

Member :	MCX	(Membership No.: 9080)	(FMC No.: MCX/TM/CORP/1694)
	NCDEX	(Membership No.: 0926)	(FMC No.: NCDEX/TM/CORP/0903)
	NMCE	(Membership No.: CL0364)	(FMC No.: NMCE/TCM/CORP/0289)
	ICEX	(Membership No.: 1038)	(FMC No.: ICEX/TM/CORP/0037)
	ACE	(Membership No.: 6070)	(FMC No.: ACE/TCM/CORP/.....)
	NSEL	(Membership No.: 12400)	

MULTIGAIN COMMODITIES SERVICES PVT LTD
SURVEILLANCE POLICY
(As approved by its Directors on 15 May 2013)

INTRODUCTION:

the trading members to frame the a surveillance policy for effective monitoring of Trading Members and monitoring the alerts based on trading activity on the Exchange. Trading members are directed to have proper mechanisms and to ensure that proper checks and balances are in control, and Multigain Commodities Services Pvt Ltd (The Company) is framing this policy accordingly.

SCOPE:

The Company shall implement the following policy:-

1) Transactional Alerts to be provided by the exchange:

In order to facilitate effective surveillance mechanisms, the Firm would download the below mentioned alerts based on the trading activities on the exchanges.

Sr. No.	Transactional Alerts	Segment
1	Significantly increase in client activity	Derivative
2	Sudden trading activity in dormant account	Derivative
3	Client / Group of Client(s) Concentration in a scrip	Derivative
4	Circular Trading	Derivative
5	Pump and Dump	Derivative
6	Wash Sales	Derivative

7	Reversal of Trades	Derivative
8	Front Running	Derivative
9	High Turnover Concentration	Derivative
10	Order Book Spoofing i.e. large orders away from market	Derivative

The Firm may formulate its own alerts in addition to above mentioned type of alerts.

2) Clients Information:

The Company will carry out the Due Diligence of its client(s) on a yearly basis. Further, Multigain Commodities Services Pvt Ltd shall ensure that key KYC parameters are updated on a yearly basis and latest information of the client is updated in Unique Client Code (UCC) database of the Exchange. Based on this information the Company shall establish groups / association amongst clients to identify multiple accounts / common account / group of clients.

3) Analysis:

In order to analyze the trading activity of the Client(s) / Group of Client(s) or scrips identified based on above alerts, Multigain commodities Services Pvt Ltd will carry out the following procedure:

- a. To seek explanation from such identified Client(s) / Group of Client(s) for entering into such transactions.
- b. To Seek documentary evidence such as bank statement / demat transaction statement or any other documents as below:
 - a. 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

commodities, demat account statements of the Client(s) / Group of Client(s) from which commodities pay-in has been met, to be sought.

- b. The period for such statements may be at least 15 days from the date of transactions to verify whether the funds / commodities for the settlement of such trades actually belongs to the client for whom the trades were transacted.

- c. The Company shall review the alerts based upon:
 - a. Type of the alerts downloaded by the exchange
 - b. Financial details of the clients
 - c. Past Trading pattern of the clients/ client group
 - d. Bank /Demat transaction details
 - e. Other connected clients in UCC (common email/mobile number/address, other linkages, etc)
 - f. Other publicly available information.

- d. After analyzing the documentary evidences, including the bank / demat statement, the Firm will record its observations for such identified transactions or Client(s) / Group of Client(s). In case adverse observations are recorded, the Compliance Officer shall report all such instances to the Exchange within 45 days of the alert generation. The Firm may seek extension of the time period from the Exchange, wherever required.

4) Monitoring and reporting:

For effective monitoring, the Company;

- 1. Within 30 days of alert generation shall dispose off the alert, and any delay in disposition, reason for the same shall be documented.

2. In case of any Suspicious or any Manipulative activity is identified, the same will be mentioned in the Register to be maintained for the purpose and will be reported to the Stock Exchanges within 45 days of the alert generation.
 - a. The Company shall prepare quarterly MIS and shall put to the Directors 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 shall be taken. Also, the Board 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. Compliance Officer would be responsible for all surveillance activities carried out by the Company and for the record maintenance and reporting of such activities.
 - b. Internal auditor of the Company shall review the surveillance policy, its implementation, effectiveness and review the alerts generated during the period of audit. Internal auditor shall record the observations with respect to the same in their report.