

BEFORE THE APPELLATE AUTHORITY
(Under the Right to Information Act, 2005)
SECURITIES AND EXCHANGE BOARD OF INDIA

Appeal No.6665 of 2026

Mrudula Pardeshi : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated November 21, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated December 19, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/00334) dated December 19, 2025. I have carefully considered the application, the response and the appeal and find that the matter can be decided based on the material available on record.
2. **Queries in the application** - The appellant, in his application dated November 21, 2025, sought the following information:

“ 1. All documents, circulars, manuals, or internal guidelines maintained by SEBI regarding the vendor empanelment process of the National Stock Exchange (NSE) for IT companies/ Solutions providers e.g TCS, Infosys for the Data Warehousing Team during the years 2022-2025. If there is no change in the policy over the years, please provide only the latest copy.

2. All documents, circulars, or policies regarding the NSE Vendor Code of Conduct that the above mentioned vendor companies are required to acknowledge/ sign.

3. Vendor Empanelment Process at NSE for the Data Warehousing team headed by Arun Dhall : Required documents for onboarding.

4. Vendor Code of Conduct Process at NSE for the Data Warehousing team headed by Arun Dhall

5. Official copy that every NSE vendor must sign Process at NSE for the Data Warehousing team headed by Arun Dhall

6. *Ethics, confidentiality, labour law compliance etc. clauses at NSE for the Data Warehousing team headed by Arun Dhall*

7. *Obligations regarding data handling, performance, and penalties Process at NSE for the Data Warehousing team headed by Arun Dhall”*

3. **Reply of the Respondent** – The respondent, in response to the application, informed that the information sought is not maintained by SEBI in normal course of regulation of securities market. Hence, the same is not available with SEBI.

4. **Ground of appeal** – The appellant has not mentioned any specific ground for filing the appeal.

5. I have perused the application and the response provided thereto. I note that the respondent has categorically stated that the requested information is not available with SEBI. I note that the respondent can only provide information that is available in the records. In this context, I note that the Hon’ble Supreme Court of India in *Central Board of Secondary Education & Anr. vs. Aditya Bandopadhyay & Ors* (Judgment dated August 9, 2011) held that *“The RTI Act provides access to all information that is available and existing. This is clear from a combined reading of section 3 and the definitions of ‘information’ and ‘right to information’ under clauses (f) and (j) of section 2 of the Act. If a public authority has any information in the form of data or analysed data, or abstracts, or statistics, an applicant may access such information, subject to the exemptions in section 8 of the Act. But where the information sought is not a part of the record of a public authority, and where such information is not required to be maintained under any law or the rules or regulations of the public authority, the Act does not cast an obligation upon the public authority, to collect or collate such non-available information and then furnish it to an applicant.”* Further, I note that the Hon’ble Central Information Commission in the matter of *Sh. Pattipati Rama Murthy vs. CPIO, SEBI* (Decision dated July 8, 2013), held: *“... if it (SEBI) does not have any such information in its possession, the CPIO cannot obviously invent one for the benefit of the Appellant. There is simply no information to be given.”* Accordingly, I do not find any deficiency in the response of the respondent.

6. In view of the above observations, I find that there is no need to interfere with the decision of the respondent. The appeal is accordingly dismissed.

Place: Mumbai

Date: January 14, 2026

RUCHI CHOJER

APPELLATE AUTHORITY UNDER THE RTI ACT
SECURITIES AND EXCHANGE BOARD OF INDIA