

SHREE TISAI SECURITIES PRIVATE LIMITED

POLICIES AND PROCEDURES SURVEILLANCE ALERT POLICY FOR STOCK BROKING AND DEPOSITORY PARTICIPANT OPERATIONS

1. Applicability:

The Surveillance is adopted by SHREE TISAI SECURITIES PRIVATE LIMITED (herein after referred to as “Company”) and is framed in accordance with the provisions of SEBI, Exchanges and Depositories circular related to Surveillance Obligations for capital marker intermediaries like Trading Member and Depository Participants.

The policy shall be implemented by Trading Member with effect from August 05, 2022.

2. Background:

2.1. The Stock Exchanges and Depositories are providing alerts based on predefined criteria to the all the Trading Members/ Depository Participants. These alerts are required to be reviewed and appropriate actions is required to be taken after carrying out due diligence. Based on the due diligence, the alerts may be closed either by disposing-off with appropriate reasons/findings recorded or by filing Suspicious Transaction Report (STR) with FIU-India.

2.2. In addition to the alerts received from the Stock Exchanges/ Depository Participants, every Stock Broker/ Intermediaries should generate their own alerts based on various pre-defined criteria.

2.3. The Stock Exchanges/ Depository Participant shall prescribe the nature of transactions or criteria from time to time based on which additional alerts are required to be captured by the Exchange Surveillance Alerts.

3. Indicative list of Alerts:

For Stock Broking Operations:

- a) Trading activity in a single day by one client or group of clients who have contributed more than 25% in a single scrip or a single derivative contract.

- b) A client or a group of clients who are either new client/ clients or who have reactivated their trading account after significant time gap and who have contributed more than 50% of the total trading volume of a single scrip or derivative contract in a single day.
- c) Client or a group of clients dealing frequently in small quantities in a scrip.
- d) Trading activity of a client found to be disproportionate considering a reported income range details or networth.
- e) A client who has submitted modification request for changes in his/her/its demographic details of address, email id, mobile number, bank details etc. at least twice in a month.
- f) A client or a group of clients who have been found to have direct or indirect connection with a listed company and who have executed any transactions prior to any dissemination of any price sensitive information by such listed company.
- g) A client or group of clients having more than 20% volume of any scrip listed in for 'information list' or 'current watch list'.
- h) A client or group of clients which persistently earn or incur high amount of loss through their trading activities or clients who appear to have executed trades with the objective of transfer of profits or losses.
- i) A client who is holding more than 5% of paid up capital of a listed company and has pledged 100% of his/her/it's such holding for margin purpose and who has also significant trading volume in the same scrip which he/she/it holds.
- j) In case of a client or a group of clients who have been identified as per any of the above 9 criteria and whose orders are placed through a dealing office which is far from such client's address as per his/her/its KYC.
- k) A client having demat account and holding in a scrip of more than 5% of paid up capital of a listed company which has received the same shares through off-market transfer.

- l) A client who has received shares of a listed company through multiple off-market transfer and has pledged such shares.
- m) Identification of IP addresses of clients to identify multiple client codes trading from same IP address.
- n) Clients who are connected with each other as per key KYC parameters of the clients as updated by respective client.

Alerts for Depository Operations:

- a) Multiple Demat accounts opened with same PAN/mobile number/ email ID/ bank account details/ address. While reviewing BO account details, the details of existing BO shall also be considered.
- b) Email/ letters sent to clients on their registered email ID/address which bounces/ returns undelivered.
- c) A BO who has submitted modification request frequently for changes in his/her/its demat account details of address, email id, mobile number, bank details, POA holder, Authorised Signatory etc.
- d) Frequent off-market transfer of securities by a BO in a specific period without genuine reasons.
- e) Off-market transactions not commensurate with the income/networth of the BO.
- f) Pledge transactions not commensurate with the income/networth of the BO.
- g) Off market transfer of High value transactions immediately after modification of details demat account like email ID/mobile number/address/bank.
- h) Review of reasons for off-market transfer provided by the BO which appears non-genuine based on either profile of the BO or on account of reason codes, including frequent off-market transfer

with reason code gift/donation to unrelated parties and/or with reason code off-market sales.

- i) Sudden increase in transaction activity in a newly opened account in a short span of time. An account in which securities balance suddenly reduces to zero and an active account with regular transaction suddenly becomes dormant.
- j) Any other alerts and mechanism in order to prevent and detect any type of market manipulation activity carried out by their BO.

