

SURVEILLANCE POLICY

INTRODUCTION

This policy is to have in place an effective market surveillance mechanism to ensure investor protection and to safeguard the integrity of the markets. The fairness of the markets is closely linked to investor protection. This monitoring is required to observe the transactions done intentionally will have an abnormal effect on the price and / or volumes of any share, which is against the fundamental objective of the Securities Market.

BACKGROUND

The surveillance policy covers the maintenance and disposition of alerts from exchanges or generated at our end.

POLICY

In order to fulfill all the conditions and to maintain the transactional alerts received from exchanges or generated at our end, the following steps have been taken by us to review and dispose the alerts

1. Review the type of alert downloaded by exchange or generated at our end
2. Financial details of the client
3. Past trading pattern of the clients/client group
4. Bank/demat transaction details

In order to have in depth analysis of the above transactional alerts, the following due diligence shall be taken:

1. Due diligence of client(s) are done on a continuous basis. Financial information of clients are also updated.
2. In order to analyze the trading activity of the clients, detailed information is received from clients.

After analysis of the documents, the observations are recorded for such transactions

MONITORING AND REPORTING

The surveillance process is conducted under the supervision of the compliance officer and based on facts/ circumstances, adequate precautions have been taken.

Review Policy: This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs.

For & on behalf of INMACS LIMITED

Sd/-

Vinod Jain (Director)