highest standards of investor protection and governance. The interplay of disclosure, accountability, and structured risk management reinforces GIFT IFSC's credibility as a jurisdiction that welcomes innovation without compromising on regulatory discipline.

## A Step Toward Global Competitiveness

The introduction of the TFMS framework marks a deliberate move to elevate GIFT IFSC's standing among the world's leading fund domiciles. Until recently, India's offshore financial intermediation capabilities lagged behind jurisdictions such as Singapore, Luxembourg, and Hong Kong, where fund managers benefit from flexible operational structures and internationally recognized legal frameworks. By allowing External Fund Managers (EFMs) to launch schemes without physical presence—while retaining regulatory accountability through Fund Management Entities (FMEs), the vertical itself has positioned GIFT City as a globally compatible, structurally efficient, and innovation-friendly jurisdiction. This is a significant step toward establishing GIFT City IFSC as a gateway for international capital flows into India and the broader South Asian investment corridor.

For international fund managers, the TFMS model represents a low-friction entry channel to access India-linked investment opportunities without incurring upfront costs associated with establishing presence, relocating staff, or navigating new compliance landscapes. Family offices and boutique managers particularly those managing tailored investment mandates stand to benefit from the framework's operational flexibility and cost-efficiency, allowing them to test strategies before committing to scale. Meanwhile, niche fund strategies such as climate-transition funds, fintech innovation funds, special situations vehicles, and thematic global allocation funds can leverage the TFMS model to structure pilot strategies under a controlled regulatory environment, thereby bridging global investment ideation with Indian capital market depth.

Looking ahead, the TFMS framework has the potential to catalyze cross-border fund mobility, facilitating smoother participation of foreign funds in Indian financial assets and vice versa. With demonstrated uptake and positive supervisory outcomes, the regulators may consider lifting corpus caps, introducing retail participation in stages, or enabling multi-tiered fund structures similar to Singapore's Variable Capital Company (VCC) or Luxembourg's umbrella sub-fund frameworks. Over time, the TFMS regime may also become a tool of financial diplomacy, allowing India to expand its influence in the global capital architecture by positioning GIFT IFSC as a neutral and trusted platform for emerging market fund flows.

The TFMS framework therefore not only enhances the competitiveness of GIFT IFSC but also aligns with India's larger strategic ambition: transitioning from a primarily domestic capital market to a globally integrated financial ecosystem capable of shaping investment narratives across regions.

## Conclusion and Way Forward

The TFMS framework represents a measured yet progressive stride in India's journey toward global financial integration. By combining operational flexibility for foreign fund managers with strong regulatory guardrails and FME-centered accountability, the regulators have crafted a model that is globally recognizable, institutionally prudent, and domestically strategic. It underscores a broader regulatory philosophy—liberalization without regulatory vacuum, innovation without investor vulnerability.

However, the long-term success of this framework will depend on several factors: the willingness of FMEs to actively develop platform infrastructure; the responsiveness of EFMs to explore GIFT City IFSC as a viable launch jurisdiction; continued regulatory clarity; and readiness of professional service providers to support cross-border fund structuring. As market confidence deepens, the TFMS model may naturally evolve into more expansive fund structures and wider investor participation.

In essence, this framework is not merely a regulatory update but a strategic signal that GIFT IFSC is ready to compete, collaborate, and co-create with the world's leading financial hubs. The pathway ahead is promising, and with sustained regulatory stewardship, the TFMS initiative could serve as a cornerstone in positioning India as a global fund management powerhouse.

# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS

BY **Ms. Namrata Trivedi** - Managing Partner  
**Ms. Charmy Patel** - Partner

**Raval & Trivedi Associates**



**Raval & Trivedi Associates at GIFT IFSCA:**

## Bridging Gujarat's Legal Legacy with Global Financial Vision

Raval & Trivedi Associates was established in 2015 to be a full-service law firm catering to a variety of different needs. It carries forward a legacy of over five decades of professional excellence in litigation and advocacy from its predecessor R.J. Raval Associates to create a dynamic firm that blends traditional legal precision with modern, global sensibilities.

Guided by a vision that law must evolve alongside the markets it serves, Raval & Trivedi Associates has redefined the contours of traditional practice to blend doctrinal rigor with agility and experience to ensure that each client engagement reflects both integrity and innovation. Recognized for its consistent pursuit of excellence and forward-thinking approach, the firm has been listed among the Top Law Firms in India by the Forbes Legal Powerlist 2023-24.

