



## *Bhogilal Trikamlal Securities Pvt. Ltd.*

MEMBER: BSE LTD. & NSE LTD.

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### **DP Surveillance Policy**

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

- A) Obligation of Bhogilal Trikamlal Sec. Pvt. Ltd. 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) Bhogilal Trikamlal Sec. Pvt. Ltd. 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 Bhogilal Trikamlal Sec. Pvt. Ltd.
  - b) Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate Alerts for communication (emails/letter) sent on registered Email id/address of clients are getting bounced.
  - c) Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate Alerts for frequent changes in details of Demat account such as, address, email id, mobilenummer, Authorized Signatory, POA holder etc.
  - d) Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate Alerts for Frequent Off-Market transfers by a client in a specified period
  - e) Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate Alerts for Off-market transactions if they are not commensurate with the income/ Net worth of the client.
  - f) Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate Alerts for Pledge transactions not commensurate with the income/Net worth of the client.
  - g) Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate Alerts for Off-market transfers (High Value) immediately after modification of details in Demat account.
  - h) Bhogilal Trikamlal Sec. Pvt. Ltd. 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) Bhogilal Trikamlal Sec. Pvt. Ltd. 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) Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate any other alerts and mechanism in order to prevent and detect any type of market manipulation activity carried out by their clients.
- 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. Bhogilal Trikamlal Sec. Pvt. Ltd. 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 Bhogilal Trikamlal Sec. Pvt. Ltd end.
- 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) Bhogilal Trikamlal Sec. Pvt. Ltd. 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.

Bhogilal Trikamlal Sec. Pvt. Ltd. shall generate the above mentioned alerts as per its illustrative parameters/ thresholds.

Bhogilal Trikamlal Sec. Pvt. Ltd should analysis and review there alerts based on facts and verification of relevant documents including income/net worth as provided by BO.

Bhogilal Trikamlal Sec. Pvt. Ltd shall exercise their independent judgment and take appropriate action in order to detect any abnormal or suspicious transactions.

C) Bhogilal Trikamlal Sec. Pvt. Ltd obligations regarding client Due Diligence :

1. Bhogilal Trikamlal Sec. Pvt. Ltd shall carry out the Due Diligence of their clients on an ongoing basis.
2. Bhogilal Trikamlal Sec. Pvt. Ltd 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) Bhogilal Trikamlal Sec. Pvt. Ltd obligation for reporting the status of alerts generated.

1. Disposal of alerts within 07 days from the date of alerts generated at Bhogilal Trikamlal Sec. Pvt. Ltd end.
2. Disposal of alerts within 30 days from the date of alerts generated at CDSL end.

E) Obligation of Bhogilal Trikamlal Sec. Pvt. Ltd.

Bhogilal Trikamlal Sec. Pvt. Ltd 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 Bhogilal Trikamlal Sec. Pvt. Ltd

i) Bhogilal Trikamlal Sec. Pvt. Ltd 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) Bhogilal Trikamlal Sec. Pvt. Ltd 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.