



Bhogilal Trikamlal Securities Pvt. Ltd.

MEMBER: BSE LTD. & NSE LTD.

R-717/721, Rotunda Bldg., B. S. Marg, Fort, Mumbai - 400 023. || Tel.: 2272 1907 • Fax: 2272 2966
GST No.: 27AABCB5497N1Z2 || SEBI Regd. No.: INZ000218139 || CDSL Regd. No.: IN-DP-216-2016

SURVEILLANCE SYSTEM & INTERNAL CONTROL POLICY

(As per SEBI Circular SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/96/dated 04 July 2024)

1. Objective

The objective of this policy is to establish proper surveillance systems and internal control procedures in the dealing room and trading operations to ensure regulatory compliance and prevent misuse of trading facilities.

2. Dealing Room Controls

2.1 Restricted Entry

Unauthorized or restricted persons shall not be permitted entry into the dealing room during trading hours. Only authorized employees assigned for trading activities shall be allowed access.

2.2 Recording of Landline Phones

All landline telephones used for client communication and trading instructions shall be recorded. Such recordings shall be preserved for the period prescribed under applicable regulatory guidelines.

2.3 CCTV Surveillance

CCTV cameras shall be installed in the dealing room to monitor trading activities. Camera recordings shall be preserved as per regulatory requirements and may be produced for inspection when required.

2.4 Error Trade Monitoring

All error trades shall be properly documented and recorded. Any correction of error trades shall be carried out only with the approval of the Compliance Officer and maintained in a separate register/file.





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3. Staff Trading Controls

3.1 Annual CAS Review

Annual Consolidated Account Statements (CAS) of employees shall be reviewed for monitoring by the Principal Officer personal trading activities and ensuring compliance with internal policies.

4. Compliance & Monitoring

The Principal Officer shall be responsible for monitoring the implementation of this policy and ensuring adherence to regulatory requirements.

5. Effective Date

This policy shall come into force with immediate effect and shall remain applicable until amended or modified by the management.

Policy Prepared By: **Nirav B. Shah (Compliance Officer)**

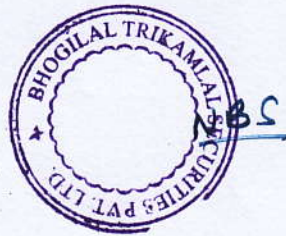
Approved By: **Board of Directors**

Date: **19th.March 2026.**

For and on behalf of Bhogilal Trikamlal Securities Pvt. Ltd.

Nirav Bharat Shah

Nirav Bharat Shah
(Director)





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R-717/721, Rotunda Bldg., B. S. Marg, Mumbai - 400 023. Tel.: 2272 1907 / 1936 / 1967 / 2331 / 2966 • E-mail: investors@btsec.co.in

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF THE BOARD OF DIRECTORS OF M/S BHOGILAL TRIKAMLAL SECURITIES PRIVATE LIMITED HELD ON 19TH MARCH, 2026 AT THE REGISTERED OFFICE OF THE COMPANY AT 717/721, ROTUNDA BLDG., M. S. MARG, FORT, MUMBAI.

“RESOLVED THAT pursuant to the provisions of applicable laws, rules and regulations, including the guidelines issued by SEBI and Stock Exchanges from time to time, the *Surveillance System & Internal Control Policy* as placed before the Board be and is hereby approved and adopted.

RESOLVED FURTHER THAT the said policy shall be implemented with immediate effect to ensure proper surveillance systems, internal control procedures in dealing room operations, and compliance with regulatory requirements.

RESOLVED FURTHER THAT Mr. Nirav B. Shah, Compliance Officer of the Company, be and is hereby authorized to monitor the implementation of the said policy and to ensure adherence to all applicable regulatory guidelines.

RESOLVED FURTHER THAT any Director of the Company be and is hereby authorized to sign, execute and file necessary documents, forms, declarations and to do all such acts, deeds and things as may be required to give effect to this resolution.”

CERTIFIED TRUE COPY

For Bhogilal Trikamlal Securities Private Limited

Bharat B. Shah

Bharat B. Shah

Director

Malti Bharat Shah

Malti B. Shah

Director

Nirav B. Shah

Nirav B. Shah

Director