Innovation and adaptability are cornerstones of the firm's philosophy. Anticipating the digital transformation of the legal profession, Raval & Trivedi Associates has invested heavily in technology, developing its own proprietary legal application through a dedicated in-house IT and R&D team. This initiative streamlines internal processes, enhances client communication, and reflects the firm's commitment to efficiency and transparency in legal service delivery.

### **Becoming a Part of GIFT City's Vision**

The firm's engagement with GIFT City began in 2021, at a time when India's first operational smart city and international financial services hub was rapidly evolving into a nucleus for global finance, fintech innovation, and cross-border economic collaboration. Recognizing the immense potential of the International Financial Services Centres Authority (IFSCA) as a regulator of global standards, Raval & Trivedi Associates expanded its presence by registering its office within GIFT City in 2023.

This expansion marked a historic milestone, making Raval & Trivedi Associates the first Gujarat-based local law firm to be regulated by IFSCA. The decision signified more than geographical expansion. It reflected the firm's deep-rooted belief in contributing to Gujarat's emergence as a world-class financial destination. The firm's GIFT branch has since become a hub for engagement with new-age clients, including funds, fintech and techfin ventures, NBFCs, ship leasing companies, intermediaries, and ancillary service providers exploring opportunities within the GIFT framework.

Through its consistent involvement with GIFT IFSCA, the firm has developed a robust understanding of the regulatory ecosystem, enabling it to provide strategic and compliant pathways for entities wishing to establish, operate, and grow within this jurisdiction. Its team closely follows policy developments and regulatory evolutions, ensuring clients remain aligned with the most current frameworks as GIFT City continues to scale new heights.



## Comprehensive Legal and Consultancy Solutions

At GIFT City, Raval & Trivedi Associates serves as a single-window solution for all legal, compliance, and consultancy needs. The firm's service spectrum is designed to support clients at every stage of their journey from inception and setup to day-to-day operations and post-establishment compliance.

For entities seeking to establish a presence within GIFT IFSCA, the firm provides strategic guidance on structuring and incorporation, helping clients navigate the complex regulatory landscape with clarity and efficiency. Whether it involves setting up investment funds, NBFCs, fintech or techfin ventures, ship leasing structures, or ancillary service entities, Raval & Trivedi Associates assists in identifying the most suitable structure, preparing incorporation documents, and obtaining necessary approvals from IFSCA and other relevant authorities.

Beyond the initial setup, the firm offers comprehensive support on ongoing legal and regulatory compliance. It assists clients in interpreting and implementing IFSCA regulations, understanding of cross-border implications, and maintaining transparent and timely reporting practices. By integrating legal insight with business strategy, the firm ensures that compliance becomes an enabler of growth rather than a constraint.

The firm's strength also lies in its depth of documentation and transactional expertise. Its lawyers meticulously draft and review agreements, financial contracts, and operational frameworks to safeguard clients' interests while ensuring full compliance with applicable laws. Whether advising on fund formation, fintech operations, leasing transactions, or technology-led business models, the firm's approach combines legal precision with commercial sensibility.

Complementing its legal services, Raval & Trivedi Associates provides strategic consultancy for businesses looking to explore the GIFT ecosystem. The firm helps clients understand the unique advantages of operating within GIFT City, guiding them through tax incentives, regulatory benefits, and international business facilitation mechanisms. This advisory role extends beyond legal boundaries, positioning the firm as a holistic partner for entities aspiring to participate in India's international financial growth story.

## Looking Ahead

As GIFT City continues its journey to becoming a global centre for financial innovation, collaboration between regulators, service providers, and professional advisors will remain key to its success. At Raval & Trivedi Associates, we see our role not just as legal advisors but as active partners in this growth story facilitating clarity, compliance, and confidence for every entity entering the GIFT ecosystem.

Through our ongoing work with brokers, fintechs, funds, and ancillary service providers, we remain committed to supporting the shared vision of the GIFT Brokers Association: building a transparent, efficient, and globally competitive marketplace.

By blending Gujarat's legal legacy with forward-looking innovation, Raval & Trivedi Associates continues to contribute meaningfully to GIFT City's evolution, helping transform it from a promising concept into a thriving international financial hub.



# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS



BY  
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## Zero-Day Options: Balancing Innovation with Market Vigilance

The financial markets are constantly innovating to keep pace with technological advancements and meet risk appetite of traders. One such innovation which has made rapid ascent in international markets is Zero-Day-to-Expiry (ODTE) options. These contracts expire on a given trading day, i.e. positions are taken on the same day when the contract expires. Even the contracts with quarterly, monthly or weekly expiries technically qualify as ODTE options, on their day of expiry. CBOE in 2022 completed its suite of options contracts with weekly expiries on S&P 500 Index (SPX) with expiry on each trading day of the week. Through this weekly options suite, CBOE provided traders and investors to gain exposure to ODTE options on each trading day in form of weekly options. Since then, there has been a rapid surge in volumes with SPX ODTE Options contributing over 50% of total SPX derivatives volume in the first quarter of 2025.

CBOE has attributed the success of these contracts on its platform to the participation of retail investors. It estimates the contribution of retail in SPX ODTE Options trading at 50-60% and rest by institutional traders.

Apart from CBOE, the only other stock exchanges to offer ODTE options are Eurex and Euronext in Europe and NSE IX in GIFT IFSC.

NSE IX introduced the ODTE options on NIFTY on October 13, 2025 with IFSCA's approval. The launch in GIFT IFSC is linked to IFSCA's Global Securities Markets Conclave 1.0 held in January 2025 in GIFT City, where IFSCA publicly floated the idea in one of the discussion panels.

## **The Proposition of ODTE in GIFT IFSC**

As evident from the available data, ODTE options have rapidly gained traction. The availability of ODTE options positions GIFT IFSC as a forward-looking and competitive global hub that caters to the needs of sophisticated investors seeking financial instruments innovatively designed for modern trading demands.

ODTE options on NIFTY50 index have the potential to enhance market depth by offering a cost-effective, intraday tool to manage risk in USD for their India exposure.

Typically, ODTE options offer lower premium costs and margin requirements compared to longer-dated options contracts, making them particularly appealing for capital-light trading strategies. This efficiency is especially beneficial for active traders and proprietary desks, as it minimizes capital lock-up and allows for greater flexibility in managing intraday exposures.

## **The Scale and Structural Risk of Ultra-Short Duration Contracts**

The popularity of ODTE options is partly driven by structural changes, specifically the expansion of expiration cycles by major stock exchanges, allowing options to be available every weekday. For experienced traders, ODTEs offer flexibility, the chance to capitalize on short-term price movements, and the advantage of not being exposed to overnight risk.

Notwithstanding the benefits, the inherent characteristics of ODTE options introduce complexity and significant risk. These contracts tend to be marked by high leverage and have acute sensitivity to price fluctuations in the underlying asset (high DELTA and GAMMA).

## **Strategies and the Pursuit of Premium**

The rise of ODTEs has fostered specialized trading strategies. Many sophisticated participants favor becoming option writers (sellers) to capitalize on the exponential time decay of the premium (high THETA). Popular selling strategies include combinations like selling call or put spreads and iron condors. For example, the strategy of selling a put spread is employed when a trader believes that the market will not move downwards, accepting limited risk in exchange for collected premium. Other participants use ODTEs to buy outright calls and/or puts to tactically trade around market events or hedge longer-dated portfolios.

## **Transparency, Complexity and Investor Competence**

From an oversight perspective, investor protection remains paramount. ODTE options are complex instruments that demand a strong understanding and careful risk management. They require fast decision-making and expertise, as they can result in significant gains or losses within hours or minutes.

Therefore, ODTEs are suitable primarily for experienced market participants.

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# KNOWLEDGE ARTICLES & INDUSTRY INSIGHTS



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## GIFT City: A Gateway of Financial Opportunities for NRIs

For millions of Non-Resident Indians (NRIs) who wish to participate in India's economic rise while managing wealth globally, GIFT City has emerged as a gateway of unparalleled opportunity. Situated strategically between Ahmedabad and Gandhinagar, Gujarat International Finance Tec-City—or GIFT City—is India's first operational smart city and home to the country's only International Financial Services Centre (IFSC).

In simple terms, GIFT IFSC is India's own global financial hub, enabling transactions in foreign currencies and providing access to international markets, all under a regulatory framework that matches leading centres like Singapore or Dubai. It allows NRIs to invest, manage, and grow their wealth seamlessly while staying connected to India's growth story.

