POLICY ON SURVEILLANCE OF TRANSACTION ALERTS.

Background

Exchanges have put in place a mechanism that will generate automated alerts for Stock Brokers & Trading Members whenever suspicious transactions are detected in their clients" accounts. The alerts will be generated in case of unusual changes in the trading pattern of the clients, sudden trading in dormant accounts as also in suspected cases of circular trading, 'pump-and-dump', „front running" and 'wash-sale' activities etc.
In view of the above, the following document describes the Surveillance policy followed by Astha Credit & Securities Private Limited hereinafter referred as Rupeezy. Rupeezy endeavours to frame this policy for surveillance of these alerts and the manner of disposal of the same.

The said surveillance and disposal of the alerts shall be done on the following grounds:
Receipt of „Alerts" from Exchanges / generated at member's end.

1. Time frame for disposition of alerts and if there is any delay in disposition, reason for the same shall be documented.

2. Suspicious / Manipulative activity identification and reporting process.

3. Record Maintenance.

In this regard, in order to facilitate effective surveillance mechanisms at the Broker level, the Exchanges have derived following transactional alerts that would be downloaded to the trading members. This will facilitate Rupeezy to effectively monitor the trading activity of its clients.

List of Transactional Alerts to be provided by BSE & NSE Sr. No.	Transactions Alerts
1	Significantly increase in client activity
2	Sudden trading activity in dormant account
3	Clients/Group of Client(s), deal in common scrips
4	Client(s)/Group of Client(s) is concentrated in a few illiquid scrips
5	Client(s)/Group of Client(s) dealing in scrip in minimum lot size
6	Client / Group of Client(s) Concentration in a scrip
7	Circular Trading
8	Pump and Dump
9	Wash Sales of Trades
10	Reversal of Trades
11	Front Running

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12	Concentrated position in the Open Interest / High Turnover concentration
13	Order book spoofing i.e. large orders away from market
14	Alerts for client trading in FO Segment with 70+ age
15	Clients with Alerts based on their occupation and Income Range

Client(s) Information:
1. Rupeezy is required to carry out the Due Diligence of its client(s) on a continuous basis.

2. Rupeezy shall ensure that key KYC parameters are updated on a continuous basis as prescribed by SEBI and latest information of the client is updated in UCC database of the Exchange.

3. Based on KYC and updated information Rupeezy shall establish groups/ association amongst clients to identify multiple accounts / common account/ group of clients.

1. Time frame for disposition of alerts

The monitoring of the aforementioned alerts and disposal procedure shall be done within 45 days of the alert generation.

2. Suspicious / Manipulative activity identification and reporting process:

a. Unexplained, unusual or abnormal transactions which are not in line with the normal expected trend of transactions in the account are required to be identified and should be reported accordingly.

b. In view of the above, Rupeezy shall download the aforementioned alerts in addition to the existing internal monitoring of the transactions.

c. Upon receipt of alerts, the same are to be forwarded to the concerned client(s) seeking an explanation/clarification from the client(s) reason behind carrying out such trade(s) in their accounts.

d. In addition to above, Rupeezy also seeks documentary evidence from clients such as bank statement / updated financial statement .

i. In case of funds, Bank statements of the Client(s) / Group of Client(s) from which funds pay-in have been met, to be sought.

ii. In case of Securities, Demat account statements of the Client(s)/ Group of Client(s) from which securities pay-in has been met, to be sought. The period for such statements may be at

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least +/- 15 days from the date of transactions to verify whether the funds / securities for the settlement of such trades actually belongs to the client for whom the trades were transacted.

e. After analyzing the documentary evidences, Rupeezy should record its observations for such identified transactions or Client(s)/Group of Client(s).Rupeezy need to deal with alerts on case to case basis considering the magnitude of alert, in case of repeated alert further exposure to client should be withdrawn immediately.

f. In case adverse observations are recorded then Rupeezy shall report all such instances to the Exchange **within 45 days of the alert generation**.

g. Rupeezy may seek extension of the time period from the Exchange, wherever required.

Steps to be followed in respect of transactional alerts

Alerts Received
TM to review the alerts based on a. Type of alert downloaded by the Exchange b. Financial details of the client c. Past Trading pattern of the clients/ client group d. Bank / Demat transaction details (The period for such statements may be at least +/- 15 days from the date of transactions) e. Other connected clients in TM‟s UCC (common email/ mobile number/ address, other linkages, etc.) f. Other publicly available information If any concern seen post inquiry/ receipt of explanation from client, Rupeezy to forward the alerts to the Exchange with comments if any and documents deemed relevant.

3. Record Maintenance

As per Rupeezy Anti Money Laundering policy, the background including all documents / office records / clarifications sought pertaining to such transactions & purpose thereof shall be examined carefully & finding shall be recorded in writing. Documents & records should be made

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available to auditors & SEBI /Stock Exchanges / FIUIND etc. Records are required to be preserved for 5 years.

4. Maintenance of MIS

A quarterly MIS shall be placed before the Board on the number of alerts generated during the quarter, disposed off during the quarter and pending at the end of the quarter.
Reasons for pendency shall be discussed and appropriate action shall be taken. Also, the Board shall be apprised of any exception noticed during the disposition of alerts.

5. Role of Compliance Officer & Designated Directors

a. The Compliance Officer shall supervise the overall process of surveillance and reporting and shall be responsible for the record maintenance and reporting of such activities.

b. Designated Directors and Compliance Officer would be responsible for all surveillance activities carried out by Rupeezy.

This Surveillance Policy is subject to the review of the Internal Auditor of Rupeezy, who shall verify its implementation, effectiveness and review the alerts generated during the period of audit. Internal auditor may record the observations with respect to the same in their report.

Approved By: Satish Chandra Gupta
Director

Revision History:

Version:	Release Date	Reason for Change	Change Description
1	19-05-2023	NEW	NEW RELEASE
2	06-05-2024	ANNUAL REVIEW	Our trademark is registered in the name of “Rupeezy” and the same is updated.
3	02.05.2025	Annual Review	No Change
4	15-04-2026	Annual Review	No Change

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