

Policy on Providing the Facility of Voluntary Freezing/Blocking the Online Access of the Trading Account to Clients

Background:

SEBI vide Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and Exchange Circular no. NSE/INSP/60277 dated January 16, 2024 has issued circular on Facility of voluntary freezing/ blocking of Trading Accounts by Clients”.

As per the said circular trading members are supposed to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities.

Purpose:

The purpose of this Policy is to set out the process to achieve the objective as mentioned above. Major parameters of this Policy are mentioned below:

Mode of intimation by client for freezing/ blocking trading account

The client willing to freeze/block the on-line access of trading account on account of observance of any suspicious activity may request for voluntary freezing/ blocking the online access of trading account through following mode

1. Email from registered e-mail ID: stoptrade@jambuwala.com
2. SMS from Registered Mobile Number to Registered Mobile No: 9687654373

The request so received will be verified with our record and an acknowledgement will be issued to client post validation.

The online access of the trading account given to client will be frozen/blocked as also will 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 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: 09.00 a.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.

Communication post freezing/blocking on-line access of trading account

A communication will be sent 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 trading account, if any, have been cancelled.

Details of open positions (if any) will also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account.

Record Maintenance

Following records/log w.r.t. request received to freeze/block the online access of trading account be preserved for future use

confirmation given for freezing/blocking of the online access of the trading account and cancellation of pending orders, if any, sent to the clients.

Liability on the part of trading member in case of failure to freeze/block online access within time

In case of failure 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), we shall be responsible for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.

Process for re-enabling the client for online access of the trading account: -

Submission of duly signed application for online access re-enablement

Request for re-enablement through registered email id

Re-enablement of online access be done after carrying out necessary due diligence including validating the client request

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.

Effective Date

This policy is effective from 01/07/2024

Review and update

This policy shall be reviewed and updated on an annual basis or as and when there are any changes introduced by any statutory authority.

Review Date	Version	Comment	Authorised
July 2024	1.0	Policy Created	Mr. Kamal Shah
September 2024	1.1	Policy Updated	Mr. Kamal Shah
April 2025	1.2	Policy Updated	Mr. Kamal Shah
September 2025	1.3	Policy Updated	Mr. Kamal Shah
April 2026	1.4	Policy Updated	Mr. Kamal Shah

Policy Reviewed and Authorised by

Mr. Kamal Shah
 Director