

Surveillance Policy

- Significantly increase in client activity: In case if there is Significantly increase in client activity we keep a watch on the client's activity and control the same if found anything suspicious
- Sudden trading activity in dormant account: A dormant client (those who have not traded since last 1 year) has been freeze from trading. If a Dormant client wants to trade then his trades are monitored closely.
- Clients/Group of Client(s), deal in common scrips: Normally we don't allow Clients / group of clients to deal in common scrip's, but if allowed than adequate margin is always maintained in form of cash or share collateral.
- Client(s)/Group of Client(s) is concentrated in a few illiquid scrips: All illiquid scrip's has been block for trading. If clients want to trade in illiquid scrip than client shall provide 100% margin.
- Client(s)/Group of Client(s) dealing in scrip in minimum lot size : We keep a watch on client trading activity and explanation is asked from the client if there is a sudden spurt in volumes.
- Client / Group of Client(s) Concentration in a scrip: We don't allow clients to have Exposure in any scrip of more than 25 % of the total debit amount.
- Circular Trading : We do not indulge in any kind of Circular trading. If Exchange gives us alert regarding the same then the client will be suspended from trading with immediate effect.
- Pump and Dump: We do not have any corporate listed companies and any clients associated with such companies, so the occurrence of Pump And Dump does not arise.]



- **Wash Sales: (Cash)** :We keep a watch on trading activity of the client and if any client is found putting the buy order at a higher price than prevailing price and similarly placing the \sale order lesser than the prevailing price.
- **Wash Sales: (Derivatives)** In derivative segment we keep a watch on the position of the clients and ensure that the concentrated position is not permitted.
- **Reversal of Trades:** we do not allow clients to do any reverse trades. Also Client code modification shall be done as per exchange norms of 1% penalty of total Trade value
- **Front Running :** We continuously ask for documentary evidence such as bank statement, demat statement in order to establish pay in and pay out routed through the designated account.
- **Concentrated position in the Open Interest / High Turnover concentration:** if any clients have huge position in any scrip that we make sure that Full initial and Exposure margin is available with us. Short Margin is not allowed.
- **Order book spoofing i.e. large orders away from market :** *Such alerts are reported to the management and we keep a record of its disposition*

We do not allow any suspicious manipulating activity and if we find any client indulging in such kind of activity, we immediately track the trading activity of such client and report to the management and FIU and the exchange.

The surveillance process is under direct supervision of compliance officer for all Compliance activity carried out by us.

Time frame for disposition of alerts: Within 48hours of alerts received.

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Authorized Signatory.

