



Policy on voluntary freezing /unfreezing of online access of client's trading account

1. Background:

SEBI vide it's circular SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and Exchanges vide their circulars dated April 08, 2024 mandated trading members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities. The said circular also requires the trading members to frame a policy in line with the framework specified by the Exchanges, which shall be the part of the trading member's Risk Management Policy. The trading members shall disclose the said policy on their website. The said policy shall also form a part of the account opening kit for all new clients on boarded with effect from July 01, 2024.

2 Scope:

This policy shall be applicable to all the clients, who have obtained internet based trading/ mobile trading/ other online access for trading online. The facility of voluntary freezing/blocking (after verification by SSPL) the online access of the trading account is provided to their clients on account of suspicious activities.

3. Framework for voluntary freezing /unfreezing of online access of client's trading account:

a. Request for freezing :

Client may request for voluntary freezing / blocking the online access to their trading account through any one of the following modes that shall be made:

- i) **Email from registered e-mail ID:** The client can send email on email id stoptrade@samuraisec.co.in, from their registered email id with us, with request to voluntary freezing / blocking the online access of Trading Code.
- ii) **SMS from registered mobile number:** The client can send SMS on +91 72708 99091, from their registered mobile number with us, to voluntary freezing / blocking the online access of Trading Code

On receipt of for voluntary freezing / blocking the online access for particular client, SSPL shall send acknowledgment email and SMS, whichever is applicable to the respective client.

To check authenticity of request, Compliance Officer shall called up the client on his/her registered contact number and verify the details.

b. Freezing /blocking of online access:

- i) Once validation is done, freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the said client. 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 the online access of the trading account.
Request received during the trading hours (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	Within 15 minutes (To begin with, the time limit of 15 minutes is being specified for the purpose of issuing acknowledgement as

Derivatives Segment: 09.00 a.m. to 05.00 p.m., Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.) and within 15 minutes before the start of trading.	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)
Request received after the trading hours and 15 minutes before the start of trading.	Before the start of next trading session

- ii) Post freezing/blocking the client's trading account, SSPL shall send a communication on the registered mobile number and registered e-mail ID of the client, stating that the online access to the trading account has been frozen/blocked and all the 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.
- iii) Details of open positions (if any) should also be communicated to the client alongwith contract expiry information within one hour from the freezing/blocking of the trading account. This will eliminate the risk of unwanted delivery settlement. This time limit shall be contracted after a review in the next six months after the date of its applicability to enhance protection of investors from suspicious activities.

c) Unfreezing /Unblocking of online access:

Re-enabling the client for online access of the trading account: - The Trading Member 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.

4. Other compliances:

- a. In case of failure of SSPL in freezing/ blocking the online access within the prescribed timelines (15 minutes in case the request is received during the trading hours and within 15 minutes before the start of trading / Before the start of the next trading session in case the request is received after the trading hours and 15 minutes before the start of the trading), SSPL shall be responsible for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.
- b. SSPL 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. The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.