### Why GIFT City Matters for NRIs

India's journey toward becoming a \$10 trillion economy is fuelled by innovation, investment, and the global Indian community. GIFT City sits at the heart of this transformation—connecting India's financial ecosystem with global investors, businesses, and NRIs.

The International Financial Services Centres Authority (IFSCA), the unified regulator of GIFT IFSC, brings together the powers of RBI, SEBI, IRDAI, and PFRDA under one roof, ensuring clarity, transparency, and ease of doing business. For NRIs, this means participating in India's capital and financial markets through a globally aligned system with simplified regulations, foreign-currency flexibility, and attractive tax incentives.

## Tax and Regulatory Edge for NRIs

The financial advantages of GIFT City IFSC are unmatched in India:

- 100% income tax exemption for IFSC units for 10 consecutive years within a 15-year block.
- No Securities Transaction Tax (STT), Commodities Transaction Tax (CTT), or stamp duty on trades executed in exchanges in GIFT IFSC.
- Exemption on interest income earned by non-residents on deposits or money lent to IFSC units.
- Capital gains exemptions for specified securities listed on GIFT exchanges.
- No GST on offshore services or goods traded within the IFSC.
- Freedom from Indian exchange control regulations, allowing smoother movement of capital.

These incentives make GIFT City not just competitive—but truly world-class—for NRIs looking to manage wealth globally while benefiting from India's policy environment.

## What Can NRIs Do Through GIFT City?

GIFT City provides multiple pathways for NRIs to engage in wealth creation, investment, and global financial management. The following table captures the key products, sectors, and benefits available to NRIs through GIFT IFSC:

Sector	Products Available	Key Benefits for NRIs
Banking	<ul style="list-style-type: none"> <li>• Foreign-currency Term Deposits / Fixed Deposits</li> <li>• Offshore Derivative Instruments (ODIs) / Participatory Notes</li> </ul>	<ul style="list-style-type: none"> <li>• Interest income exempt from Indian tax</li> <li>• No need for PAN or Income Tax Return filing</li> <li>• Higher interest rates in USD, GBP, EUR, etc.</li> <li>• Exposure to Indian securities with zero domestic compliance</li> </ul>
Funds & Investments	<ul style="list-style-type: none"> <li>• Alternative Investment Funds (Category I, II &amp; III)</li> <li>• Exchange-Traded Funds (ETFs)</li> <li>• Portfolio Management Services (PMS)</li> <li>• Family Investment Funds (FIFs)</li> </ul>	<ul style="list-style-type: none"> <li>• 100% NRI participation permitted</li> <li>• Investments in Indian and global markets</li> <li>• Capital gains tax exemption on specified securities</li> <li>• No PAN or ITR requirement</li> <li>• Top fund houses (HDFC, DSP, Mirae, Nippon) already present</li> </ul>
Capital Markets	<ul style="list-style-type: none"> <li>• Trading in foreign-currency denominated securities</li> <li>• Participation in GIFT IFSC Exchanges (India INX, NSE IFSC)</li> <li>• Global Access</li> </ul>	<ul style="list-style-type: none"> <li>• No capital gains tax for non-residents</li> <li>• Trade globally without physical presence in India</li> <li>• Multi-currency trading environment (USD, GBP, EUR, SGD, AED, etc.)</li> </ul>
Insurance	<ul style="list-style-type: none"> <li>• Life and General Insurance Products denominated in foreign currency</li> </ul>	<ul style="list-style-type: none"> <li>• Purchase insurance products from IFSC-registered insurers</li> <li>• Pay and receive in global currencies</li> <li>• 10+ major insurance firms already operational</li> </ul>
FinTech & TechFin	<ul style="list-style-type: none"> <li>• Setting up or investing in technology-driven financial solutions</li> <li>• Sandbox participation</li> </ul>	<ul style="list-style-type: none"> <li>• 100% income tax exemption for 10 years</li> <li>• Incentives for capital and operational expenditure</li> <li>• Access to Gujarat's deep technology talent base</li> </ul>
Professional Services (BATF)	<ul style="list-style-type: none"> <li>• Outsourcing of Business Accounting, Taxation, and Financial Crime Compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Tax exemption benefits for 10 out of 15 years</li> <li>• Cost-effective access to skilled Indian professionals</li> <li>• Fiscal support under Gujarat's IT/ITeS policy</li> </ul>

### **Ease, Access, and Global Reach**

What truly sets GIFT City apart for NRIs is convenience and confidence. Transactions are permitted in 15 global currencies, including USD, GBP, EUR, AED, SGD, and AUD. Funds can be freely repatriated, making it ideal for NRIs who wish to manage wealth without regulatory friction.

