



INTERNATIONAL FINANCIAL SERVICES CENTRES AUTHORITY (IFSCA)

ORDER

Order under Section 13(4) of the International Financial Services Centres Authority Act, 2019 [hereinafter referred to as "IFSCA Act, 2019"] read with Section 11B(1) and 11B(2) of the Securities and Exchange Board of India Act, 1992 read with Regulation 68(1) the International Financial Services Centres Authority (Capital Market Intermediaries) Regulations, 2021 [hereinafter referred to as "IFSCA (CMI) Regulations, 2021"] read with Regulation 41(1) and 47(3) of the International Financial Services Centres Authority (Capital Market Intermediaries) Regulations, 2025 [hereinafter referred to as "IFSCA (CMI) Regulations, 2025"]

In Respect of:

Gateway Financial Services (IFSC) Private Limited
INZ000098632

A. BACKGROUND

1. The Gateway Financial Services (IFSC) Private Limited (hereinafter referred to as "Noticee") is registered as a Broker Dealer, bearing registration number INZ000098632.
2. The International Financial Services Centres Authority (hereinafter referred to as "IFSCA/Authority") notified the IFSCA (CMI) Regulations, 2021, wherein a registered capital market intermediary (CMI) is required to furnish such reports, returns, statements and particulars, in such manner, interval and form, as may be specified by the Authority from time to time. The Authority has also issued the IFSCA (CMI) Regulations, 2025, wherein the requirement pertaining to submission of quarterly reports has been prescribed again.
3. The Authority has, through Circular F.No.1/IFSCA/CMI Supervision/2023-24 dated February 8, 2024, (hereinafter referred to as Circular dated February 8, 2024) has mandated CMIs to submit quarterly reports in the format prescribed by the Authority within 15 (fifteen) days of the end of the quarter. The Noticee being a registered CMI was under an obligation to submit the quarterly reports within the time stipulated above.

The Noticee had failed to submit the reports for the quarter ending Jan-Mar 2024, April-June 2024, July-September 2024, and October-December 2024 in time. The Authority

INTERNATIONAL FINANCIAL SERVICES CENTRES AUTHORITY

Second & Third Floor, PRAGYA Tower, Block 15, Zone 1, Road 1C, GIFT SEZ, GIFT City,
Gandhinagar-382 355, Gujarat, India. P: +91 79 6180 9800



Handwritten signature and initials in blue ink.

issued a letter dated February 7, 2025, to the National Stock Exchange-International Exchange (NSE-IX), directing it to issue warning letter to the Noticee. Accordingly, the NSE-IX, through letter bearing Ref no. NSEIFSC/REG/2025/142082 dated February 10, 2025, warned the Noticee to ensure due compliance with all the applicable rules/regulations/ guidelines/circulars etc. which include the reporting requirements as prescribed thereunder.

5. Further, based on the facts mentioned above, the Competent Authority approved initiation of action against the Noticee for non-compliance with the IFSCA (CMI) Regulations.
6. The Noticee had submitted the Quarterly reports for the aforementioned quarters vide email dated May 11, 2025.

B. SHOW CAUSE NOTICE AND REPLY

7. A Show Cause Notice (hereinafter referred to "SCN") dated January 6, 2026, was issued to the Noticee via e-mail dated January 6, 2026, and by Speed Post Acknowledgement Due requiring the Noticee to show cause, as to why appropriate actions under Section 13(4) of the IFSCA Act, 2019 read with Sections 11B(1), 11B(2), 12(3), 15A(b) and 15HB of the Securities and Exchange Board of India, 1992 read with Regulation 68(1) the IFSCA (CMI) Regulations, 2021 read with Regulation 41(1) of the IFSCA (CMI) Regulations, 2025", should not be initiated for the alleged violations committed. The charges against the Noticee as mentioned under the SCN was:

- i. **Charge 1:** That the Noticee has failed to submit the reports for the quarter ending Jan-Mar 2024, April-June 2024, July-September 2024, and October-December 2024, within the time stipulated under the Circular dated February 8, 2024, issued under the IFSCA (CMI) Regulations, 2021.
- ii. **Charge 2:** That the Noticee has submitted the quarterly reports without payment of the late fee as provided under the IFSCA Fee Circular F.No.865/IFSCA/Banking/Fee Revision/2022-23 dated May 17, 2023, read with Circular IFSCA-DTFA/1/2025 dated April 8, 2025 (as amended from time to time) (hereinafter referred to as "Fee Circular").

