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Surveillance DP policy 2023  
Saurashtra Capital Services Pvt. Ltd. (SCSPL)

### DP Surveillance Policy

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

A) Obligation of SCSPL as per surveillance policy.

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

a) SCSPL shall generate alerts for multiple Demat accounts opened with same demographic details: Alerts for accounts opened with same PAN /mobile number / email id/ bank account no. / address considering the existing Demat accounts held with the SCSPL

b) SCSPL shall generate Alerts for communication (emails/letter) sent on registered Email id/address of clients are getting bounced.

c) SCSPL shall generate Alerts for frequent changes in details of Demat account such as, address, email id, mobilenumber, AuthorizedSignatory, POA holder etc.

d) SCSPL shall generate Alerts for Frequent Off-Market transfers by a client in a specified period

e) SCSPL shall generate Alerts for Off-market transactions if they are not commensurate with the income/ Net worth of the client.

f) SCSPL shall generate Alerts for Pledge transactions not commensurate with the income/Net worth of the client.

g) SCSPL shall generate Alerts for Off-market transfers (High Value) immediately after modification of details in Demat account.

h) SCSPL shall generate Alerts for 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.

i) SCSPL shall generate Alerts 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.

j) SCSPL shall generate 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 & Disposal of transactional alerts as per thresholds provide by CDSL within 30 days. (Transactional alerts provided by CDSL will be based on some thresholds. SCSPL May have their 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 07 days from the date of alerts generated at SCSPL

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) SCSPL maintain physical register for record maintenance for the period as stipulated under applicable status.

viii) The surveillance policy of the DPs shall be reviewed once in 2 years

B) Obligation approval of the board for the Surveillance Policy.

SCSPL shall generate the above mentioned alerts as per its illustrative parameters/ thresholds. SCSPL should analysis and review there alerts based on facts and verification of relevant documents including income/net worth as provided by BO. SCSPL shall exercise their independent judgment and take appropriate action in order to detect any abnormal or suspicious transactions.

C) SCSPL obligations regarding client Due Diligence :

1. SCSPL shall carry out the Due Diligence of their clients on an ongoing basis.
2. SCSPL shall ensure that key KYC parameters of the clients are updated on a periodic basis as prescribed by SEBI and latest information of the client is updated in Depository System.

D) SCSPL obligation for reporting the status of alerts generated.

1. Disposal of alerts within 07 days from the date of alerts generated at SCSPL end.
2. Disposal of alerts within 30 days from the date of alerts generated at CDSL end.

E) Obligation of SCSPL

SCSPL shall conduct the surveillance activities under the overall supervision of its Compliance Officer. 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.

F) Obligation of Compliance officer and Internal Auditor/Concurrent Auditor of the SCSPL

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i) SCSPL shall provide duly approved status of the alerts on a quarterly basis, in the following format to CDSL within 15 days from end of the quarter

Name of Alert

No. of alerts pending at the beginning of quarter

No. of new alerts generated in the quarter

No. of alerts Verified & closed in the quarter

No. of alerts reported to Depository

No. of alerts pending process at the end of quarter

ii) SCSPL in aware that in case of any non-compliance with respect to surveillance obligations which may inter alia include delay in processing of alerts generated by DP / provided by CDSL and repeated instances of delay in reporting of the status of alerts, may result in further disciplinary action as deemed fit in terms of DP Operating instructions and Bye-laws of Depositories.

Thanks and Regards,

Saurashtra Capital Services Pvt. Ltd.

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