The presence of over 31 international and Indian banks, 200+ funds, two international exchanges, and leading global institutions gives GIFT City the depth and liquidity of a global financial centre. For NRIs living in the UAE, UK, US, Singapore, or elsewhere, it's like having an offshore investment hub—on Indian soil.

### **A Safe, Smart, and Sustainable Investment Hub**

GIFT City is not just about finance—it's about future-ready living. The city offers cutting-edge digital infrastructure, 24x7 utilities, automated waste systems, district cooling technology, and a “walk-to-work” lifestyle. With upcoming international university campuses, fintech research centres, and world-class amenities, it embodies the India of tomorrow.

For NRIs, this makes GIFT City not just an investment opportunity, but a trustworthy ecosystem—a place where global finance, innovation, and quality of life converge.

### **The NRI Advantage – Invest in India's Future**

GIFT City gives NRIs the best of both worlds—the comfort of global finance and the confidence of Indian governance. Whether it's earning higher returns through foreign-currency deposits, diversifying investments via IFSC funds, trading globally from India, or setting up your own financial venture—the possibilities are endless.

For every NRI who has ever wanted to be part of India's growth while staying globally connected, GIFT City is the perfect destination—safe, smart, and full of opportunity.





# Gift Brokers Association Inauguration Event

The inaugural edition of SAMANVAY 1.0, held on April 28, 2025, at the prestigious GIFT Club, was a landmark gathering for India's international financial services ecosystem. Organised by Jaypee Capital Services IFSC and Altus Fund Management IFSC, the event brought together an esteemed audience of regulators, policymakers, industry leaders, and global financial institutions to engage in forward-looking conversations around capital markets and fund management.

It was during this high-profile conclave that the Gift Brokers Association (GBA) was formally launched—a pivotal moment marking the establishment of a dedicated, member-driven body to represent and support trading members at GIFT IFSC. The Association's unveiling was in perfect alignment with the event's overarching theme of "Samanvay", which means "unity," and reflects the need for a cohesive voice and collaborative action in shaping the future of GIFT City.

**The GBA's launch received strong recognition and support from the attending stakeholders. With a focus on:**

- Strengthening market infrastructure
- Enhancing investor trust
- Providing operational and regulatory support

The Association was introduced as a cornerstone initiative to accelerate the maturity of GIFT IFSC's capital markets landscape.

By establishing the Gift Brokers Association at SAMANVAY 1.0, the event not only celebrated industry progress but also set the stage for strategic alignment between market participants and regulators. It signified a bold step forward in GIFT City's journey to becoming a globally integrated financial hub driven by collaboration, innovation, and inclusivity.



## Unveiling of the GBA Website by the Chief Guest



Mr. Pradeep Ramakrishnan, Executive Director, IFSCA, inaugurated the official website of the Gift Brokers Association on 26th August 2025.

## Signzy Product Demo Event



Gift Brokers Association (GBA), in collaboration with Signzy, successfully hosted an exclusive product demo of the One Touch KYC Solution on 10th September 2025 at FlexOne, GIFT IFSC.

## Session on Global Access



### Glimpse of the successful knowledge sharing session held on 29th September 2025.

The GBA hosted a successful interactive session at GIFT City focused on "Global Access Providers." Esteemed speakers from the International Financial Services Centres Authority (IFSCA), including Mr. Pradeep Ramakrishnan, Executive Director, Mr. Arjun Prasad, GM, Capital Market, IFSCA, and Mr. Amit Prajapati, DGM, Capital Market, IFSCA, shared valuable insights on the regulatory framework for Global Access Providers.



## World Investor Week 2025

World Investor Week 2025- Highlights from GBA (6th-12th October 2025)

As part of the global celebration of World Investor Week 2025, the Gift Brokers Association (GBA) actively participated in a range of awareness-building and educational events across the GIFT IFSC ecosystem.

The week-long campaign focused on financial literacy, investor protection, and informed participation in international financial markets.

Below are some memorable moments and highlights capturing GBA's contributions to this global initiative.

