SURVEILLANCE STANDARD OPERATING PROCEDURE

GOGIA CAPITAL GROWTH LIMITED

Gogia Capital Growth Limited – Depository Participant (NSDL) Effective Date: 13/02/2026
Approved By: Compliance Officer – *Bharti Rana*

1. Purpose

To define a clear, step-by-step procedure for surveillance activities undertaken by the DP in compliance with **NSDL Surveillance Framework**, **SEBI Master Circular**, and **PMLA/AML guidelines**. This SOP ensures timely alert generation, examination, disposal, documentation, and reporting.

2. Scope

Applicable to all surveillance activities related to:

- Demat account monitoring
- Off-market transfers
- Pledge/unpledge transactions
- KYC modifications
- Dormant/new account activity
- Alerts generated by NSDL/DP system
- Reporting to NSDL/SEBI

3. Definitions

- **Alert:** A system-generated or manually identified event requiring examination.
- **Disposal:** Closure of an alert with proper justification and documentation.
- **High-Risk Client:** As per AML/CFT risk categorization.
- **Dormant Account:** No activity for 12 months or more.

4. Roles & Responsibilities

4.1 Surveillance Team

- Daily monitoring of alerts
- Conducting verification and documentation
- Escalating suspicious cases

4.2 Compliance Officer

- Reviewing and approving alert disposals
- Reporting suspicious cases to NSDL/SEBI
- Ensuring adherence to timelines
- Conducting periodic audits

4.3 Operations Team

- Supporting KYC verification
- Providing client documents
- Executing corrective actions

5. Surveillance Process Flow (SOP)

Below is the **step-by-step operational SOP** for surveillance activities.

01. **Generate Daily Surveillance Alerts**

System generates alerts based on NSDL themes such as off-market transfers, KYC changes, dormant accounts, pledge/unpledge, and common demographic details.

02. **Review and Categorize Alerts**

Surveillance team reviews each alert and categorizes it as routine, moderate-risk, or high-risk based on client profile and transaction nature.

03. **Conduct Verification and Analysis**

Verify client details, transaction patterns, supporting documents, and cross-check with KYC/UBO records to assess legitimacy.

04. **Prepare Alert Examination Note**

Document findings, attach evidence, and prepare a disposal note with justification for closure or escalation.

05. **Compliance Officer Approval**

Compliance Officer reviews disposal notes, approves closure, or escalates suspicious alerts to NSDL/SEBI immediately.

06. **Maintain Audit Trail and Records**

Store all alerts, examination notes, approvals, and supporting documents for a minimum of 8 years as per NSDL guidelines.

07. **Submit Quarterly Surveillance Report**

Compile and submit alert generation and disposal summary to NSDL within prescribed timelines; ensure accuracy and completeness.

6. Detailed SOP Steps (Expanded)

6.1 Alert Generation

- Alerts generated daily/weekly/monthly based on NSDL parameters.
- Manual alerts may be created by Surveillance Team if unusual activity is noticed.
- No alert shall be suppressed or ignored.

6.2 Alert Review & Categorization

Each alert must be categorized:

Category	Description
Routine	Minor deviations; no risk indicators
Moderate-Risk	Activity inconsistent with client profile
High-Risk	Suspicious patterns; repeated KYC changes; large off-market transfers

High-risk alerts must be escalated immediately.

6.3 Verification & Analysis

For each alert:

- Check **client KYC**, **UBO**, **risk category**
- Review **transaction history**
- Validate **reason codes** for off-market transfers
- Confirm **email/mobile/address changes**
- Check **pledge/unpledge patterns**
- Review **dormant account activation**
- Document findings with evidence

6.4 Disposal Note Preparation

Each disposal note must include:

- Alert ID
- Nature of alert
- Verification steps taken
- Client communication (if any)
- Supporting documents
- Final justification
- Risk assessment
- Recommendation (Close / Escalate)

6.5 Compliance Officer Approval

Compliance Officer must:

- Review disposal notes
- Approve closure or escalate
- Ensure timelines (45 days max for disposal)
- Report suspicious cases to NSDL/SEBI immediately

6.6 Record Keeping

Maintain:

- Alerts generated
- Alerts examined
- Alerts disposed
- Supporting documents
- Audit trails
- Quarterly reports Retention: **Minimum 8 years**.

6.7 Quarterly Reporting

- Prepare consolidated report of alerts generated & disposed
- Submit to NSDL within prescribed timelines
- Ensure no "Nil" reporting unless justified
- Maintain internal MIS for management review

7. Escalation Matrix

Level	Escalation To	Trigger
Level 1	Surveillance Team Lead	Routine alerts requiring clarification
Level 2	Compliance Officer	Moderate-risk alerts

Level	Escalation To	Trigger
Level 3	NSDL / SEBI	High-risk or suspicious alerts

8. Internal Audit Requirements

- Quarterly internal audit of surveillance activities
- Review of alert disposal quality
- Verification of timelines
- Random sampling of alerts
- Reporting deviations to management

9. Policy & SOP Review

- Annual review or earlier if regulatory updates occur
- Compliance Officer responsible for amendments

Policy last reviewed on: 13/02/2026

For Gogia Capital Growth Limited
Sd/-
Bharti Rana