

# Asit C. Mehta

## INVESTMENT INTERMEDIATES LTD.

Corporate Member: BSE Ltd, National Stock Exchange of India Ltd.

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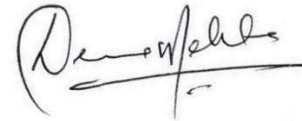
### POLICY ON "VOLUNTARY FREEZING/BLOCKING OF THE ONLINE TRADING ACCOUNT"

Sr. No.	Particulars	Person preparing/reviewing	Person Reviewing
1.	Policy prepared	Compliance Team	Jaideep Vaidya
2	Policy Checked by Processing Team	Risk Team & Head of Operations	Bhadresh Suthar Sameer Nalawade
3	Policy Approved	Managing Director	Deena A Mehta

**Policy Prepared by  
Compliance Officer**

**Surmeet Kaur Chandhok**

**Policy Approved by  
Managing Director**



**Deena A Mehta**

**Date: 30/04/2024**

**Place: Mumbai**

## **The facility of voluntary freezing/blocking the online access of the trading account to their clients**

### **1. Introduction**

This policy outlines the procedures for voluntary freezing/blocking of trading accounts for clients in accordance with SEBI & Exchange Circulars.

### **2. Notice/Circular Reference**

- SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024
- Exchange Circular no. NSE/INSP/60277 dated January 16, 2024 on the subject "Ease of Doing Investments by Investors - Facility of voluntary freezing/ blocking of Trading Accounts by Clients".

### **3. Scope and Applicability**

- This policy is applicable to all clients who wish to voluntarily freeze/block their online trading accounts on the account of suspicious activities.
- This is applicable & finalised by the SEBI & Brokers' Industry Standards Forum in consultation with the Exchanges.

### **4. Risk Management Consideration**

- The request by client for voluntary freezing/blocking of trading account shall be made through IVRS or web based application. Additional modes of request like email or chat-bot may be considered in subsequent phases or on a case to case basis. Email by client to be sent to [stoptrade@acm.co.in](mailto:stoptrade@acm.co.in).
- The request received will be sent to the risk team for freezing/blocking of the online access of the trading account for the client. (E-mail for the same is mandatory).
- The system will ask the client to check whether there are open positions and the client has to agree to close the same before his request for freezing/blocking is given effect to.
- Client has to cancel all pending orders at their end.
- Risk team will simultaneously check for any pending orders.
- Risk team will perform activity for freezing/blocking as per following timelines

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Scenario	Timelines for issuing acknowledgement as well as freezing / blocking of the online access of the trading account.
Request received during the trading hours <sup>1</sup> and within 15 minutes before the start of trading.	Within 15 minutes <sup>2</sup>
Request received after the trading hours and 15 minutes before the start of trading.	Before the start of next trading session

<sup>1</sup> 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: 09.00 a.m. to 05.00 p.m., Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.

<sup>2</sup> 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.

- Freezing/Blocking will be performed on BOW, Intellect & InvestmentZ within the stipulated time frame.
- Risk team will temporary "SUSPEND" client on all trading set-up's.
- Risk team reserves right to Square off /Close any open position even during the voluntary freeze/block period & the same is subject to case to case basis.
- Re-enabling/Unblocking/Unfreezing of Client codes at client request will be done only after doing due diligence as to liveliness check of client.

### 5. Clarification by SEBI quoted as below:

It is clarified that:

- a) 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 of the Trading Member.
- b) The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.

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