

## **SURVEILLANCE POLICY**

As per the requirement of Regulators Ms Amanjot Kaur – Compliance Officer is in- charge of surveillance related all activities.

He shall check the surveillance alerts from the Stock Exchange ENIT system i.e. <https://www.connect2nse.com/MemberPortal/> on daily basis. & type of alerts downloads by exchange.

The process of Due Diligence & scrutinizing each alert (client-wise/ scrip-wise separately) should be carried out & completed within fifteen days.

He shall call for the following documents of each Client, Scrutinize all documents for necessary analyses and prepare conclusion against each alert.

- a) Financial details of the client
- b) Past Trading pattern of the clients/ client group
- c) Bank / Demat transaction details (The period for such statements may be at least +/- 15 days from the date of transactions)
- d) Other connected clients in TM's UCC (common email/ mobile number/ address, other linkages, etc.)
- e) Other publicly available information

After reasonable analyses, he will report the conclusion against each alert to Designated Director. The same shall be reported to the Exchange within reasonable time.

After due discussion, the necessary actions shall be taken under instructions from Designated Director, if required.

In case of any suspicious / manipulative undue activities of any Client, the same will be reported to the Exchange immediately.

Proper records of each alert and documents scrutinized should be maintained.

A quarterly MIS shall be put up to the Proprietor on the number of alerts pending at the beginning of the quarter, generated during the quarter, disposed off during the quarter and pending at end of the quarter. Reasons for pendency shall be discussed and appropriate action taken. Also, the Board shall be apprised of any exception noticed during the disposition of alerts.