4. Review, Processing, Disposal and Closure of alerts and action:

- 4.1. The Company shall identify suspicious/ manipulative activities undertaken by any client through monitoring of transactions, orders and trades.
- 4.2. The designated officials who are tasked to monitor the alerts on daily basis and carry out the Due Diligence of their clients on an ongoing basis. Alerts provided by Stock Exchanges/ Depository shall be reviewed on an ongoing basis so as to ensure to process the same as early as possible. In any case, these alerts will be processed within prescribed time frame of 30-45 days from the date of generation of the alert by the Stock Exchanges/ Depository. In case of any delay in disposing off any alerts, reasons for the same shall be recorded.
- 4.3. After analyzing and due diligence that the alert is required to be closed, the designated official shall close the same with appropriate remarks. The designated official shall after due diligence and making such inquiry as necessary to that the alert required an action, the official will forward the same with his/her views to the Compliance Officer for his/her approval.
- 4.4. The Compliance Officer, after review of the alerts along with the submitted comments of the designated official, decides to close the alert, he/she shall close it with appropriate remarks. If the Compliance Officer finds that action in respect of such alert is warranted, he/she shall take such actions including filing STR with FIU-India, informing to Stock Exchanges and CDSL and/or discontinue the relationship with the client.
- 4.5. In case of reporting of any transaction as STR to FIU-India, shall evaluate whether any further action including disassociating with the suspect client(s) and reporting to CDSL/SEBI and/or other Regulatory Authorities.

- 4.6. The report of such instances along with adverse observations and details of actions taken shall be submitted to the Stock Exchanges/ CDSL within 7 day from date of identification of such instances.
- 4.7. The Member shall, in case of reporting of any transaction as STR to FIU-India, shall evaluate whether any further action including suspension of the trading activity of the suspect client(s), reporting to Stock Exchanges/SEBI and/or other Regulatory Authorities.

5. Maintenance of Records:

- 5.1. The Company shall maintain records for such period as is prescribed under PMLA (Maintenance of Records) Rules, 2005, and Securities Contracts (Regulation) Rules, 1957, SEBI (Depository and Participants) Regulations, 1996, DP Operating Instructions and any other directions as may be issued by SEBI/ Stock Exchanges from time to time.
- 5.2. The records of alerts generated, disposed of as closed and details of action taken wherever applicable shall be maintained with such security measures as would make such records temper proof and the access is available on to designated officials under the supervision of the Compliance Officer.

6. Obligations of Compliance Officer/ Designated Director and Internal Auditor of the Stock Broking Business and Depository Participant operations:

- 6.1. The surveillance activities of the Stock Broking and Depository operations shall be conducted under overall supervision of the Compliance Officer. The policy implemented shall be in accordance with the provisions of Prevention of Money Laundering Act, 2002 and rules made thereunder as Reporting Entity.
- 6.2. A quarterly MIS shall be put up by the Compliance Officer to the board and the Designated Director giving number of alerts generated during the quarter, number of alerts closed, number of alerts on which action taken with details of action taken and number of alerts pending at the end of the quarter along with reasons for pendency and action plan for closure. The Board as well as the Designated Director shall be appraised of any exception noticed during the disposal of the alerts.

6.3. The Designated Director shall be responsible for all surveillance activities carried out by the trading member.

6.4. The Member shall submit its surveillance policy to the internal auditor for review and shall satisfy the queries/questions, if any, raised by the internal auditor with respect to the implementation of the surveillance policy, its effectiveness and the alerts generated.

7. Obligation of Quarterly reporting of status of the alerts generated for Stock Broking and Depository Participant Operations:

7.1. A quarterly statement providing duly approved status of alerts in respect of stock broking operations on quarterly basis shall be submitted to BSE and NSE in the following format within prescribed time limit from the end of the quarter:

A. Status of Alerts generated by the Trading Member:

Name of Alert	No. of alerts under process at the beginning of quarter	No. of new alerts generated in the quarter	No. of alerts Verified & Closed in the quarter	No. of alerts referred to Exchange (*)	No. of alerts pending/ under process at the end of quarter

B. Details of alerts referred to the Exchange

Sr. No.	Date of Alert	Type of Alert	Brief observation and details of action taken	Date referred to Exchange

C. Details of any major surveillance action taken (other than alerts referred to Exchanges) if any during the quarter

Sr. No.	Brief action taken during the quarter

In case of member does not have anything to report, a “NIL Report” shall be submitted within the prescribed time limit from the end of the quarter.

- 7.2. A quarterly statement providing duly approved status of alerts in respect of DP operations on quarterly basis shall be submitted to CDSL in the following format within prescribed time limit from the end of the quarter:

A. Status of Alerts generated by the Depository Participant:

Name of Alert	No. of alerts under process at the beginning of quarter	No. of new alerts generated in the quarter	No. of alerts Verified & Closed in the quarter	No. of alerts referred to CDSL (*)	No. of alerts pending/ under process at the end of quarter

B. Details of any major surveillance action taken (other than alerts reported to CDSL) if any during the quarter

Sr. No.	Brief action taken during the quarter

In case of DP does not have anything to report, a “NIL Report” shall be submitted within prescribed time limit from the end of the quarter.

8. Periodic Review:

The Surveillance Policy shall be reviewed on periodic basis and at least once a year by the Compliance Officer to ensure that the same is updated in line with market trends, updated regulations and practices.

For Shree Tisai Securities Private Limited

Authorized Signatories