

SUNRISE GILTS & SECURITIES PVT. LTD.

OUTSOURCING POLICY

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Author:	PRATIK KUMAR MORE
Owner:	PRATIK KUMAR MORE
Approved by:	BOARD OF DIRECTORS
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Document Control

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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	Outsourcing Policy	28/05/2025	1.1



OUTSOURCING POLICY

1. Background:

SEBI has issued guidelines for outsourcing of activities by intermediaries, requiring stock brokers to ensure that outsourcing does not diminish their obligations and responsibilities towards regulatory compliance, data security, and operational control.

Sunrise Gilts & Securities Pvt. Ltd. recognizes that outsourcing may be required for certain support functions, however, the Company remains fully responsible for all outsourced activities.

2. Objective of the Policy:

The objective of this policy is to:

- Define activities that may be outsourced.
- Ensure regulatory compliance and risk management.
- Protect confidentiality and data security.
- Ensure accountability and control over outsourced service providers.

3. Applicability:

This policy applies to:

- All outsourcing arrangements entered by the Company.
- All directors, officers, employees.
- All third-party service providers.

This policy is applicable to **Proprietary Trading operations only**.

4. Activities That May Be Outsourced:

The Company may outsource **non-core support activities**, such as:

- IT infrastructure support and maintenance



- Hardware AMC
- Software maintenance
- Internet and network services
- Data center hosting
- System audit services
- HR, payroll, accounting support
- Security services

5. Activities That Shall NOT Be Outsourced:

The following **core functions shall not be outsourced:**

- Trading decisions
- Order execution
- Risk management
- Compliance function
- Surveillance and monitoring
- Reporting to Exchanges / SEBI

These shall remain under direct control of the Company.

6. Due Diligence of Service Providers:

Before outsourcing, the Company shall ensure:

- Background verification of service provider.
- Financial and technical capability.
- Past experience and reputation.
- Data security practices.

7. Contractual Obligations:



All outsourcing arrangements shall be governed by a written agreement which shall include:

- Scope of services.
- Confidentiality clause.
- Data protection obligations.
- Right of audit by the Company / regulators.
- Termination clause.
- Liability and indemnity.

8. Confidentiality and Data Security:

The service provider shall:

- Maintain strict confidentiality of Company data.
- Not disclose any information to third parties.
- Implement adequate cybersecurity controls.
- Return / destroy data upon termination.

9. Monitoring and Control:

The Company shall:

- Periodically review performance of service providers.
- Monitor service levels.
- Ensure compliance with regulatory requirements.
- Maintain ultimate accountability.

10. Business Continuity:

The Company shall ensure:

- Backup arrangements.
- Alternate vendors if required.



- No disruption to critical operations.

11. Reporting to Regulators:

The Company shall provide information to Exchanges / SEBI regarding outsourced activities whenever required.

12. Policy Review:

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

13. Approval:

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

