



INTERNATIONAL FINANCIAL SERVICES CENTRES AUTHORITY (IFSCA)

ORDER

Order under Section 12 and 13(4) of the International Financial Services Centres Authority Act, 2019 read with Section 12(3), 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 read with Regulation 47(3) of the International Financial Services Centres Authority (Capital Market Intermediaries) Regulations, 2025

In respect of:

Silver Stream Equities (IFSC) Private Limited
INZ000097931

A. BACKGROUND

1. Silver Stream Equities (IFSC) Private Limited (hereinafter refer to as "SSEPL/Noticee) is registered as a stockbroker with registration number INZ000097931 dated January 14, 2017. The Noticee has been inactive for more than 8 years on the Stock Exchange.
2. The International Financial Services Centres Authority (IFSCA) has issued Circular F. No. 1/IFSCA/CMI Supervision/2023-24 dated February 08, 2024 (hereinafter referred to as Quarterly Report Circular) requiring all Capital Market Intermediaries (CMIs) in IFSC to submit quarterly reports in the formats prescribed by the Authority within 15 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.
3. The IFSCA had issued a letter dated February 07, 2025, to the National Stock Exchange International Exchange (NSE-IX), directing it to issue warning letter to the Noticee in respect of non-submission of quarterly reports. However, even after issuance of the warning letter dated February 10, 2025 by NSE-IX, the Noticee has not submitted the Quarterly reports as stipulated in the Quarterly Report Circular.

INTERNATIONAL FINANCIAL SERVICES CENTRES AUTHORITY

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4. On the basis of the aforesaid, it is alleged that the Noticee has violated Quarterly Report Circular read with Regulation 15(2) of the International Financial Services Centres Authority (Capital Market Intermediaries) Regulations, 2021 (CMI Regulations, 2021) read with corresponding provisions of Regulations 17(3) and 47(3) of the International Financial Services Centres Authority (Capital Market Intermediaries) Regulations, 2025 (CMI Regulations, 2025).

B. SHOW CAUSE NOTICE, REPLY AND OPPORTUNITY OF PERSONAL HEARING

1. On the basis of the aforesaid observations, a Show Cause Notice (hereinafter referred to "SCN") dated January 16, 2026 was issued to the Noticee to show cause as to why action under Section 12 and 13(4) of the International Financial Services Centres Authority Act, 2019 (IFSCA Act, 2019), read with Section 12(3), 11B(1) and 11B(2) (read with section 15A(a) and 15HB), read with Regulation 68(1) of the CMI Regulations, 2021 read with Regulation 47(3) of the CMI Regulations, 2025 should not be taken against it. The documents relied upon in the said SCN were also supplied alongwith the said SCN.
2. The Noticee filed its reply on March 6, 2026. Further, an opportunity of personal hearing was provided to the Noticee before the Quasi-Judicial Authority for Enforcement (hereinafter referred to QJAE) on March 9, 2026, wherein Ms. Vidhi Hakani appeared as authorised representative on behalf of the Noticee through video conference.
3. In the aforesaid hearing, the authorized representatives of the Noticee made submissions *inter alia* in line with the reply dated March 6, 2026. Further, the Noticee also filed additional reply vide e-dated March 11, 2026.

C. CONSIDERATION AND FINDINGS

4. The QJAE has perused the SCN and submissions of the Noticee No. 2 to each allegation mentioned in the SCN. The SCN alleges that the Noticee has not submitted the Quarterly Reports as per the requirements of Quarterly Report Circular.

Reply of the Noticee to the Allegation

5. In respect of the allegation mentioned in the SCN, the Noticee has *inter alia* submitted as under:
 - (i) The Noticee was not an active member and it had received communication from the exchange that during the period of it being inactive, submission of reports was not required. Based on this communication from the exchange, the Noticee believed that the reporting

obligations were not applicable to it. In this regard, the Noticee has enclosed some communications sent to/received from exchanges.

- (ii) The Noticee has denied receipt of letter dated February 9, 2025 from NSE-IX and has also submitted that it was not aware of the Quarterly Report Circular.
- (iii) The Noticee was not carrying out active business operations, has not generated revenue and is incurring losses. The lapses were procedural in nature and has not resulted in any regulatory prejudice, investor impact or financial loss to IFSCA.
- (iv) The Noticee has submitted the quarterly reports to the IFSCA.

Observation of QJAE

6. The Noticee has claimed that it is inactive and had received communications from the exchange that during period of it being inactive, submission of reports was not required. The e-mails produced by the Noticee has been perused and it is found that such communication was sent to the Noticee when it applied for surrender of its registration in 2021. However, the QJAE observes that the said surrender request of the Noticee was not processed and therefore, the Noticee was still under obligation to comply with the regulatory requirements. Without prejudice to the same, the QJAE has considered the submission of the Noticee that it has submitted all the quarterly reports till Q 3 2025-26, and, therefore, on that account no further adverse inference can be drawn.
7. Since the Noticee has submitted the quarterly reports belatedly, the Noticee is also liable to pay late submission fees for delayed submission of report in terms of Circular F.No.865/IFSCA/Banking/Fee Revision/2022-23 dated May 17, 2023 read with Circular IFSCA-DRFA/1/2025 dated April 8, 2025 (hereinafter referred to as Late Fees Circular). The said obligation still remains unfulfilled and requires to be fulfilled by the Noticee.

D. ANALYSIS OF FINDINGS AND PROPORTIONATE ACTION

8. On the basis of the facts and circumstances as discussed above, it is concluded that the Noticee had failed to comply with Circular F. No. 1/IFSCA/CMI Supervision/2023-24 dated February 08, 2024. However, the Noticee, upon initiating the proceedings in the SCN, has complied with the said submission requirement. Further, the Noticee has been inactive for almost 8 years and has not carried out any activity.

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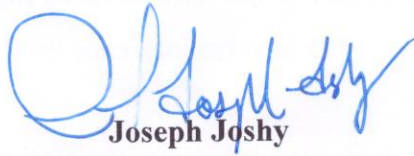
9. Considering all the aforesaid factors particularly the fact that the Noticee is liable to pay late submission fees in terms of Late Fees Circular, the QJAE finds it fit to issue direction to the Noticee to pay the applicable late submission fees in terms of the said Circular.

E. ORDER

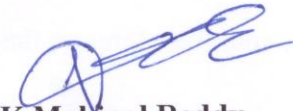
10. In view of the aforesaid findings and having regard to the facts and circumstances of the case, the QJAE, in exercise of the powers conferred under Section 12 and 13(4) of the IFSCA Act, 2019 read with Section 11B(1) of the SEBI Act, 1992 read with Regulation 68(1) the CMI Regulations, 2021 read with Regulation 47(3) of the CMI Regulations, 2025, directs the Noticee to pay the applicable late fee on delayed submission of quarterly reports, in terms of Circular F.No.865/IFSCA/Banking/Fee Revision/2022-23 dated May 17, 2023 read with Circular IFSCA-DRFA/1/2025 dated April 8, 2025.
11. This order shall come into force with immediate effect.



Gyan Chand Jain
Member
QJAE



Joseph Joshy
Member
QJAE



K Mahipal Reddy
Member
QJAE

Place: Gandhinagar



Date: 24 - 03 - 2026