

Vardhaman Capital Pvt.Ltd.

EVENT LOGGING AND MONITORING PROCEDURE

Policy created by	Designated Officer
Policy reviewed by	Technology Committee
Policy reviewed on	31-12-2024
Policy Approved by	Board of Directors
Policy approved on	04-01-2025

Version – 1.0

Scope

This procedure applies to all IT systems, network devices, applications, security devices, and users which generate logs for operational, security, or compliance purposes. Covers all production and regulatory systems used by the Stock Broker and Depository Participant including servers, routers, terminals, and databases.

Procedure Description

Log Sources

- Enable logging on all endpoints, servers, trading applications, and DP back-office systems.

Log Content

- Capture access logs, transaction logs, privilege escalations, system errors, and security events (AV alerts, intrusion attempts).

Time Sync

- All systems must be synchronized using NTP to maintain log integrity.

Log Aggregation

- Logs to be pushed to a centralized SIEM system with real-time monitoring capability.

Access Controls

- Only authorized personnel should access logs. Logs should be write-protected and tamper-evident.

Retention & Backup

- Logs to be retained for 2 years as per SEBI guidelines, stored in read-only media.
- Archived logs must be encrypted and backup stored offsite.

Alerts & Monitoring

- Critical events must trigger real-time alerts and escalation to CISO and Compliance Officer within 24 hours.
- Weekly manual review and monthly reporting to be done.

Exceptions

- Must be documented with justification and signed by Head of Compliance.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff / Employees /and Directors of the Company.

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CISO :- Anup Kumar Khandelwal

Dated: - 04-01-2025