



## ***SUNRISE GILTS & SECURITIES PVT. LTD.***

### **AUDIT TRAIL POLICY**

(EFFECTIVE DATE: 10/06/2025)



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<b>Approved by:</b>	BOARD OF DIRECTORS
<b>Organization:</b>	SUNRISE GILTS & SECURITIES PRIVATE LIMITED
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#### 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.

