

# Surveillance policy

## Dhyan Stock Broking Pvt Ltd. (DSBPL)

### Surveillance Actions:

- i) Refusal of order for penny stocks / illiquid contracts:

DSBPL may refuse or restrict a client in placing the order in certain securities depending on various conditions like volume / value / part of illiquid scrip's / Z group of securities although a client may have credit balance or sufficient margin in the trading account. List of such scrip's will be reviewed on a periodical basis and will be updated on DSBPL website. However DSBPL under exceptional circumstances may execute clientele order. DSBPL has the discretion to reject execution of such orders based on its risk perception.

In case of F & O segment, all the far Month Option contracts and third Month Option Contract (Except Nifty) will not have buy and sell limit due to its illiquid nature, However in all above cases if client still wish to trade then the client needs to coordinate with the respective branch and the limit will be set by Head Office after analyzing the requirement.

- ii) Regulatory conditions under which a client may not be allowed to take further position or DSBPL may close the existing position of the client:

In case overall position in a scrip / derivatives contract has reached the Regulators prescribed Exchange limit / Market wide open interest limit / Client level limit, then client may not be allowed to take further positions, till such time Regulators prescribed limit comes down to create a new position.

Further DSBPL may close the existing position of a client to the extent of debit balances to release the margin from the Exchange. In case if DSBPL has sufficient margin cover on behalf of its clients, it may still decide based on the market conditions and risk perception not to allow further position or may close the existing position of a client.

- iii) PMLA Guidelines:

Client will be categorized as High, Medium and Low risk customer as per their risk appetite and their current profile as mentioned in Know your client form (KYC). The same will be reviewed at regular intervals.

Exposure to client may also be governed by customer profiling mentioned above as well as clients financial income made available to DSBPL from time to time. Client needs to furnish their income details on yearly basis. Following documents will be accepted as an income proof

- Copy of ITR Acknowledgement
- Copy of Annual Accounts
- Copy of Form 16 in case of salary income
- Net worth certificate
- Salary Slip
- Bank account statement for last 6 months
- Copy of demat account Holding statement.

- Any other relevant documents substantiating ownership of assets.

If there is a major disparity between financial details and trading volumes, client will be asked to furnish suitable explanation and based on the same further trading limits will be sanctioned.

iv) Suspension of Clients:

DSBPL may withhold the payout of client and suspend his trading account due to any internal surveillance (if client indulges into manipulative trade practice) / regulatory orders (debarring orders) /if the client is dormant (not traded > 12 months).

\*Detailed dormant account policy is separately prepared and is available in client login

**Communication**

Client can view details of his ledger, margin, shortfall etc through his secured login on DSBPL website. The client has to be aware about his position, outstanding balance and Risk. DSBPL is under no legal obligation to send any separate communication but as a customer centric company we may take extra efforts generally to ensure that client is well informed about the Risk and the possible actions, which may follow. The communication would generally be through SMS / Email on registered contact details with DSBPL.

**Disclaimer**

DSBPL Management will have a discretion to alter/change any of Exposure limit , selling parameter defined in this policy on the basis of prevailing market conditions with or without prior intimation and can use their discretion to grant any kind of exemption/permission in case they deem fit on case to case basis