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

Appeal No. 6904 of 2026

M Anantharam : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated March 23, 2026 received by SEBI through RTI MIS portal) under the Right to Information Act, 2005 ("RTI Act"). The respondent, by a letter dated April 16, 2026 responded to the application filed by the appellant. The appellant filed an appeal dated May 27, 2026 (Reg. No. SEBIH/A/E/26/00198).

2. I note that under Section 19(1) of the RTI Act, an aggrieved person may prefer the first appeal within thirty days from the receipt of the response from the CPIO of the concerned public authority. In the instant case, the impugned response from the respondent is dated April 16, 2026. The appellant, therefore, should have filed the first appeal on or before expiry of thirty days from the date of receipt of the said response. As noted above, the appellant's first appeal was received on May 27, 2026. The first appeal has been made after the last date permissible under the RTI Act. The appellant made a request for condoning the said delay in his appeal. The appellant, in his appeal, has submitted that the SCORES workflow history enclosed by the respondent in the reply required careful examination. The appellant also submitted that the delay was not deliberate. Considering the submissions made in the appeal, the delay is condoned. Thus, I am considering the appeal on merit. I have perused the application and the appeal and find that the matter can be decided based on the material available on record.

3. **Queries in the application** - The appellant, in his application dated March 23, 2026 sought the following information:

"1. Certified copy of the complete file maintained by SEBI relating to SCORES Complaint No SEBIE/TN25/KANC/053207/1 filed on 26 December 2025.

2. Certified copies of all internal note sheets, file noting's, examination notes or comments recorded by SEBI officers in relation to the above complaint.

3. Certified copy of the Action Taken Report or response submitted by ICICI Bank to SEBI through the SCORES system regarding the above complaint.

4. Certified copies of any correspondence, communication, advisory or notice issued by SEBI to ICICI Bank in relation to the above complaint.

5. Certified copy of the internal workflow record or electronic tracking record showing the movement or assignment of the complaint within SEBI departments or divisions.

6. Certified copy of the record indicating the department or division within SEBI to which the complaint was assigned for review after the complainant submitted disagreement with the entity response on the SCORES portal.

7. Certified copies of any internal examination or review conducted by SEBI officers regarding whether the issues raised in the complaint fall within the regulatory framework of the SEBI Act, 1992 or the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

8. Certified copy of any closure note, decision note, recommendation or final order recorded by SEBI in relation to the complaint, if such a record exists.

9. Certified copy of the current status note or record showing the stage at which the complaint presently stands within the SCORES grievance redressal process.

10. Name, designation and office of the SEBI officer or division presently responsible for handling or supervising the complaint within SEBI.

11. Certified copy of any circular, standard operating procedure or internal guideline followed by SEBI for processing complaints received through the SCORES system.

12. Certified copy of any internal examination note, review memorandum, or analysis prepared by SEBI officers regarding whether the issues raised in SCORES Complaint No SEBIE/TN25/KANC/053207/1 involve governance, disclosure, or compliance obligations under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

13. Certified copy of any internal recommendation, direction, or supervisory communication issued by SEBI officers to the concerned listed entity in relation to the complaint, including any request for clarification, additional information, or compliance verification.

14. Certified copy of any internal policy document, guideline, or instruction governing the procedure followed by SEBI officers when a complainant disagrees with an entity's Action Taken Report on the SCORES platform.

15. Certified copy of any internal note, record, classification entry, or decision memorandum maintained by SEBI indicating whether SCORES Complaint No SEBIE/TN25 /KANC/ 053207 /1 was internally categorized or treated as falling outside SEBI jurisdiction or outside the regulatory scope of the SEBI Act 1992 or the SEBI Listing Obligations and Disclosure Requirements Regulations 2015."

4. **Reply of the Respondent** – The respondent, in response to query nos. 1-9, 12 & 13, informed that there is no physical file maintained at SEBI with respect to the SCORES complaints. The respondent also informed that SCORES platform is an online platform seeking redressal of investor grievances. Notwithstanding the aforesaid, respondent informed that the SCORES Complaint (Reg. No. SEBIE/TN25/KANC/053207/1) and its each detail including the response provided is available and visible to the complainant. The respondent also informed that the complaint history can be viewed by logging in to SCORES portal.

   With regard to query no.10, the respondent informed that the names of SEBI officers who handled the complaint is already available and visible to the complainant once he logs into the SCORES platform.

   With regard to query no. 11, the respondent informed that appellant can refer to SEBI Master Circular SEBI/HO/OIAE_IAD3/CIR/CIR/2023/195 dated July 31, 2023 available on SEBI website. Notwithstanding the aforesaid, the respondent informed that for the certified copy of Orders and Circulars, appellant can refer to SEBI Circular dated April 04, 2019, on "Issue of Certified copies of Orders and Circulars" available on SEBI website.

   With regard to query no. 14, the respondent informed that the requested information is available on SEBI website under the FAQs on "Investor Grievances-SCORES".

5. **Ground of appeal** – The appellant has filed the appeal on the ground that he was provided incomplete, misleading or false information.

6. I have perused the application and the response provided thereto. With regard to query nos. 1-9, 10, 12 & 13, the respondent has clearly informed that there is no physical file maintained at SEBI with respect to

SCORES complaint. The respondent has also informed that all the details pertaining to appellant's SCORES complaint can be accessed by logging into SCORES portal. Accordingly, I do not find any deficiency in the response of the respondent.

7. Regarding query no. 15, I note that the respondent has not provided any specific reply. However, I note that the response to query no. 15 is also covered in the responses to queries no. 1–9, 10, 12, and 13 in the application. Accordingly, I find that no further interference by this forum is warranted.

8. With regard to query nos. 11 and 14, I find that the requested information is available on SEBI website and hence is in public domain. In this context, I note that the Hon'ble Delhi High Court in *Registrar of Companies & ors. Vs. Dharmendra Kumar Garg & anr.* and the Hon'ble Central Information Commission in *Shri K Lall vs. Shri M K Bagri* (CIC/AT/A/2007/00112, order dated April 12, 2007) held that if the relevant information is available in the public domain, the same cannot be said to be information held by the public authority and consequently, there is no obligation to provide such information to an applicant under the RTI Act. Accordingly, I do not find any deficiency in the said response of the respondent.

9. 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: June 24, 2026

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