

A dark blue vertical bar is on the left side of the page. A blue arrow points to the right from the middle of this bar.

# SURVEILLANCE POLICY ON TRANSACTIONAL ALERTS

A series of thin, curved lines in shades of blue and grey originate from the bottom left and fan out towards the right side of the page.

Enrich Financial Market Pvt Ltd.

## ENRICH SURVEILLANCE POLICY ON TRANSACTIONAL ALERTS

SUB: Monitoring and Reporting of Transactional Alerts.

REF MCX Circular Ref. No. MCX/S&I/380/2016 dated November 3<sup>rd</sup> 2016

Ref NSE Circular Ref No NSE/INVG/22908 dated March 07,2013

### Trading Member Obligation:

Exchange is facilitating effective surveillance mechanism at Member Level, they are providing the alerts based on the trading activity which will be available in the Member Portal. They said, the alerts provided by them are indicative list and members have to formulate their own alerts in addition to the list provided by the Exchange.

### Monitoring and Reporting Process:

This is ongoing process under over all supervision from Compliance Officer (CO). CO has to analyse the trading activity of the clients and seek explanation from such clients identified when the alerts are received. After analysing the documentary evidence from the clients, CO has to document the observations and the same has to be submitted to the Exchange within 45 days of the alert generation. CO has to put up the Quarterly MIS w.r.t. the No. of alerts pending at the beginning of the quarter, generated & disposed during the quarter and pending at the end of the quarter to the Board.

### Internal Alerts from Enrich:

Over and above the alerts provided by the Exchange on certain parameters, we are developing Alerts our first parameters described below.

#### ALERT TYPE 1:

Making payment for the transactions:

Basic information of clients Annual Income Details should be considered which was available in client records / KYC, this should be compared with the Net Payment

(Gross Receipts – Gross Payments) received from the clients at a given point in time during the entire Financial Year

Values determined as Annual Income Details opted by client and fed in the system. If the value fed as less than 1 Lakh, the value should be considered as 1 Lakh and the alert should be generated on or above 10 Lakhs Net Pay-in. If the value fed as 1 to 5 Lakhs, the value should be considered as 5 Lakh and the alert should be generated on or above 50 Lakhs Net Pay-in of funds.

Extension of Time:

We can seek extension of time period from the Exchange wherever required if the timelines for reporting is not met due to unforeseen circumstances / difficulties.

Note: The Policy has been approved by its Board of Directors in Board Meeting held on 11.01.2017 at registered office of the company. Policy will be periodically reviewed on yearly basis.

Policy revised on 17.06.2019 for adding additional exchange of NSE.