PolicyonFreezing/BlockingClientAccount

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 forTrading Members to provide the facility of voluntary freezing/blocking of online access of thetradingaccounttotheirclients.

Itis pertinenttomentionthat:

- a. Freezing/blockingisonlyfortheonlineaccesstotheclient'stradingaccount,andthereshallben orestrictions on theRiskManagementactivitiesoftheTradingMember.
- $b. \ \ The request for freezing/blocking does not constitute request for marking the client's Unique Client Code (UCC) as in active in the Exchange records$
- 2. In view of the above the company has framed the following policygoverning the outline of the modus operandi. In addition to branch trading the company is extendingthe facility of internet trading through browser based. Presently we will be providing the following method of communications through which the clientmay request for voluntary freezing/ blocking of the online access of trading account if any suspicious activity is observed in the trading account:
 - a) <u>Email from registered e-mail ID</u>: A dedicated email ID **contact@rmsbplindia.com** has been opened where client can send their request for freezing/ blocking from their email IDregistered with us. Clients are requested to send their freezing/ blocking request without anyambiguity along with UCC.Similarly for un-freezing/ un-blocking, clients are requested to sendtheirrequestattheemailID<u>contact@rmsbplindia.com</u>fromtheirregisteredemailIDmen tioning the same.Request sent for such freezing/blocking and un-freezing/ un-blockingmay not be addressed by the company if it is not sent from client's registered email ID or sent to anyotheremailID of the company.
 - b) <u>SMS from registered mobile number</u>: A dedicated mobile number 9828165188 has been ssigned where client can send their request for freezing/ blocking from their mobile numberregistered with us. Clients are requested to send their freezing/ blocking request in the following manner:
 - Forfreezing/blockingtype: "BLOCK"FOLLOWEDBYUCCWITHOUTSPACEExample: if yourUCC is A123thenmessagewillbe "BLOCKA123" and send it to 9828165188.
 - Forun-freezing/un-blockingtype: "UNBLOCKFOLLOWEDBYUCCWITHOUTSPACE" Example: if your UCC is \$123 then message will be "UNBLOCK\$123" and send it to 9828165188.

Request sent for such freezing/ blocking and un-freezing/ un-blocking may not be addressed bythe 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 theclient;
 - Freeze / block the onlineaccess of theclient's trading accountand simultaneously cancelall the pending orders, if any, of the said client.
 - Issue the acknowledgement to the registered email ID or mobile number of the clientstating that the online access to the trading accounthas been frozen/ blocked and allthependingordersintheclient's tradingaccount, if any, have been cancelled.
 - Details of open positions (if any) would also be communicated to registered email ID oftheclientalongwithcontractexpiryinformationwithinonehourfromthefreezing/blocking ofthetrading account.
 - The timelines for freezing/ blocking of the online access of the clients' trading account isas under:

Scenario	Timelines for issuing acknowledgement as well as freezing/blocking of the online access of the trading account.
Requestreceivedduringthetradinghoursandwithi	Within15minutesofreceivingthereques
n15minutesbeforethestartoftrading	t.
hour.	
Requestreceivedafterthetradinghoursand15	Beforethestartofnexttrading session
minutesbeforethe closure oftradinghour.	-

- **4.** The company shall maintain the appropriate records/logs including request received to freeze/block theonline 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 forthetime limitasprescribed by the Regulator.
- **5. Re-enabling the client for online access of the trading account:** The Trading Member shallre-enable theonlineaccessoftradingaccountaftercarryingoutnecessarydue diligenceincluding validating the client request and unfreezing / unblocking the online access of thetradingaccount.

Signature of the Clien	t:
Date	: