POLICY FOR VOLUNTARY FREEZING / UNFREEZING OF ONLINE ACCESS OF CLIENT'S TRADING ACCOUNT

PRARAMBH SECURITIES PVT. LTD. SEBI REGN NO.: INZ000006130

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Policy for voluntary freezing / unfreezing of client's online access

1. Background

SEBI vide its circular SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and Exchanges vide their circulars dated April 08, 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.

The said circular also requires the trading members to frame a policy in line with the framework specified by the Exchanges, which shall be the part of the trading member's Risk Management Policy. The trading members shall disclose the said policy on their website. The said policy shall also form a part of the account opening kit for all new clients onboarded with effect from July 01, 2024.

2. <u>Scope</u>

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

3. Framework for voluntary freezing of online access of client's trading account -

a) Request for freezing/blocking access to Trading Account:

Client shall be required to request for voluntary freezing / blocking the online access of their trading account if any suspicious activity is observed in the trading account through the below mentioned modes:

<u>Email</u>: Send an email to <u>stoptrade@prarambhsec.com</u> using your registered email ID with the subject line "Freezing of My Trading Account – your Pan number."

<u>SMS</u>: You can send a SMS to us at <u>+91 9920865333</u> from your registered mobile number.

We kindly request you to provide the following details while you are sending a mail and/or sms to us: -

- UCC/Client ID
- Client Name
- PAN (Permanent Account Number)
- Registered Email ID
- Registered Mobile Number

Please note that upon receiving your request through either of the above-mentioned channel, we will promptly Freeze/Block your trading account access after verification and a confirmation for the same will be sent on your registered email address.

Further, in case of any pending orders same will be cancelled, and details of open positions (if any) will be mailed to you alongwith contract expiry details on your registered email id within one hour of freezing / blocking access of your trading account.

If the request for Freezing / Blocking access of online Trading account is received post market hours i.e., 3:30 PM the same shall be considered as a request for the next trading day and the access to the trading account shall be frozen / blocked before start of market hours of the next trading day.

b) Request for unfreezing/unblocking of Trading Account:

Client shall be required to request for unfreeze / unblock of the online access to their trading account through the below mentioned modes:

<u>Email</u>: Send an email to <u>stoptrade@prarambhsec.com</u> using your registered email ID with the subject line "Unfreezing of My Trading Account – your Pan number."**OR**

<u>SMS</u>: You can send a SMS to us at <u>+91 9920865333</u> from your registered mobile number.

We kindly request you to provide the following details while you are sending a mail and/or sms to us: -

- UCC/Client ID
- Client Name
- PAN (Permanent Account Number)
- Registered Email ID
- Registered Mobile Number

Please note that once your request for unfreeze / unblock of access to your Trading Account is verified same will be processed and confirmation for the same will be sent to you on registered email address.

c) Important Points:

- i. All logs of freeze and unfreeze request and communications sent shall be maintained for audit trail.
- ii. 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 Prarambh Securities Pvt. Ltd.
- iii. The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.
- iv. This policy shall be informed to all clients and shall also be a part of the account opening kit for all accounts opened with effect from July 01, 2024.
- v. The freeze, unfreeze, issue of communication shall be within the timelines specified by SEBI / Exchanges in this regard.

4. Policy Review

The said policy shall be a part of Prarambh Securities Pvt. Ltd.'s Risk Management Policy and shall be reviewed as and when further amendments being made to this facility by the SEBI / Exchange.