

# Annexure to Risk Management Policy

Policy Framework for Voluntary Freezing/Blocking of Online Trading Account Access for Clients

Policy Version SSBL/VFTA/1.0 Policy date 28<sup>th</sup> May 2024

#### A. Introduction:

In an effort to enhance the ease of business operations and investment activities for investors, and to safeguard investors from suspicious activities, SEBI, through its circular ref. No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 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. Consequently, stock exchanges have issued circulars detailing this framework.

In line with these directives, the following policy has been formulated for the voluntary freezing/blocking of trading accounts.

This policy has also been updated on our website also for easy access to our clients.

## B. Applicability:

This policy shall be applicable as and when clients wants to freeze / block online access to their trading account and subsequently desires to unfreeze the same.

# C. Request for Freezing/Blocking of Online Trading Account

Clients can choose from the following options to freeze/block their trading account:

#### Option A: Email

Clients can send an email to a dedicated Email ID - <a href="stoptrade@sanbro.in">stoptrade@sanbro.in</a> from their registered email ID only with the Subject Line-"Freeze/Block Trading A/C <UCC CODE>", mention your UCC along with DOB & PAN. Upon receipt of the email, our team will validate the request.

# Option B: SMS

Clients can send an SMS on the Mobile No. 8356086634 from their registered number only. SMS Code – "STOP TRADE <UCC CODE>". Upon receiving the SMS, our team will validate the request. Note: Any of the above options can be used to freeze/block the trading account.

# D. Processing of Request for Freezing/Blocking of Online Trading Account

On receipt of request, our team shall validate the same to confirm genuineness of request. After validation, all **online internet based trading access** for the UCC shall be disabled and all pending orders shall be cancelled. Client shall still be able to access back office data from our website. Timelines for processing of Freezing/Blocking the Online Access

Scenario	Timelines for Issuing Acknowledgement and Freezing/Blocking
Request received during trading hours and within 15 minutes before the start of trading	Within 15 minutes
Request received after trading hours and 15 minutes before the start of the next trading session	Before the start of the next trading session

<sup>\*</sup>Trading Hours 9.15a.m to 3.30 p.m

# E. Process Flow

- 1. On receipt of such request, the online access of the client's trading account shall be freezed/blocked and simultaneously all the pending orders shall be cancelled.
- 2. Post freezing/blocking the client's trading account, a communication shall be sent on the registered e-mail ID of the client, stating that the online access to the trading account has been frozen/blocked. The communication shall also provide the details of all pending orders in the client's trading account, that have been cancelled along with the process of re-enablement for getting the online access to the trading account.
- 3. Details of open positions (if any) shall also be communicated to the client along with contract expiry information within such time as prescribed by regulators. This will eliminate the risk of unwanted delivery settlement.
- 4. Once the online access of the trading account is freezed / blocked such client may place orders through alternate channels such as call and trade.

## F. Procedure to Unfreeze/Unblock the Account

Clients wishing to unfreeze/unblock their account must send an email to <a href="mailto:stoptrade@sanbro.in">stoptrade@sanbro.in</a> from their registered email ID along with UCC details. Upon receipt of the email, the SSSBL team will contact the client to confirm the request. The account will be unfrozen only after the client confirms the request over the call.

## G. Clarifications

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

This policy shall be effective from July 01, 2024.	
Name :	
UCC :	

Signature of the Client: