



SVV Share & Stock Brokers Pvt. Ltd.

Member : The Stock Exchange, Mumbai Clg. No. 662

603-A, P. J. Tower, Dalal Street, Fort, Mumbai - 400 023.

Tel. : 022 - 2272 3133 / 37 / 38 • Fax : 2272 3134 • E-mail : svvcm662@rediffmail.com

CIN No. : U67120MH1997PTC105633

SURVEILLANCE POLICY

Introduction:

The policy is framed in compliance with requirement of Stock Exchanges/CDSL accordance with the provision of SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2021/22 dated 01.03.2021

Objective:

This Surveillance Policy is being framed pursuant to the above referred Circulars. The objective of this Policy is to put in place a surveillance mechanism to ensure effective monitoring of transactions of the depository clients.

Transaction Alerts:

The Policy covers various surveillance alerts generated internally or as received from Exchanges/CDSL and NSDL. CDSL is providing transaction alerts on the threshold defined by CDSL to all the DP through CDSL report download utility or by mail. The alerts to be generated based on the parameters set out below:

- Alert for multiple demat accounts opened with same demographic details: Alert for accounts opened with same PAN /mobile number / email id/ bank account no. / address considering the existing demat accounts held with the DP.
- Alert for communication (emails/letter) sent on registered Email IDs/addresses of clients are getting bounced.
- Frequent changes in details of demat account such as address, email id, mobile number, Authorized Signatory, POA holder etc.
- Pledge transactions not commensurate with the income/net worth of the client.
- Frequent Off-Market transfers by a client in a specified period
- Off-market transfers not commensurate with the income/net worth of the client.
- Off-market transfers (High Value) immediately after modification of details in demat account
- Review of reasons of off-market transfers provided by client for off-market transfers vis- à-vis profile of the client e.g. transfers with reason code Gifts with consideration, frequent transfers with reason code Gifts/Donation to unrelated parties, frequent transfers with reason code off-market sales
- Alert for newly opened accounts wherein sudden Increase in transactions activities in short span of time and suddenly holding in demat account becomes zero or account becomes dormant after some time.
- Any other alerts and mechanism in order to prevent and detect any type of market manipulation activity carried out by their clients.

Scrutiny & Disposal of the Transaction Alerts:

- The DP Operations team shall be responsible for analysing the alerts raised on a daily basis the parameters defined above for analysing the transaction alerts raised internally by the DP Operations team:
 - a. System generated reports, wherever available to be downloaded on a daily basis.
 - b. Obtain transaction rationale and also obtain such supporting documents as may be required from the client.



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c. After analysing the documentary evidences, including the bank / demat statement, if any, the DP Operations team shall record their preliminary observations for such identified transactions or client/ group of client and share the same with the Compliance Officer within 2 days from the date of generation of alerts.

d. In case the Compliance Officer concludes the adverse observation to the alert, he/she shall inform CDSL within 2 days from date of identification of adverse observation. With respect to the transactional alerts provided by Stock Exchanges/CDSL and / or NSDL, the DP Operations team and the Compliance Officer shall ensure that all alerts are reviewed and status thereof (Verified & Closed/Verified & Reported to Depository) including action taken is reported to CDSL immediately as per the prescribed process by Stock Exchanges/CDSL and NSDL and in case of delay reason should be documented.

- The records of alerts generated, disposed of as closed and details of action taken wherever applicable shall be maintained either in physical/electronic format by the DP Operations team 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.

Obligations of Compliance Officer/ Designated Director and Internal Auditor:

- The surveillance activities of the Depository operations shall be conducted under overall supervision of the Compliance Officer of the Company. The policy shall be implemented by the Company in accordance with the provisions of Prevention of Money Laundering Act, 2002 and rules made thereunder.
- A quarterly MIS shall be put up to the Board on the number of alerts pending at the beginning of the quarter, generated during the quarter, processed and acted upon during the quarter and cases pending at the end of the quarter along with reasons for pendency and action plan for closure. Also, the Board shall be apprised of any exception noticed during the disposal of alerts.
- Internal auditor shall review the surveillance policy, its implementation, effectiveness and review the alerts generated during the period of audit and shall record the observations with respect to the same in their report.
- Internal Auditor shall verify that the quarterly MIS is prepared and placed before the Board.
- The Designated Director will be responsible for all surveillance activities carried out by the Trading Member.

Reporting requirements:

The Compliance Officer shall report the alerts along with its analysis on a quarterly basis, in the prescribed format to CDSL within 15 days from end of every quarter starting from the quarter ending December 31, 2021.

In case there are no transactions to be reported during the quarter end within 15 days from the end of the quarter a NIL report to be submitted

Effective Date:

This Policy is reviewed on October 18, 2024.

Policy Review:

The Policy shall be reviewed annually by the Compliance Officer to ensure that the same is updated in line with market trends, applicable



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Approval of policy by the Director.

We have approved the program as reasonably designed to achieve and monitor company's ongoing compliance with the requirements and the implementing regulations under it.

SVV Share & Stock Brokers Private Limited

Neema K Dalchianis
Director

Regd. Office : A/1, Mandvi Navjeevan, 121/127, Kazi Syed Street, Masjid, Mumbai - 400 003.

Tel. : 022 - 2344 0244 / 2344 0149 / 2342 9782 / 2346 4366