



Member : BSE, NSE, NSE F & O & CDSIL

Policy For FIU:

- We always check any abnormal activity or event or alert through Back Office Software.
- The Reason for abnormal activity may include the following:
 - Zero Brokerage charged.
 - Inactive client trades.
 - Abnormal Turnover based on Gross value.
 - Abnormal Turnover based on Net value.
 - A client has abnormal Profit or loss from the trades.
- The Exchanges and Depositories also raise alert, which are checked by the Compliance officer on every 1st day of the month and also as and when received.
- The Customer due diligence is done for logical evaluation for the alerts, including Talking to the client and asking for further data and details about the alert.
- Once the alert is received the Compliance officer do due diligence and decide about the abnormality is suspicious enough to be eligible for reporting to FIU or close it.
- The Compliance officer is responsible for periodic review of process & documentation of the suspicious alerts and closed alerts.

IDENTIFYING IRREGULAR TRADING REGISTRATION OF NEW CLIENTS • Clearly establishing identity of clients, verify PAN & other documents with originals. • Known introducer. EXISTING CLIENTS. Obtaining annual financial data. MONITORING OF SUSPICIOUS TRANSACTION . Sudden substantial increase in activity or transaction with no apparent economic rationale. • Sudden substantial activity in dormant account. • Clients transferring large sums of money to or from overseas account. REPORTING OF SUSPICIOUS TRANSACTION • Any report generated from above monitoring. • Escalation through the organization to the Principal Officer & who in turn will report FIU • Confidentiality & retention of reports.

SAURASHTRA CAPITAL SERVICES PVT.LTD.

DIRECTOR

Last review dated : 23rd November, 2023