Voluntary Freezing/Blocking of Online Access Policy for Trading Accounts

Ref: SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024

1. Purpose:

The purpose of this policy is to provide guidelines and procedures for clients who wish to voluntarily freeze or block online access to their trading accounts on account of suspicious activities as per the regulations set forth by the above mentioned SEBI Circular and related exchange guidelines in this regard. This policy shall be treated as Annexure to the existing Risk Management Policy.

2. Scope:

This policy applies to all clients of Jyoti Broking Pvt. Ltd. who engage in trading activities through the any type of online mode/Internet Based Trading/Mobile Trading etc

3. Policy Statement:

Jyoti Broking Pvt Ltd. clients have the option to voluntarily freeze or block online access to their trading accounts for a specified period, as per the guidelines outlined by the SEBI/Stock Exchanges. This policy ensures that clients can exercise their rights to voluntarily freeze/block the online access of the trading account temporarily on account of suspicious activities. Based on the framework set by SEBI and exchanges, detailed guidelines are explained in this policy.

4. Procedure:

a. Request for Freezing/Blocking:

Clients who wish to freeze or block online access to their trading accounts must submit a formal request at Jyoti Broking Pvt. Ltd. via any one of the following modes:-

A) Email from registered email ID to dedicated email ID: **stoptrade@jyotiportfolio.com**

B) Website

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b. Validation ,Verification and Processing timelines:

Upon receiving the request, JBL shall verify the client's identity and ensure that the request aligns with the guidelines provided by the regulatory guidelines. JBL shall also take the following steps:-

A) 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 requested client.

B) 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 hours1 and within 15 minutes before the start of trading.	Within 15 minutes
Request received after the trading hours and 15 minutes before the close of trading.	Before the start of next trading session

1 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.

2 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. This time limit shall be contracted after a review in next six months after the date of its applicability to enhance protection of investors from suspicious activities.

c. Confirmation:

Post freezing/blocking the client's trading account, send a communication 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 client's trading account, if any, have been cancelled along with the process of re-enablement for getting the online access to the trading account.

Details of open positions (if any) should also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account eliminating risk of unwanted delivery settlement

JBL validate the request of freezing/blocking of the online access of trading account by verifying the request whether received from registered phone number/email id of the client.

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d. Maintenance of records:

The Trading Member shall maintain 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.

e. Incase of failure in freezing /blocking the online access within prescribed guidelines i.e. 15min incase request is received during trading hours and within 15 min before start of trading/before start of next trading session in case request is received after trading hours and 15 min before start of trading.

e. Re-enablement:

At the end of the freezing/blocking period, online access to the client's trading account will be reinstated automatically unless otherwise specified by the client. Client can place a request for the reinstatement of online access by submitting a formal request to JBL through the following method:-

A) Website
B) Registered Email id

JBL shall carry out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account before re-enablement of the online access of trading account.

6. Clarifications

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

7. Review:

This policy shall be reviewed periodically to ensure its effectiveness and compliance with regulatory requirements. Any necessary revisions or updates, if require shall be made accordingly.

8. Conclusion:

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

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

For Jyoti Broking Pvt. Ltd.

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