

# VT CAPITAL MARKET PRIVATE LIMITED

Registered Office: 27AB Royd Street, Ground Floor, Kolkata-700016  
Member-NSE-14759, BSE-4020 & MCX-35970 SEBI Reg no: INZ000168637

## SURVEILLANCE POLICY

### STEPS TO BE FOLLOWED IN RESPECT OF TRANSACTIONAL ALERTS

#### Client(s) Information:

Trading Members are required to carry out the Due Diligence of its client(s) on a continuous basis. Further, Trading Members shall ensure that key KYC parameters are updated on a periodic basis as prescribed by SEBI and latest information of the client is updated in UCC database of the Exchange. Based on this information the Trading Member shall establish groups / association amongst clients to identify multiple accounts / common account / group of clients.

#### 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, TM to forward the alerts to the Exchange with his comments and any documents deemed relevant.
  - The surveillance policy of the Trading Member shall be approved by its Board.



- In case of any adverse findings / comments, the Trading Member shall send its comments to the Exchange within 45 days of the alert generation. The Trading Member may seek extension of the time period from the Exchange, wherever required.
- A quarterly MIS shall be put up to the Board on the number of alerts pending if any at the beginning of the quarter, 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 taken. Also, the Board shall be apprised of any exception noticed during the disposition of alerts.
- Designated directors / Compliance Officer would be responsible for all surveillance activities carried out by the Trading Member and for the record maintenance and reporting of such activities.