



**Policy for Surveillance Obligations for Trading Members**

<b>1) Transactional Alerts checked closely are as follows:</b>
Significant increase in client activity
Sudden trading activity in dormant account
Clients/Group of Client(s), dealing in common scrips
Client(s)/Group of Client(s) concentrated in a few illiquid scrips
Client(s)/Group of Client(s) dealing in scrip in minimum lot size
Client / Group of Client(s) Concentration in a scrip
Circular Trading
Pump and Dump
Wash Sales
Reversal of Trades
Front Running
Concentrated position in the Open Interest / High Turnover concentration
Order book spoofing i.e., large orders away from market

**2) Client(s) Information:**

BTSPPL carries out the Due Diligence of its client(s) on a continuous basis. Further, BTSPPL ensures 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. Based on this information BTSPPL establish groups / association amongst clients to identify multiple accounts / common account / group of clients.

**3) Analysis:**

In order to analyze the trading activity of the Client(s) / Group of Client(s) or scrips identified based on above alerts, BTSPPL will 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 UCC (common email/ mobile number/ address, other linkages, etc.)
- f. Other publicly available information

**Note:** 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.

Time frame for disposition of alerts will be 30 days from the date of Alert generated at members end & a separate log book will be maintained for the same.