



‘Voluntary Freezing or Blocking the Online Access of Trading Account’

Policy of FINDOC INVESTMART PRIVATE LIMITED

Policy Approved By:

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Policy for Voluntary Freezing or Blocking the Online Access of Trading Account

1. Introduction

As per SEBI vide its Circular SEBI/HO/MIRSD/POD-1/P/CIR/2024 dated January 12, 2024, a facility of freezing/ blocking the online access of investors trading accounts is essential to avoid any unwanted suspicious activities which is an integral part of an efficient risk management system for the investors. We have put in place a comprehensive policy which provides the facility of voluntary freezing/ blocking the online access of the trading account for our clients.

2. Scope and Review of Policy

This policy is applicable to Broking Business of Findoc Investmart Pvt Ltd.

The model of this policy consists of all employees who are directly, indirectly dealing with clients needs to understand and follow the policy to avoid unwanted suspicious activities in client’s trading account.

3. Framework for Voluntary Freezing/ Blocking of Trading Account

a) Following are the options from which clients can apply for the voluntary freezing/ blocking the trading account if any suspicious activity is observed in the trading account.

- i. Receipt of an email from client client’s registered E-mail ID at our dedicated E-mail id **stoptrade@myfindoc.com**
- ii. IVR/Telecalling at **0161-4155042**

b) We shall validate the authenticity of the request raised by the client through:

“Verification of request received from the registered phone number of the client”

c) After validation, we issue the acknowledgement as well as freeze/ block the online access of the client’s trading account and simultaneously cancel all the pending orders of the said client. The timelines for freezing/ blocking of the online access of the client’s 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

d) Post freezing/blocking the client’s trading account, we send a communication on the registered mobile number and registered email ID 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 along with the process of enablement for getting the online access to the trading account”.

- e) Details of open positions (if any) also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account. This will eliminate the risk of unwanted delivery settlement. This time limit shall be contracted after a review in the next six months after the date of its applicability to enhance protection of investors from suspicious activities.
- f) The appropriate records/ logs including but not limited to 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, sent to the clients shall be maintained.

4. Re-enabling the Client for Online Access of the Trading Account

We 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.

5. Further, 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 Findoc Investmart Pvt Ltd.
- b) The request for freezing/ blocking does not constitute request for making Unique Client Code (UCC) as inactive in the Exchange records.

Note: In case of statutory/ regulatory amendments from time to time, the policy can be internally reviewed and updated to comply with the new amendments.