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POLICY CONTROL

| Version: | 1.0 |
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Version Date: _____ (Date of Passing Board

Resolution)

Approved by: Board of Directors

Department in Charge:

Frequency of Review: Yearly or as and when any update comes

change in the Relevant Regulation comes

or any change in the Company's internal

control or Structure whichever is earlier.

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POLICY ON VOLUNTARY FREEZING/BLOCKING OF ONLINE TRADING ACCOUNT ACCESS

I. OBJECTIVE/PURPOSE:

This policy aims to provide clients with the option at their request to voluntarily freeze or block online access to their trading accounts, ensuring enhanced security and preventing unauthorized transactions.

II. APPLICABILITY:

This policy applies to all clients including Institutional Clients holding trading accounts with Broker who wish to voluntarily freeze their online trading accounts.

III. DEFINITIONS:

- Trading Member: An authorized member of the stock exchange providing trading services.
- o Client: An individual or entity holding a trading account with the trading member.
- Voluntary Freezing/Blocking: A process initiated by the client to temporarily suspend online access to their trading account.

IV. ELIGIBILITY:

All clients with active trading accounts are eligible to request voluntary freezing/blocking of their online access.

V. PROCESS FOR FREEZING/BLOCKING/REQUEST PROCEDURE:

> Initiation:

Clients can request freezing/blocking by two communication channels:

- Send an email from the registered email ID with the relevant details to
- Call on +91-22-_____ from the registered mobile number and provide the relevant details

> Verification:

Broker shall verify the client's identity using methods such as 2 factors authentication, security questions, or other verification methods.

> Acknowledgment:

Upon successful verification, the client shall be provided an acknowledgment of the request along with the expected timeframe for implementation.

VI. TYPES OF FREEZING OPTION:

- ➤ **Complete Freeze:** Blocks all online trading access (buy/sell).
- **Partial Freeze:** Blocks either buy or sell transaction.
- **Segment Freeze:** Freezing of specific segments (Equity, F&O, Commodity, Currency).
- ➤ **Time-bound Freeze:** Temporary freeze for a specified duration.

VII. IMPLMENTATION:

- ➤ **Freezing/Blocking:** The online access to the client's trading account shall be frozen/blocked within 24 hours of receiving the verified request.
- ➤ **Confirmation:** A confirmation notification shall be sent to the client once the online access has been successfully frozen/blocked.
- **Duration:** Clients may specify the duration for the freeze/block. If unspecified, the account remains frozen/blocked until a reactivation request is made.
- **Reactivation:** Clients can request reactivation by following the initial request procedure, including identity verification.

VIII. BROKERS RESPONSIBILITY:

- ➤ **Notification:** Inform clients about the availability and procedure of the voluntary freezing/blocking facility.
- **Support:** Assist clients in initiating and managing their requests.
- > **Security:** Ensure the freezing/blocking process is secure and protects clients' data and trading accounts from unauthorized access.

IX. CLIENT RESPONSIBILITY:

- ➤ **Accuracy:** Provide accurate and complete information when requesting the freezing/blocking of online access.
- ➤ **Timeliness:** Promptly inform Broker in case of any unauthorized activity or the need to reactivate the account.

X. REPORTING AND COMPLIANCE:

- ➤ **Record Keeping:** Maintain records of all requests and actions taken regarding freezing/blocking of online access.
- ➤ **Compliance**: Ensure adherence to all relevant regulatory requirements and guidelines.

XI. DISPUTE RESOLUTION:

➤ **Mechanism:** Establish a clear and accessible mechanism for resolving disputes related to the freezing/blocking of online access.

XII. CLARIFICATION/INFORMATION:

In case of any clarification/information required on the implementation of the Policy, please contact the Compliance Officer on Email -______, Tel No._____.

XIII. REVIEW:

The said policy shall be reviewed by the Board of the Directors on a yearly basis or as and when any update comes change in the Relevant Regulation/Circular comes or any change in the (Name of the Stock Broker)'s internal control or Structure. The Compliance officer has the authority to give direction to undertake additions, changes, and modifications, etc. to this Policy, and the same shall be effective per the authority of the Compliance Officer and thereafter be ratified by the Board of the Directors at its next review.

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