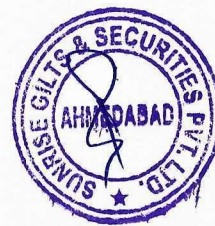


SUNRISE GILTS & SECURITIES PVT. LTD.

AUDIT TRAIL POLICY

(EFFECTIVE DATE: 10/06/2025)



Author:	PRATIK KUMAR MORE
Owner:	PRATIK KUMAR MORE
Approved by:	BOARD OF DIRECTORS
Organization:	SUNRISE GILTS & SECURITIES PRIVATE LIMITED
Version No:	1.1
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Effective Date:	10/06/2025

Document Control

Document Title **Audit Trial Policy**

Version History

Version No.	Version Date	Author	Summary of Changes
1.1	10/06/2025	PRATIK KUMAR MORE	Review and Approval of BOD

Approvals:

Name	Title	Approval Date	Version No
PRATIK KUMAR MORE	Audit Trial Policy	28/05/2025	1.1



1. Purpose:

The purpose of this Audit Trail Policy is to establish a structured and controlled mechanism for recording, monitoring and reviewing all system and application-level activities in order to ensure:

- Individual accountability of users
- Traceability of all trading and system activities
- Integrity and security of information systems
- Compliance with SEBI, Stock Exchange and regulatory requirements

2. Scope:

This policy applies to:

- All proprietary trading systems of the Company
- Dealer terminals and back-office systems
- IT infrastructure including servers, databases, networks
- All employees, directors, dealers, IT administrators and authorized users

3. Applicability:

Sunrise Gilts & Securities Pvt. Ltd. is engaged in **Proprietary Trading only** and does not handle any client accounts.

Accordingly, this policy applies exclusively to **internal users and proprietary transactions**.

4. Audit Trail Mechanism:

Audit trails are maintained for:

- System level activities
- Application level activities
- User access and authentication
- Trading operations

Series of records are maintained about computers, system events, operating systems, updates, and user activities.

5. User Access & Authentication:

- Each computer is installed with a unique username and password.
- Shared user IDs are strictly prohibited.



- All user access is authenticated and logged.
- Any attempt to circumvent security controls is immediately detected and reported to Management.

6. System & Network Monitoring:

- All systems are monitored daily by the IT Administrator.
- Essential applications such as ODIN, operating systems, internet and LAN are checked for proper functioning.
- Each system is assigned a dedicated IP address and network usage is monitored for unusual activity.

7. Data & Application Controls:

- Common document databases are segregated division-wise and password protected.
- Sensitive server applications are accessible only to authorized personnel.
- Antivirus and security tools are installed on all systems and maintain logs of detected threats.

8. Video & Physical Monitoring:

- CCTV cameras are installed across divisions for visual audit trail.
- Unusual activities are recorded and maintained for review.

9. Backup & Retention:

- System and application logs are backed up regularly.
- Critical data backups are maintained both onsite and offsite.
- Audit logs shall be retained for a minimum period of **5 years** or as prescribed by regulators, whichever is higher.

10. Access to Audit Logs:

Access to audit trail records is restricted to:

- IT System Administrator
- Directors
- Internal / Statutory / System Auditors
- Regulators, if required

No user is permitted to modify or delete audit logs.



11. Review & Monitoring:

- Audit trail logs are reviewed periodically by IT Administrator.
- Any abnormal activity, misuse or security breach is escalated to Management.
- Audit trail data is used for system improvement and security strengthening.

12. Incident Investigation:

All system issues, security incidents or suspected misuse are investigated using audit trail logs and records.

Events are reconstructed and corrective measures are implemented.

13. Policy Review:

This policy shall be reviewed annually or upon regulatory or system changes.

15. Approval:

This policy is approved by the Directors of Sunrise Gilts & Securities Pvt. Ltd.

