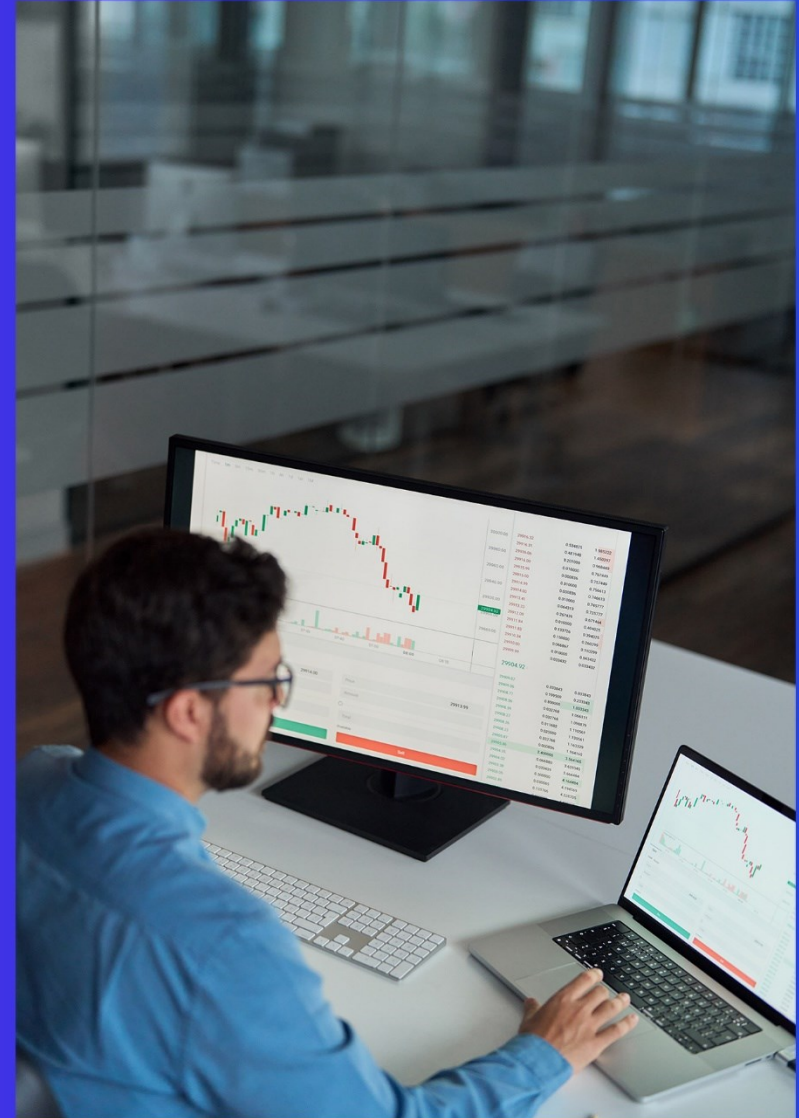




KPMG Trading Compliance Manager

kpmg.com/in



KPMG Trading Compliance Manager

KPMG Trading Compliance Manager is an in-house web-based tool for automating reporting, approvals, disclosures relating to company securities; whilst maintaining a digital database and strengthening internal controls with respect to Prevention of Insider Trading PIT.

Key features

- Framework for submission, tracking and archival of all trade requests requiring pre-approval
- Regular alerts to analyse, identify and escalate potential threats
- Interactive and customizable dashboards
- MIS reports
- BENPOS Reconciliation
- Repository for details of parties with whom UPSI has been shared – time stamped with an audit trail

Potential benefits

- Easy analysis, identification and escalation of potential threats through this tech-enabled solution with automated workflows
- Intelligent monitoring of insider trades



Fortifying Digital Compliance



Note:

- The application will be hosted at client environment
- IT infrastructure to be provided by client based on technical stack requirement including procurement of any license(s)

Overview of Structured Digital Database

KPMG Trading Compliance Manager is equipped with an automated digital solution in order to comply with SEBI's guidelines under PIT Regulations for maintenance of a non-tamperable Structured Digital Database with audit trail and time stamps

Features

- Tamperproof Structured Digital Database with date and time stamp
- Captures name of the person/entity who have shared UPSI and with whom UPSI has been shared
- Capture PAN, and Email ID of the persons who are in possession of UPSI
- Intimation via email to the person who is sharing UPSI of the record being created in the database
- Maintain the audit trails of UPSI flow from the person sharing UPSI till the last recipient
- Record whether Confidentiality Notice has been provided to UPSI Recipient
- Export database logs in excel for MIS and audit reporting
- Data is hosted on client server

User Access

Sub-Admin

- Access provided to Sub-Admin(s) only
- Each Sub-Admin can view respective records created by them
- Restricted view reports generated for the respective Sub-Admin(s)

Compliance Officer

- Access provided to Compliance Officer to view/download all the records entered into the Structured Digital Database by all the Sub-Admin(s).
- Exhaustive report capturing the following details such as the name, PAN, email of the person who has shared the USPI and the person with whom such UPSI is shared, nature of UPSI, date when such UPSI is shared, etc.

