

BCB Brokerage Private Limited  
Surveillance policy  
June 5, 2013

Background

BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) have provided softwares to generate alerts for trading members

In view of the above, BCB Brokerage Private Limited has framed this policy to handle these surveillance alerts:

The disposal of the surveillance alerts shall be done as follows:

1. The Compliance Officer shall peruse the alerts received
2. For the alerts received, the Compliance Officer shall review the trades to
  - a. The KYC details of the clients
  - b. Financial position of the clients
  - c. Past trading patterns
3. Where there is a concern, the Compliance Officer will
  - a. Seek clarification for the client/ dealer/ RM along with supporting documents if required
4. In case of adverse observation
  - a. Matter will be reported to exchange for further action

The above policy has been approved at the meeting of the Board of Directors of BCB Brokerage Private Limited had on the 5<sup>th</sup> June 2013

For BCB Brokerage Private Limited

Sd/-  
(Uttam Bagri)  
Director