



SURVEILLANCE POLICY

| Company | Registered as | Member of | SEBI Reg. No. |
|---|------------------------|---------------------|-----------------|
| Taurus Corporate Advisory Services Limited | Stock Broker | NSE, BSE, MSEI, MCX | INZ000258036 |
| | Depository Participant | CDSL | IN-DP-646-2021 |
| | Merchant Banker | SEBI | MB/INM000011740 |
| Taurus Treasury Management Services Private Limited | Portfolio Manager | SEBI | PM/INP000004490 |
| Taurrus Finsec Private Limited | Stock Broker | BSE | INZ000156633 |

SEBI vide its Master Circular Ref: SEBI/HO/ISD/ISD/CIR/P/2021/22 dated March 01, 2021 and further vide Master Circular Ref: SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023 on Surveillance of Securities Market has provided guidelines for Surveillance Measures to be implemented by various market intermediaries.

Accordingly, the Surveillance Policy for the company is modified to the extent of adoption of the SEBI guidelines as mentioned above.

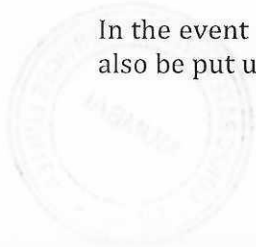
The team is requested to kindly adhere to the norms as prescribed in the Master circular and follow the internal code of conduct strictly, do not circulate or be part of the circulation of any rumours or any unverified news. Further, no staff is permitted to use any blogs/chat forums/messenger sites for circulating as of any unverified news received from any client, industry, any trade or any other sources. Only approved forwards, circulations can be shared.

With respect to the transactional alerts being downloaded from the Exchanges/generated by the Company, the following activities will be carried out based on UCC parameters.

A Broker can suspend/close the client account and also withhold the pay-outs of client if there is any judicial or/and regulatory order/action requiring suspension/closure of client's account. The Stock Broker can also suspend/close the client account if the Stock Broker observes any abnormal or suspicious activity in the client account through its monitoring and surveillance of the client account.

The Stock Broker may also temporarily suspend/close the client account if there is no activity in the client account for a period, as deemed fit by the Stock Broker from time to time. (Refer to Inactive Client Policy). The client's account can also be put under temporary suspension/closure if the client has not cleared the uncovered debit in its account or if the client has not submitted Know Your Client (KYC) details sought by the Stock Broker to fulfill its own surveillance or exchange related requirements.

In the event of information/reports reaching the Stock Broker of the client's death, the account can also be put under temporary suspension/closure. The Stock Broker can also put the client's account





under temporary suspension/closure if the client has failed to provide or update its communication details like correspondence address, Mobile number, landline numbers or E-mail ID. The client may also request the Stock Broker to temporarily suspend/close his account, Stock Broker may do so subject to client accepting / adhering to conditions imposed by Stock Broker including but not limited to settlement of account and / or other obligation.

The Master Circulars require compliance in terms of Formulation of rules, Monitoring the implementation and disclosure. With a view to adhere to the policy framework, the team needs to get equipped with the circulars in detail and ensure compliance.

The latest circular is available at: <https://www.sebi.gov.in/legal/master-circulars/mar-2023/master-circular-on-surveillance-of-securities-market-69244.html>

❖ CLIENTS INFORMATION:

Due Diligence of its client(s) will be carried out on a continuous basis. It will also be ensured that key KYC parameters are updated on a continuous basis as prescribed by SEBI, all KYC attributes along with the latest information of the client is updated in UCC database of the Exchange/Depository. Based on this information, the Company will establish groups / association amongst clients to identify multiple accounts / common account / group of clients.

Mandatory verifying the Aadhar and PAN of the client while generating the UCC and updation on re-activation of the client account, in case it was deactivated for any reasons.

Risk parameters to be set for each of the client during onboarding and to be analysed on regular basis

❖ ANALYSIS:

In order to analyse the trading activity of the Client(s) / Group of Client(s) or scrip's identified based on above alerts, Company will:

- a. Seek explanation from such identified Client(s) / Group of Client(s) for entering into such transactions.
- b. Seek documentary evidence such as bank statement / demat transaction statement or any other documents to satisfy itself
 - i. In case of funds, Bank statements of the Client(s) / Group of Client(s) from which funds pay-in have been met, to be sought. In case of securities, demat account statements of the Client(s)/Group of Client(s) from which securities pay-in has been met, be sought.
 - ii. The period for such statements may be at least +/- 15 days from the date of transactions to verify whether the funds / securities for the settlement of such trades actually belongs to the client for whom the trades were transacted.





- c. After analysing the documentary evidences, the Company will record its observations for such identified transactions or Client(s)/Group of Client.
- d. In case adverse observations are recorded, the Company will report all such instances to the Exchange within 15 days of the alert generation. The Company may seek extension of the time period from the Exchange, wherever required

❖ MONITORING, REPORTING AND DISPOSAL

Following procedure will followed for monitoring and reporting of alerts:

- A. Receipt of Alerts from Exchanges / generated in house
- B. Time frame for disposition of alerts and if there is any delay in disposition, reason for the same shall be documented.
- C. Suspicious / Manipulative activity identification and reporting process.
- D. Records and trails need to be maintained for all the alerts generated to its disposal
- E. Any exceptional events/alerts shall be put up to the Board along with the details of the number of such alerts pending unresolved over 30 days and newly generated. Reasons for pendency shall be discussed and appropriate action will be taken. The Board shall be apprised of any exception noticed during the disposition of alerts.
- F. The surveillance process shall be conducted under overall supervision of the head of the Departments, under the guidance of the Compliance officer.
- G. Compliance Officer will be responsible for all surveillance activities carried out by the Company and for the record maintenance and reporting of such activities.
- H. Based on facts and circumstances, the Company will exercise its independent judgment and will take adequate precaution.

Details of key personnel:

| Sr. No. | Particulars | KMP-1 | KMP-2 |
|---------|-------------|--|--|
| 01. | Designation | Principal Officer | Compliance Officer |
| 02. | Name | Mr. Mihir Mehta | Ms. Deepali Vartak |
| 03. | Contact No. | 022-61471100 | 022-61471177 |
| 04. | Fax No. | 022-26104925 | 022-26104925 |
| 05. | Email id | mihir.mehta@taurusgrp.com | deepali@taurusgrp.com |
| 06. | Grievances | grievance@taurusgrp.com | |
| 07. | Information | info@taurusgrp.com | |

For Taurus Corporate Advisory Services Limited

Sd/-

Ms. Deepali Vartak
Compliance Officer

Place: Mumbai

