## POLICY ON FREEZING / BLOCKING CLIENT ACCOUNT



**1.** <u>Background:</u> SEBI vide circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and NSE Circular no NSE/INSP/61529 Dated April 08, 2024 regarding Framework for Trading Members to provide the facility of voluntary freezing/blocking of online access of the trading account to their clients.

It is pertinent to mention 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 the client's Unique Client Code (UCC) as inactive in the Exchange records
- 2. In view of the above the company has framed the following policy governing the outline of the modus operandi. In addition to branch trading the company is extending the facility of internet trading through browser based. Presently we will be providing the following method of communications through which the client may request for voluntary freezing/blocking of the online access of trading account if any suspicious activity is observed in the trading account. However, offline trading account of clients can also be blocked by following the below mentioned procedure.
  - a) E-mail from registered e-mail ID: A dedicated e-mail id stoptrade@fifl.co.in has been opened where client can send their request for freezing/ blocking from their e-mail id registered with us. Clients are requested to send their freezing/ blocking request without any ambiguity along with UCC. Similarly for un-freezing/ un-blocking, clients are requested to send their request at the e-mail id stoptrade@fifl.co.in from their registered e-mail id mentioning the same. Request sent for such freezing/ blocking and un-freezing/ un-blocking may not be addressed by the company if it is not sent from client's registered e-mail id or sent to any other e-mail id of the company.
  - b) <u>SMS from registered mobile number</u>: A dedicated mobile number +91 6289618224 has been assigned where client can send their request for freezing/ blocking from their mobile number registered with us. Clients are requested to send their freezing/ blocking request in the following manner:
    - For freezing/ blocking type: "BLOCK" FOLLOWED BY UCC WITHOUT SPACE Example: if your UCC is A111 then message will be "BLOCKA111" and send it to +91 6289618224.
    - For un-freezing/ un-blocking type: "UNBLOCK FOLLOWED BY UCC WITHOUT SPACE" Example: if your UCC is A111 then message will be "UNBLOCKA111" and send it to +91 6289618224.

Request sent for such freezing/ blocking and un-freezing/ un-blocking may not be addressed by the company if it is not sent from client's registered mobile number or sent to any other mobile number of the company.

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- **3.** The company shall take the following actions on the receipt of such request through any modes of communications for freezing/blocking of the online access of the trading account from the client:
  - Verify whether request is received from the registered mobile number/e-mail ID of the client;
  - Freeze / block the online access of the client's trading account and simultaneously cancel all the pending orders, if any, of the said client.
  - Issue the acknowledgement to the registered e-mail id or mobile number 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.
  - Details of open positions (if any) would also be communicated to registered e-mail id
    of the client along with contract expiry information within one hour from the
    freezing/blocking of the trading account.
  - 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 theonline access of the trading account.
Request received during the trading	Within 15 minutes of receiving therequest.
hours and within 15 minutes before the	
start of trading hour.	
Request received after the trading hours	Before the start of next trading session
and 15 minutes before the closure of	
trading hour.	

- **4.** The company shall maintain the appropriate records/logs including 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, and sent them to the clients for the time limit as prescribed by the Regulator.
- **5. 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.