

Surveillance Obligation Policy

**Sapphire Wealth
Management Services
Pvt. Ltd.**

Effecting From 1st April 2013.

In pursuant to NSE Circular Ref No 831/2013 dated 7/3/2013 the surveillance policy is hereby made as follows:

(A) Receipt Of Alert From Exchange/Generated at member ends:

- EOD on a daily basis , the responsible/authorized executive shall download the data from exchange /check the software for any alert that has been generated.
- On such alert ,he will immediately enter the said data into a database, as prescribed for record and further action.
- The executive will then bring into the notice of compliance officer.

(B) Time Frame for disposition of alert:

- The Compliance office shall dispose off the alert in 15 trading days to the satisfaction of all
- In case of delay in disposition, reason to be listed.

(C) Process of checking /analyzing of alert:

- Seek explanation from such identified client(s) /group of client(s) for entering into such transactions.
- Seek documentary evidence such as bank statement / demat transaction statement or any other documents to satisfy it self.
 - In case of funds, Bank statement of the clients /group of clients from which funds pay-in have been met ,to be sought.In case of securities ,demat account statements of the clients / group of clients from which securities pay in has been met to be sought.
 - The period for such statement may be at 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.

**(D) Suspicious / Manipulative activity
identification and reporting process:**

- The compliance officer will analyse the alert so generated on various parameter as defined.
- If found anything to be of suspicious nature, the same will be brought to the notice of the Board , & subsequent information to the Exchange.
- Then entire process has to be completed within 45 days from the date of report.

(E) Record Maintenance :

- A record of all such reporting and action taken will be maintained for 365 days.