### Awareness Workshop with NSE IX

During World Investor Week 2025 (6th-12th October), the GBA collaborated with NSE International Exchange (NSE IX) for an insightful session titled **"Building Broker Awareness."**

This seminar reinforced GBA's commitment to enhancing broker awareness, empowering investors, and strengthening the global presence of GIFT City.

### India INX Seminar on GIFT IFSC: Gateway to Global Markets

In conjunction with World Investor Week 2025, GBA partnered with India INX and the International Financial Services Centres Authority (IFSCA) for a seminar focused on **"Gateway to Global Markets."**

The event highlighted compliance insights, regulatory updates, and India INX's role as a global platform. It underscored GBA's commitment to investor awareness and financial empowerment.

### Student Engagement Program

GBA is excited to announce its National Level Seminar scheduled for 9th October 2025 at 11:00 AM, organized in collaboration with the BK School of Professional Management Studies, Gujarat University.

The session will focus on India's growing international financial ecosystem and the opportunities within GIFT IFSC.

### Esteemed speakers include:

Dr. (Ms.) Neelam Purey – Purplesigma Services IFSC Pvt. Ltd.

Mr. Devesh Bagrodia – Zincmoney IFSC Pvt. Ltd.

Mr. Gaurav Khinvsara – Appreciate Broking IFSC Pvt. Ltd.

The seminar will be coordinated by Prof. (Dr.) Mamta Brahmbhatt from BKSPMS, Gujarat University. This initiative by GBA aims to promote awareness and bridge academia with the evolving world of global finance.





## Glomopay IFSC demo event

Gift Brokers Association, in collaboration with Glomo Payments IFSC, hosted an exclusive session on **“The Future of IPOs, Simplified at GIFT City!”**.

The event highlighted Glomo's innovative digital solutions for seamless IPO payment collections and refunds. Members and participants gained valuable insights into technology-driven efficiencies shaping the IPO ecosystem at GIFT City.



## Monthly Meetings





## Compliance Calendar For Broker Dealer

Compliance description	Due Date	India INX	NSEIX	IIBX	IFSCA
<b>QUARTERLY</b>					
Quarterly Reporting for Capital Market Intermediaries			Within 22 days from the end of every quarter		Within 15 days from the end of every quarter
Settlement of Client Funds lying with Broker Dealers		Within 25 days from the end of every quarter	Within 20 days from the end of every quarter		
<b>HALF YEARLY</b>					
Submission of Cyber Security Resilience Audit Report		Within 2 months from half year ending September and March	Within 2 months from half year ending September i.e. 30th November every year Within 3 months from half year ending March i.e. 30th June every year	Within 3 months from half year ending March i.e. 30th June every year	
Submission of System Audit Report		Within 2 months from half year ending September and March	Within 2 months from half year ending September i.e. 30th November every year Within 3 months from half year ending March i.e. 30th June every year	Within 3 months from half year ending March i.e. 30th June every year	
Submission of Internal Audit Report	Within 2 months from half year ending March and September i.e. 31st May every year and 30th November every year	✓	✓	✓	-
Submission of half yearly Net worth certificate	Within 2 months from half year ending March and September i.e. 31st May every year and 30th November every year	✓	✓	-	-
Periodic submission of System Audit Report for Vendors providing Co-Location as a Service (CaaS) facility	Within 2 months from half year ending March and September i.e. 31st May every year and 30th November every year	-	✓	-	-
Revision in Terms of Reference (TOR) for submission of system audit report & additional submission of Vulnerability Assessment and Penetration Testing (VAPT) report for Vendors	Within 3 months from half year ending March and September i.e. 30th June every year and 31st December every year	-	✓	-	-
Periodic submission of System Audit Report for Vendors providing Co-Location as a Service (CaaS) facility	Before onboarding of first member	-	✓	-	-

**Disclaimer:** While we have endeavoured to compile the above information from exchange websites, circulars, and applicable regulations, the Gift Brokers Association (GBA) does not assume responsibility for its accuracy or completeness. Members are advised to independently verify the information with the respective exchanges and should not rely solely on this data for decision-making.

## ANNUALLY

Compliance description	Due Date	India INX	NSEIX	IIBX	IFSCA
System Audit Report		-	By 30th June	By 30th June	-
Cyber Security Audit Report		-	By 30th June	By 30th June	-
Networth Certificate Submission of Yearly Net Worth Certificate (Audited)		-		Within 180 days from the end of Financial Year	-
Annual Returns (Audited Annual Accounts, Auditor's Report and networth)		On or before October 31st	On or before October 31st	Within 3 months from the end of financial year	
Annual Report of Global Access		-	Within 30 days from the end of financial year	-	-
Reporting for Artificial Intelligence (AI) and Machine Learning (ML) applications and systems	Within 15 calendar days after 31 March of every financial year	✓	✓	-	-
Annual Compliance Audit Report	By 30th September of such year	✓	✓	✓	✓
Annual confirmation by ISV	Within one month of the start of the financial year	-	✓	-	-
Periodic submission of System Audit of Application Service Provider (ASP)	On or before 30th June	-	✓	-	-

## EVENT BASED COMPLIANCES

Compliance description	Due Date	India INX	NSEIX	IIBX	IFSCA
Change in Name of the Member		Prior Approval	Prior Approval	-	Intimation to be made
Change in Capital Structure and Shareholding		Prior Approval	Prior Approval	-	Intimation to be made
Change in Registered Address			Prior Approval	-	Intimation to be made
Change in Designated Director and Ordinary Director		-	Prior Approval	-	Intimation to be made
NOC for Global Access		-	Prior Approval	-	-
Activation/Deactivation of Proprietary trading facility		-	Prior Approval	-	-
Application for Algo Trading		-	Prior Approval	-	-
Algo ID for all algo orders		-	Prior Approval	-	-
Activation of NEAT User ID		-	Prior Approval	-	-
Advertisements (Rule (5) (h) of Chapter IV of the Rules of the exchange)		-	Prior Approval	-	-
Application to register as Independent Software Vendors (ISVs)		-	Prior Approval	-	-
Registered ISV's have to apply to become CaaS vendor		-	Prior Approval	-	-
Application of colocation facility at NSEIFSC		-	Prior Approval	-	-
Application to Register as Application Service Provider (ASPs)		-	Prior Approval	-	-
Trading through Internet Based Trading (IBT) at NSE IFSC Limited		-	Prior Approval	-	-
Trading through Security Trading Through Wireless Technology (STWT) at NSE IFSC Limited		-	Prior Approval	-	-
Trading through Direct Market Access (DMA) at NSE IFSC Limited		-	Prior Approval	-	
Appointment and Change of Principal Officer and Compliance Officer		Intimation to be made	Intimation to be made	-	Intimation to be made
Upload of Unique Client Information (UCI)			Intimation to be made	-	
Change in MOA/AOA		Intimation to be made	-	-	Intimation to be made



# Major Announcements by IFSCA

3 April 2025	Direction for all Regulated Entities	IFSCA-LPRA/9/2024-Legal and Regulatory Affairs	<a href="https://ifsc.gov.in/CommonDirect/GetFileView?id=d09c93fc98191af1801a5914f31896f1&amp;fileName=circular-on-holding-valid-and-subsisting-loa-and-cor03042025080912.pdf&amp;TitleName=Legal">https://ifsc.gov.in/CommonDirect/GetFileView?id=d09c93fc98191af1801a5914f31896f1&amp;fileName=circular-on-holding-valid-and-subsisting-loa-and-cor03042025080912.pdf&amp;TitleName=Legal</a>
8 April 2025	Fee structure for the entities undertaking or intending to undertake permissible activities in IFSC or seeking guidance under the Informal Guidance Scheme	IFSCA-DTFA/1/2025	<a href="https://ifsc.gov.in/CommonDirect/GetFileView?id=d09c93fc98191af1801a5914f318bf64&amp;fileName=ifsc-fee-circular-08apr202508042025073502.pdf&amp;TitleName=Legal">https://ifsc.gov.in/CommonDirect/GetFileView?id=d09c93fc98191af1801a5914f318bf64&amp;fileName=ifsc-fee-circular-08apr202508042025073502.pdf&amp;TitleName=Legal</a>
11 April 2025	IFSCA (Capital Market Intermediaries) Regulations, 2025	F. No. IFSCA/GN/2025/003	International Financial Services Centres Authority
23 April 2025	Clarifications on the Fee structure for the entities undertaking or intending to undertake permissible activities in IFSC or seeking guidance under the Informal Guidance Scheme	IFSCA-DTFA/2/2025	<a href="https://ifsc.gov.in/CommonDirect/GetFileView?id=d09c93fc98191af1801a5914f3191bae&amp;fileName=clarification-on-the-fee-circular_23apr2025-1-23042025053448.pdf&amp;TitleName=Legal">https://ifsc.gov.in/CommonDirect/GetFileView?id=d09c93fc98191af1801a5914f3191bae&amp;fileName=clarification-on-the-fee-circular_23apr2025-1-23042025053448.pdf&amp;TitleName=Legal</a>
5 June 2025	Modifications under IFSCA (AML/CFT & KYC) Guidelines, 2022	F. No. IFSCA-DAC/7/2024-AMLCFT/01	International Financial Services Centres Authority
12 August 2025	Regulatory Framework for Global Access in the IFSC	IFSCA-PLNP/80/2024-Capital Markets	International Financial Services Centres Authority
4 September 2025	IFSCA (CMI) regulations, 2025 - Extension of deadline for implementing revised norms for principal officer and compliance officer for capital market intermediaries	IFSCA-PLNP/80/2024	International Financial Services Centres Authority
12 September 2025	IFSCA (CMI) Regulations, 2025 - Extension of deadline for compliance with revised net worth requirements	No. IFSCA-PLNP/80/2024	International Financial Services Centres Authority
31 October 2025	Modifications under the International Financial Services Centres Authority (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022.	No. IFSCA-PLNP/80/2024	International Financial Services Centres Authority
3 November 2025	Consultation Paper on amendments to the IFSCA (Capital Market Intermediaries) Regulations, 2025	-	International Financial Services Centres Authority

