

SUNRISE GILTS & SECURITIES PVT. LTD.

INCIDENT MANAGEMENT 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
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Document Control

Document Title **Incident Management 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	Incident Management Policy	28/05/2025	1.1



INCIDENT MANAGEMENT POLICY

1. Purpose:

The purpose of this policy is to establish a structured framework for **identification, reporting, investigation, response and resolution of information security and operational incidents**, in order to:

- Minimize business impact
- Protect information assets
- Ensure continuity of operations
- Comply with regulatory requirements

2. Scope:

This policy applies to:

- All employees, directors, dealers and IT administrators
- All proprietary trading systems
- Servers, networks, applications and databases
- All operational and IT-related incidents

3. Applicability:

Sunrise Gilts & Securities Pvt. Ltd. is engaged only in **Proprietary Trading** and does not deal with client data.

Accordingly, this policy applies to **internal systems and operations only**.

4. Definition of Incident:

An incident includes any event that may result in:

- System failure
- Data loss or corruption
- Cyber security breach
- Unauthorized access
- Trading system disruption
- Malware or ransomware attack



5. Types of Incidents:

Type	Examples
IT Incident	Server crash, network failure
Security Incident	Hacking, virus, phishing
Trading Incident	Order execution failure
Data Incident	Data deletion, corruption

6. Incident Reporting:

All employees shall:

- Immediately report any incident to IT Administrator / Director
- Not attempt to hide or resolve critical incidents independently

Incidents shall be recorded in an **Incident Register** maintained by the IT Administrator.

7. Roles & Responsibilities:

Role	Responsibility
Policy Owner	Director
Incident Handler	IT Administrator
Final Authority	Director

8. Incident Response Process:

1. Identification
2. Reporting
3. Containment
4. Investigation
5. Recovery
6. Root Cause Analysis
7. Closure & Documentation

9. Escalation & Regulatory Reporting:

Serious incidents shall be:

- Escalated to Director / Management
- Reported to regulators / exchanges, if required



- Documented for audit and inspection

10. Incident Log & Records:

All incidents shall be recorded with:

- Date & time
- Nature of incident
- Impact
- Action taken
- Closure date

Records shall be retained for **minimum 5 years**.

11. Review & Improvement:

Incident data shall be reviewed periodically to:

- Identify patterns
- Improve controls
- Prevent recurrence

12. Policy Review:

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

13. Approval:

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

