



## DP Surveillance Policy

As per CDSL Communique No. CDSL/OPS/DP/SYSTEM/2021/309 dated July 15, 2021 We frame the DP Surveillance Policy as below :

- i. Generation of suitable surveillance alerts which may be guided by indicative themes (the list is inclusive and not exhaustive) given below :

Sr. No.	Indicative themes:
1	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.
2	Alert for communication (emails/letter) sent on registered Email id/address of clients are getting bounced.
3	Frequent changes in details of demat account such as, address, email id, mobile number, Authorized Signatory, POA holder etc.
4	Frequent Off-Market transfers by a client in a specified period
5	Off-market transfers not commensurate with the income/Networth of the client.
6	Pledge transactions not commensurate with the income/Networth of the client.
7	Off-market transfers (High Value) immediately after modification of details in demat account
8	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
9	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.



10	Any other alerts and mechanism in order to prevent and detect any type of market manipulation activity carried out by their clients.
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ii. Review and disposal of transactional alerts provided by CDSL (Transactional alerts provided by CDSL will be based on some thresholds. we may have our own different thresholds or own parameters to generate additional alerts of their own in point I above, so as to detect any suspicious transaction activity).

iii. Disposal of alerts within 30 days from the date of alerts generated at our end and alerts provided by CDSL.

iv. Reporting to CDSL and other authorities as applicable, in case of any abnormal activity.

v. Documentation of reasons for delay, if any, in disposition of alerts.

vi. Framework of appropriate actions that can be taken by the Participant as per obligations under Prevention of Money Laundering Act (PMLA)

vii. Record maintenance for the period as stipulated under applicable statutes

viii. The surveillance policy shall be reviewed once in a year.

All the DP obligations mentioned in the above CDSL communique to be followed as per requirement by the Compliance Officer and DP staff team.

**For Saurashtra Capital Services Pvt. Ltd. -29400**



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

**EXTRACT OF THE RESOLUTION PASSED AT THE MEETING OF THE BOARD OF SAURASHTRA CAPITAL SERVICES PRIVATE LIMITED HELD AT THE REGISTERED OFFICE OF THE COMPANY AT 39, GREAT WESTERN BUILDING COMPOUND, 1ST FLOOR, BAKEHOUSE LANE, FORT, MUMBAI - 400001 ON 10<sup>th</sup> AUGUST 2023 AT 4.00 P.M.**

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RESOLVED THAT As per CDSL Communique No. CDSL/OPS/DP/P OLCY/2023/363 dated June 21, 2023 the DP Surveillance Policy framed today is approved by the board. All the DP obligations mentioned in the above communique to be followed as per requirement by the Compliance Officer and DP staff team.

CERTIFIED TO BE TRUE COPY.

For and on behalf of the Board

SD/-

Director (Paras Sanghvi DIN No. 1295085)

Place: Mumbai

Date: 10.08.2023