

## Surveillance Policy

---

### 1. Introduction

Wealth Street Financial Services Private Limited is committed to upholding the highest standards of market integrity and investor confidence.

In accordance with the regulatory framework laid down by the **Securities and Exchange Board of India (SEBI)** and recognized stock exchanges (NSE, BSE, MSEI), this Surveillance Policy outlines the internal mechanisms for **monitoring, detecting, preventing, investigating, and reporting** market misconduct and suspicious trading activity.

This document forms an integral part of the Company's compliance and risk management framework and is applicable to all employees, clients, and operations.

---

### 2. Objectives

The primary objectives of this Surveillance Policy are:

- To establish a structured and technology-driven surveillance system to detect potential instances of market abuse, manipulation, insider trading, and fraudulent practices.
  - To comply with all relevant SEBI and stock exchange circulars, notifications, and best practices.
  - To safeguard investor interests and maintain market integrity.
  - To define clear responsibilities and escalation procedures for handling surveillance alerts.
  - To ensure timely and accurate reporting of suspicious activities to regulators.
- 

### 3. Scope

This policy applies to:

- All business segments handled by Wealth Street, including Equity, Derivatives, Currency, and Commodities.
- All trading activities conducted through the Company's systems, including proprietary and client trades.
- All associated persons: employees, dealers, authorised persons, sub-brokers, franchisees, and business partners.

### **Wealthstreet Financial Services Private Limited**

*Formerly Known as Wealthstreet Advisors Private Limited*

**CIN: U74999GJ2016PTC094432**

**Regd. Off** : A-1101, Mondeal Heights, 11th Floor, Besides Wide Angle, S.G Highway, Ahmedabad-380015

**P** : +91 79 66775500 • **E** : info@wealthstreet.in • **W** : www.wealthstreet.in

- All surveillance systems, trading platforms, and reporting tools used by the Company.

#### 4. Regulatory Framework

This policy is framed in line with the latest regulatory circulars and guidance issued by SEBI and exchanges, including but not limited to:

Reference	Title	Issued By	Date
ISD/MASTER CIR/July-2024/84680	SEBI Master Circular on Surveillance of Securities Market	SEBI	July 12, 2024
SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/114	Master Circular for Stock Brokers	SEBI	Aug 09, 2024
SEBI/HO/MIRSD/MIRSD-PoD-1/CIR/2024/91	Institutional Mechanism – Prevention and Detection of Fraud/Market Abuse	SEBI	July 04, 2024
INVG/65921	Exchange Circular on Transactional Alerts	NSE	April 2024
SEBI/HO/MIRSD/MIRSD-PoD-1/CIR/2025/XX	Framework for Monitoring and Supervision of System Audit	SEBI	2025

#### 5. Governance and Accountability

The surveillance framework at Wealth Street shall be governed by the following structure:

Level	Responsibility
<b>Board of Directors</b>	Oversight and approval of the Surveillance Policy; periodic review and guidance.
<b>Chief Compliance Officer (CCO)</b>	Overall responsibility for implementation, adherence, and reporting of surveillance activities.
<b>Surveillance Team / Compliance Department</b>	Daily monitoring of trading activity, handling of alerts, investigations, and maintenance of documentation.
<b>Dealers / Branch Staff</b>	First-level observation and escalation of suspicious activities.

### Wealthstreet Financial Services Private Limited

Formerly Known as Wealthstreet Advisors Private Limited

CIN: U74999GJ2016PTC094432

Regd. Off : A-1101, Mondeal Heights, 11th Floor, Besides Wide Angle, S.G Highway, Ahmedabad-380015

P : +91 79 66775500 • E : info@wealthstreet.in • W : www.wealthstreet.in

## 6. Surveillance Mechanisms

Wealth Street shall deploy a combination of **exchange-generated alerts** and **internally developed surveillance mechanisms**:

### A. Exchange/SEBI Transactional Alerts

- Sudden spike in trading volume or turnover.
- Concentrated activity in illiquid scrips.
- Dormant accounts becoming active.
- Abnormal order-to-trade ratios.
- Large deviations from historical trading patterns.

### B. Internal Surveillance Alerts

- Wash trades or self-trades.
- Circular trading among connected clients.
- Front-running indicators.
- Spoofing or layering activities.
- Insider trading behaviour patterns.

## 7. Alert Handling and Escalation Protocol

The Company shall adopt the following step-by-step process for alert handling:

Step	Action	Timeline
1	Alert Generation and Logging	Day of receipt
2	Preliminary Review by Surveillance Team	Within 2 working days
3	Client Contact and Explanation	Within 5 working days
4	Escalation to Compliance Officer if suspicious	Immediate upon red flag
5	Reporting to Exchange / SEBI (if required)	Within 7 working days
6	Documentation and Closure	Ongoing

## Wealthstreet Financial Services Private Limited

*Formerly Known as Wealthstreet Advisors Private Limited*

**CIN: U74999GJ2016PTC094432**

**Regd. Off :** A-1101, Mondeal Heights, 11th Floor, Besides Wide Angle, S.G Highway, Ahmedabad-380015

**P :** +91 79 66775500 • **E :** info@wealthstreet.in • **W :** www.wealthstreet.in

## 8. Reporting and Communication

- **Suspicious Transaction Reports (STR):** Submitted promptly to exchanges/SEBI in prescribed formats.
- **Periodic Reports:** Half-yearly and annual surveillance summaries submitted to exchanges.
- **Internal MIS:** Monthly reports to the Board summarizing alerts, findings, and actions taken.

## 9. Record Keeping

All records related to surveillance, including alerts, investigations, communications, and reports, shall be retained for a **minimum of 5 years** and made available during regulatory inspections.

---

## 10. Training and Awareness

- Mandatory annual training for dealers, compliance staff, and other relevant personnel.
  - Periodic workshops on new surveillance trends, SEBI circulars, and best practices.
- 

## 11. Review and Audit

- This policy will be **reviewed annually** or earlier upon issuance of new SEBI/exchange guidelines.
  - Internal audits and **system audits** (as per SEBI 2025 framework) shall evaluate the effectiveness of surveillance measures.
- 

## 12. Non-Compliance

Any non-compliance with this policy or regulatory requirements may result in disciplinary action and potential penalties under the SEBI Act, 1992, and relevant exchange bye-laws.

### **Wealthstreet Financial Services Private Limited**

*Formerly Known as Wealthstreet Advisors Private Limited*

**CIN: U74999GJ2016PTC094432**

**Regd. Off :** A-1101, Mondeal Heights, 11th Floor, Besides Wide Angle, S.G Highway, Ahmedabad-380015

**P :** +91 79 66775500 • **E :** info@wealthstreet.in • **W :** www.wealthstreet.in