

Comfort Securities Limited
Surveillance Policy

Client(s) Information:

We carry out the Due Diligence of its client(s) on a continuous basis. Further, we ensure that key KYC parameters are updated on a periodic basis as prescribed by SEBI and latest information of the client is updated in UCC database of the Exchange. Based on this information We establish groups / association amongst clients to identify multiple accounts / common account / group of clients.

Analysis:

In order to analyze the trading activity of the Client(s) / Group of Client(s) or scrips identified based on above alerts, we followed the following parametrs :

- 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.
 1. 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, to be sought.
 2. 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 analyzing the documentary evidences, including the bank / demat statement, we shall record its observations for such identified transactions or Client(s) / Group of Client(s).

Monitoring and reporting:

1. For effective monitoring, We will:

Frame a surveillance policy covering:

i. Receipt of Alerts from Exchanges / generated at member's end.

ii. Time frame for disposition of alerts and if there is any delay in disposition, reason for

the same shall be documented.

- iii. Suspicious / Manipulative activity identification and reporting process
- iv. Record Maintenance

A quarterly MIS shall be put up to the Board on the number of alerts pending at the beginning of the quarter, generated during the quarter, disposed off during the quarter and pending at the end of the quarter. Reasons for pendency shall be discussed and appropriate action taken. Also, the Board (in case of corporate trading member), Partners (in case of partnership firms) or Proprietor (in case of sole proprietorship firm) shall be apprised of any exception noticed during the disposition of alerts.

The surveillance process shall be conducted under overall supervision of its Compliance Officer. Designated directors / partners / proprietor / Compliance Officer would be responsible for all surveillance activities carried out by the Trading Member and for the record maintenance and reporting of such activities.