

POLICY FRAMEWORK FOR VOLUNTARY FREEZING / BLOCKING ONLINE ACCESS OF TRADING ACCOUNT FOR CLIENTS

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Policy approved by:	Board of Directors
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INTRODUCTION

In order to enhance the ease of doing business and ease of doing investments for investors and to enhance protection of investors from suspicious activities; SEBI, has vide its circular ref. no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 has mandated that a framework shall be laid down by stock exchanges for Members to provide the facility of voluntary freezing / blocking the online access of the trading account to their clients. Accordingly, stock exchanges has issued circulars providing a framework for trading members for the facility of voluntary freezing/blocking the online access of the trading account for clients. In accordance with the above, Members are required to frame a policy in line with the exchange prescribed framework, which shall be part of the member's Risk Management Policy and shall be displayed on its website along with the process and mode(s) through which the client can place the request to freeze / block & unfreeze / unblock the trading account along with the timelines that will be followed by the members for the same.

SCOPE AND APPLICABILITY

Members providing internet based trading / mobile trading / other online access for trading are required to make available to the clients at least two modes of the following communications through which the client may request for voluntary freezing / blocking the online access of trading account if any suspicious activity is observed in the trading account: -

- a) Email from registered e-mail ID
- b) SMS from registered mobile number
- c) IVR / tele calling
- d) Chatbot
- e) Trading Member's App / website
- f) Any other legally verifiable mechanism

The policy shall be applicable with effect from July 01, 2024.

1. To new on-boarded clients as part of account opening kit
2. To all existing clients via email or any other suitable mechanism which can be preserved. In case, communication gets bounced / undelivered, the same shall be communicated through alternate channels to such clients. Other suitable mechanism may include physical delivery / SMS / electronic instant messaging services after adhering with the safeguards prescribed on Issuance of Electronic Contract Notes (ECN) through SMS / electronic instant messaging services.

MODE OF RECEIPT OF REQUEST FOR FREEZING / BLOCKING THE TRADING A/C

Following modes shall be provided by company for receipt of request for freezing / blocking the clients trading A/c:

1. Online Request through website

PROCEDURE TO BE FOLLOWED ON RECEIPT OF REQUEST FOR FREEZING / BLOCKING THE TRADING A/C.

On receipt of request from clients through any of the prescribed modes of communications; for freezing / blocking of the online access of the trading account from the client:

1. We shall validate that the request is received from a registered client as per and issue an acknowledgement as well as freeze / block the online access of the client's trading account and simultaneously cancel all the pending orders of the said client.
2. To validate the request received on calling desk; we shall verify the client by authenticating that request is received from registered number

The timelines for freezing / blocking of the online access of the clients' trading account is as under:

Scenario Timelines for issuing acknowledgement as well as freezing / blocking of online access of trading account.

Scenario	Timelines for issuing acknowledgement as well as freezing / blocking of the online access of the trading account.
Request received during the trading hours ¹ and within 15 minutes before the start of trading.	Within 15 minutes *
Request received after the trading hours and 15 minutes before the start of trading.	Before the start of next trading session

Trading hours shall be as follows: Capital Market Segment: 9.15 a.m. to 3.30 p.m., Equity Derivatives Segment: 9.15 a.m. to 3.30 p.m., Currency Derivatives Segment: 09.00a.m. to 05.00 p.m., Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.

** To begin with, the time limit of 15 minutes is being specified for the purpose of issuing acknowledgement as well as freezing/blocking of the online access of the trading account. This time limit shall be contracted after a review in next six months after the date of its applicability to enhance protection of investors from suspicious activities.*

- d. Post freezing/blocking client's trading account, we shall send a communication on the registered mobile number and registered e mail ID of the client, stating that online access to the trading account has been frozen/blocked and all pending orders in the client's trading account, if any, have been cancelled along with the process of re enablement for getting the online access to the trading account.
- e. We shall also communicate / provide the details of open positions of client (if any) along with contract expiry information within one hour from the freezing/blocking of the trading account.
- f. We shall maintain the appropriate records / logs including, but not limited to, request received to freeze/block the online access of trading account, confirmation given for freezing / blocking of the online access of the trading account and cancellation of pending orders, if any, sent to the clients.
- g. In case of failure in freezing / blocking the online access within the prescribed timelines, there is a risk that we may be held responsible for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.

RE-ENABLING THE CLIENT FOR ONLINE ACCESS OF THE TRADING ACCOUNT

We shall re enable the online access of trading account after carrying out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account.

IMPORTANT POINTS

1. All logs of freeze and unfreeze request and communications sent shall be maintained for audit trail.
2. Freezing/blocking is only for the online access to the client's trading account, and there shall be no restrictions on the Risk Management activities.
3. The request for freezing / blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.

RECORD MAINTENANCE

1. We shall maintain a verifiable record of communication of this policy to all existing clients and obtain a confirmation of providing a copy of this policy from all new on boarded clients with effect from July 1, 2024.
2. We shall maintain a verifiable record of all such requests received for freezing / blocking of online access to trading account received from clients as per record management guidelines prescribed by the exchanges / regulator.
3. Internal auditor shall review the policy, its implementation, effectiveness and shall record the observations with respect to the same in their report. This policy would be made available to the internal auditors and regulators during the course of audits or as and when demanded.

REVIEW OF POLICY

The directives issued by regulators would be adopted by the entity from time to time, but the same would be incorporated in this policy during its review. In view of which, this policy document would be subject to review on a periodical basis, viz., annually and / or in case of any major regulatory directives.