User Roles

Employee

The employee can enter details of their immediate relatives and submit one-time disclosures. They can also obtain pre-clearance from the Compliance Officer and report their transactions through the tool.



Admin

The admin can on-board employees on the tool, add user details, enter BENPOS details and send out bulk emails to the users.



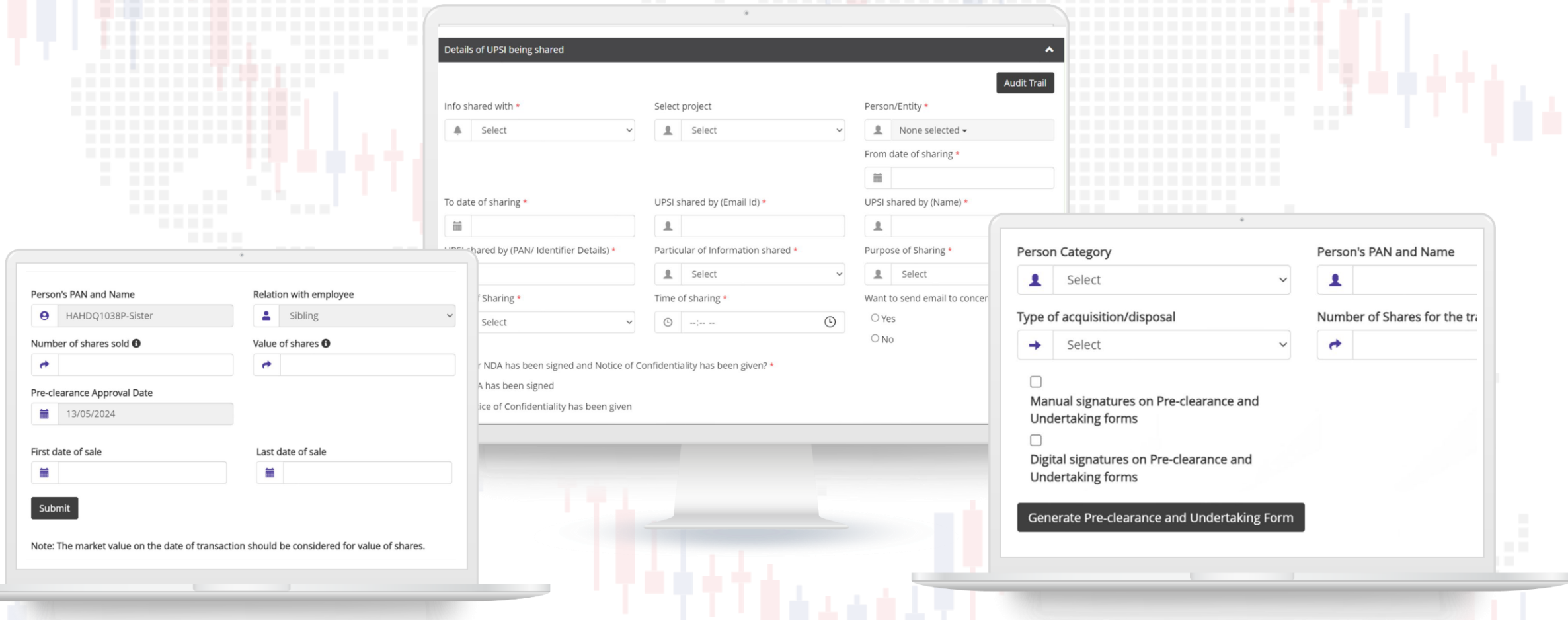
Compliance Officer

The Compliance Officer can approve or reject requests made by employees for pre-clearance of trades and download various user reports for all data entered by the user in the tool.

Sub-Admin

The sub-admin can enter the details with whom UPSI is shared for a legitimate purpose in the Digital Database.

Snapshots from KPMG Trading Compliance Manager



Assumptions and Scope Considerations



General

- KPMG Trading Compliance Manager supports English language only
- Pre-requisites including hardware / software setup must be made available by client before the implementation starts
- Company to timely provide all necessary documents and clarifications on business requirements



Management responsibilities

- Company's IT team will be responsible for ensuring compliance with prevalent licensing agreements that the organization has with both software product and hardware infrastructure original equipment manufacturers
- Be responsible for the definition and execution of its business processes including but not limited to application and data security policies
- Company will provide infrastructure in case of on-site deployment of the product



Scope exclusions

- We will not procure or evaluate any hardware or software as part of this engagement. This engagement does not consider any hardware, software licenses or infrastructure costs.



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