# Your Path to GBA Membership

Trading, Clearing or Professional Clearing Member of NSE IX, India INX, IIBX, or any GIFT City based exchange.

## Membership Categories

### A

#### Executive Member (with voting rights)

IFSCA-licensed entities with active presence in GIFT City. representative) and be in good standing with no pending regulatory or disciplinary actions.

### B

#### Associate Member (Non-voting)

Individuals or entities maintaining ongoing relationships with the broking or capital markets industry.  
**Significant Stakeholders:** Individuals or entities maintaining ongoing relationships with the broking or capital markets industry.

**Service Providers:** Legal, compliance, technology, consultancy, or other professional firms engaged in supporting the IFSC ecosystem.

**International Exchanges or Other Institutions:** Global or regional market infrastructure institutions collaborating with the IFSC community.

**Honorary Members:** Non-voting members recognized for their special contribution to the development of the IFSC ecosystem.

## Membership Fees (for the 1st Year: July – March 2026)

Category	Membership Fee (₹)
Executive Member	15,000/-

(Membership fees are subject to review and approval by the Governing Board.)

Category	Membership Fee (₹)
• Significant Stakeholder	25,000/-
• Service Provider	20,000/-
• International Exchange / Other Institution	25,000/-

### Application Process

#### Prospective members are required to:

1. Submit the **Membership Application Form** available on our website at [www.giftbrokers.in](http://www.giftbrokers.in), along with the **Declaration of Authorized Person**.
2. Attach relevant supporting documents as specified in the form.
3. Email the complete application package to **info@giftbrokers.in** for review and approval by the GBA Board.

**For any assistance, please contact us at +91 79800 14635 or [info@giftbrokers.in](mailto:info@giftbrokers.in)**

# With Gratitude to Our Sponsors

The Gift Brokers Association (GBA) extends its sincere appreciation to all our partners and sponsors whose generous support has enabled the successful publication of this Bi-Yearly Magazine. Your continued trust and collaboration play a vital role in strengthening the GIFT IFSC ecosystem and empowering industry-wide thought leadership.

## Exchange Sponsor



## Broker Dealer Sponsors



## Technology Solutions Providers



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## Supported By





**The Gift Brokers Association (GBA)** is the collective voice of trading and clearing members within GIFT IFSC.

We work to strengthen the broking ecosystem through collaboration, advocacy, and knowledge sharing, helping shape GIFT City into a globally competitive financial hub.

**The Voice of GIFT City's Broking Community**

**Advocacy | Collaboration | Growth | Global Standards**



**Gift Brokers Association (GBA)**

[www.giftbrokers.in](http://www.giftbrokers.in) | Email: [Info@giftbrokers.in](mailto:Info@giftbrokers.in)