

Surveillance Policy

We have device Surveillance policy of the company and which has been approved by our Board and we have also device a reporting system from time to time. Various alerts generated as per the transactional alerts provided by the exchange. Over and above we have our own system of monitoring the transactions and carrying out the surveillance.

1. Significant increase in the client activity: We continuously monitor the trading activity of the client and keep a watch and if any client trading activity increases significantly by 30%, we report to the highest authority.
2. Sudden trading activity in Dormant Account: We do not permit trading in dormant account. The client is required to carry out to personal verification and submit the documentary proof in relating to KYC.
3. Clients/ Group of Clients dealing in common script: We keep a watch in client trading activity and explanation is asked from the client in case more than 200 clients have traded in the same script. Similarly we seek the client written explanation in case of illiquid scripts and also keep a watch on the trading quantity of each and every client.
4. Circular Trading: We do not permit circular trading at all and if any group of client indulges in circular trading, we immediately stop the trading of that client in all scripts.
5. We do not have any corporate listed companies any clients associated with such companies, so the occurrence of Pump And Dump does not arise.
6. We keep a watch on trading activity of the client and if any client is found putting the buy order at a higher price than prevailing price and similarly placing the \sale order lesser than the prevailing price.
7. In derivative segment we keep a watch on the position of the clients and ensure that the concentrated position is not permitted.
8. We do not allow clients to place an order far from the present price.
9. We continuously carried out the due diligence of the client and verify the group/association among the client to identify multiple accounts, common accounts and group of clients and also verify their trading activity if we find concentrated in few scripts, we seek explanation in writing from the client.
10. We continuously ask for documentary evidence such as bank statement, demat statement in order to establish pay in and pay out routed through the designated account. However we have inbuilt alerts in our back office itself which does not permit the transaction other than designated DEMAT/Bank account.
11. Any adverse observation made on such records we have a system of reporting to the exchange. WE also examine whether client is trading within his known income source and net worth.
12. Such alerts are reported to the management and we keep a record of its disposition.

13. We do not allow any suspicious manipulating activity and if we find any client indulging in such kind of activity, we immediately to the trading activity of such client and report to the management and FIU and the exchange.

This policy has been approved by the board and a monthly report on different alerts is placed before the board and keeps a record of management instructions on such records.

The surveillance process is under direct supervision of designated director for all Compliance activity carried out by us and the surveillance officer maintains the required records.

Our internal auditor has reviewed our surveillance policy and all other policy from time to time and has also directed to carry out required modification in the policy and the process followed by us. We conformed that we have downloaded the alerts from the exchange in a required format.

We also verify from the list of our clients any adverse reporting from any known sources from publicly available information from time to time all the debarred entities by the SEBI and action taken report by RBI and the list of defaulters kept by RBI is verified before opening any client account and if any clients name appears in such list the trading activity of such clients is immediately stopped.