Vardhaman Capital Pvt.Ltd.

TECHNICAL GLITCHES POLICY

Circular: - Ref. SEBI/HO/MIRSD/TPD-1/P/CIR/2022/160 dated November 25, 2022

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

Objective

To establish a comprehensive framework for addressing and mitigating technical glitches in electronic trading systems, ensuring investor protection and market integrity.

Definition of Technical Glitch

A technical glitch refers to any malfunction in the stockbroker's systems, including hardware, software, networks, processes, or services provided electronically. This malfunction may lead to stoppage, slowing down, or variance in normal system functions for a contiguous period of five minutes or more.

Reporting Requirements

- We will inform the respective stock exchanges about any technical glitch, not later than one hour from the time of occurrence.
- Submission of a Preliminary Incident Report to the Exchange within T+1 day of the incident, including details of the incident, its impact, and immediate actions taken.
- Submission of a Root Cause Analysis (RCA) Report to the stock exchange within 14 days, covering the incident's cause, duration, impact analysis, and corrective/preventive measures. The RCA report, for all technical glitch incidents greater than 45 minutes, an independent auditor's report on the RCA shall be submitted within 45 days of the incident.

Capacity Planning

- We will conduct regular capacity planning for their trading infrastructure, including servers, network availability, and trading applications.
- Monitoring peak load with installed capacity at least 1.5 times the observed peak load.
- Deploying mechanisms to receive alerts on capacity utilization beyond 70% of installed capacity.

Software Testing and Change Management

- Rigorous testing of all software changes before deployment.
- Creation of test-driven environments, automated testing, and a traceability matrix between functionalities and unit tests.
- Implementation of a change management process to prevent unplanned and unauthorized changes.

Monitoring Mechanism

- Establishment of an API-based Logging and Monitoring Mechanism (LAMA) between stock exchanges and stock brokers' trading systems.
- Real-time or near-real-time monitoring of key parameters by both stock brokers and stock exchanges.
- We ensure to preserve the logs of the key parameters for a period of 30 days in normal course. However, if a technical glitch takes place, the data related to the glitch, shall be maintained for a period of 2 years.

Business Continuity Planning (BCP) and Disaster Recovery Site (DRS)

- Mandatory establishment of BCP-DR set up for stockbrokers with a specified client base i.e. 'Specified Members'.
- Periodic review of BCP-DR policy outlining standard operating procedures.
- Conducting DR drills/live trading from DR site, ensuring full redundancy and ISO certification.

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.

Vardhaman Capital Pvt.Ltd.

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CISO

Dated: - 04-01-2025