8. The Noticee submitted its response vide email dated January 19, 2026. The response of the Noticee pertaining to the charge is mentioned in brief below:



- i. Response to Charge 1: The Noticee acknowledged that the quarterly reports were not submitted within the stipulated timeline of 15 days from the end of the respective quarters. The Noticee had submitted that the delay was purely due to administrative oversight and internal procedural lapses, without any intention to contravene the applicable regulations. The Noticee also submitted that robust internal compliance mechanisms have now been put in place to ensure timely submission of all future reports.
- ii. Response to Charge 2: The Noticee submitted that it is willing to remit the applicable late submission fees. However, the Noticee submitted that they are unable to determine the exact amount of late submission fee payable. Accordingly, the Noticee had requested the exact amount to be remitted, be shared with it.

C. PERSONAL HEARING

9. After consideration of the response to the SCN submitted by the Noticee, a personal hearing was scheduled before the Quasi-Judicial Authority for Enforcement constituted for the matter, on February 23, 2026. A Hearing Notice was sent to the Noticee via email dated February 09, 2026.

10. The Hearing was conducted as scheduled. The following representative attended on behalf of the Noticee:

- i. Mr. Pratik Agarwal, Director and Authorized Representative of the Noticee

11. During the hearing, the charges/allegations were presented and the authorized representative made charge-wise submissions, inter alia, as below:

- i. The authorized representative reiterated the contents of the written submissions made in their reply submitted vide email dated January 19, 2026.
- ii. The authorized representative stated that they will pay the pending dues as required under the Authority's Fee Circular, as amended from time to time.

D. OBSERVATIONS AND FINDINGS

12. Before proceeding further, the Quasi-Judicial Authority for Enforcement deems it fit to refer to the relevant provisions applicable to the matter. The relevant provisions are reproduced below:

- i. Regulation 15(2) of the IFSCA (TCMI) Regulations, 2021 states that:

TC



"A registered capital market intermediary shall furnish such reports, returns, statements and particulars, in such manner, interval and form, as may be specified by the Authority from time to time".

- ii. Regulation 17(3) of the IFSCA (CMI) Regulations, 2025 states that:

"A registered capital market intermediary shall furnish such reports, returns, statements and particulars, in such manner, interval and form, as may be specified by the Authority from time to time".

13. The Quasi-Judicial Authority for Enforcement has gone through the allegations laid out in the SCN dated January 6, 2026.

14. The Quasi-Judicial Authority for Enforcement have also gone through the response submitted by the Noticee vide email dated January 19, 2026, and reiterated at the personal hearing on February 23, 2026.

15. The Quasi-Judicial Authority for Enforcement is of the view that the submission of quarterly report is a regulatory requirement and administrative oversight and procedural lapse on the part of the Noticee does not justify the delay in filing of the quarterly reports. The Noticee is under an obligation to comply with the applicable regulations at all times. Furthermore, the Noticee has not paid the late fee specified in the Authority's Fee Circular.

16. The Quasi-Judicial Authority for Enforcement is of the view that the Noticee has violated Regulation 15(2) of the IFSCA (CMI) Regulations, 2021 and Regulation 17(3) of the IFSCA (CMI) Regulations, 2025. However, the Quasi-Judicial Authority for Enforcement notes the fact that the Noticee had submitted the reports even before the SCN was issued. Accordingly, the Quasi-Judicial Authority for Enforcement finds it fit to issue direction to the Noticee to pay the applicable late submission fees in terms of the said Fee Circular.

E. ORDER

17. In view of the aforesaid findings and having regard to the facts and circumstances, the Quasi-Judicial Authority for Enforcement by virtue of exercising the powers given to it under Section 13(4) of the IFSCA Act, 2019 read with Section 11B(1) of the SEBI Act, 1992 read with Regulation 68(1) the IFSCA (CMI) Regulations, 2021 read with Regulation 41(1) and 47(3) of the IFSCA (CMI) Regulations, 2025 hereby directs the Noticee to pay the applicable late fee on delayed submission of quarterly reports as



required under the Circular F.No.865/IFSCA/Banking/Fee Revision/2022-23 dated May 17, 2023 read with Circular IFSCA-DTFA/1/2025 dated April 8, 2025, **within 45 days from the date of receipt of this order**. In case the Noticee fails to pay the applicable late fee during the aforesaid period, stringent action will be taken against the Noticee.

18. The proceeding initiated vide Show Cause Notice dated January 6, 2026, is disposed of in above terms.

19. The Order comes into force with immediate effect.

20. A copy of this order shall be served upon the Noticee.



Gyan Chand Jain
Member, QJAE



Supriyo Bhattacharjee
Member, QJAE



K Mahipal Reddy
Member, QJAE

Place: Gandhinagar, Gujarat

Date: 04-05-2026

