



### **SURVEILLANCE POLICY**

As per the requirement of Regulators our Compliance Officer, **Mr. Priyank Mehta**, is in-charge of surveillance related all activities.

He shall supervise online trading activities of our company and also download the surveillance alerts from the Stock Exchange system on daily basis.

The process of Due Diligence & scrutinizing each alert (client-wise/scrip-wise separately) should be carried out & completed within one week.

He shall call for necessary documents of each Client, Scrutinize all documents for necessary analyses and prepare conclusion against each alert.

After reasonable analyses, he will report the conclusion against each alert to Designated Director. The same shall be reported to the Exchange within reasonable time.

After due discussion, the necessary actions shall be taken under instructions from Designated Director, if required.

In case of any suspicious / manipulative undue activities of any Client, the same will be reported to the Exchange immediately.

Proper records of each alert and documents scrutinized should be maintained.

A quarterly MIS shall be put up to the Board of Director on the number of alerts pending at the beginning of the quarter, generated during the quarter, disposed off during the quarter and pending at 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.

For **Arham Commodity Brokers Pvt. Ltd.**

  
**Priyank Mehta - Director**

