SEBI REG NO: INZ000185032 NSE MEMBER ID NO: 12098, BSE MEMBER ID NO.3131

# Policy Framework for Voluntary Freezing/Blocking of Trading Account Access of the Trading Account by our Clients. (it's a part of our Risk Management Policy)

- 1. Introduction: This policy framework is established in accordance with SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and Exchange Circular no. NSE/INSP/60277 dated January 16, 2024, NSE/INSP/61529 dated April 08, 2024 enabling trading members to offer clients the facility of voluntary freezing/blocking of online access to their trading accounts in case of suspicious activities.
- **2. Objective**: The primary objective of this policy is to provide clients with a mechanism to safeguard their trading accounts when they observe suspicious activities. By offering voluntary freezing/blocking of online access, clients can prevent unauthorized transactions and protect their investments.
- **3. Scope and Implementation:** This policy applies to all trading members providing internet-based trading, mobile trading, or other online access services to clients registered with Fair Intermediate Investment Pvt Ltd. The policy shall be applicable with effect from July 01, 2024. The policy shall be provided to new on boarded clients as part of account opening kit with effect from applicable date, July 01, 2024. It shall be communicated to all existing clients via email or any other suitable mechanism which can be preserved by July 01, 2024. In case, communication gets bounced/undelivered, the same shall be communicated through alternate channels to such clients. Other suitable mechanism may include physical delivery/SMS/electronic instant messaging services after adhering with the safeguards prescribed on Issuance of Electronic Contract Notes (ECN) through SMS/electronic instant messaging services.
- 4. **Policy Framework**: The framework for providing the facility of voluntary freezing/blocking of online access to trading accounts is as follows:

# Request for freezing

Client may request for voluntary freezing / blocking the online access to their trading account through any one of the following modes that shall be made

- Direct phone call to 9335290644 and 9335906871 from the registered mobile number between 9:00 a.m. and 5:00 p.m. on all trading days.
- Client can e-mail from his/her registered e-mail ID to our dedicated e mail id for this purpose stoptrade@fairinvest.co.in

## Procedure to be followed on receipt of request for freezing/blocking the trading A/c

Upon receipt of a valid request through registered phone number/email ID from registered client, trading members shall:

- Acknowledge the request and freeze/block online access within specified timelines.
- > Cancel all pending orders in the client's trading account.
- ➤ Communicate 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.
- > Requests received during trading hours or up to 15 minutes before start of trading: Within 15 minutes.
- Requests received after trading hours and before start of next trading session: Before the start of the next trading session.

Maintain logs of all requests, actions taken, and communications with clients regarding freezing/blocking of trading accounts, 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.

## **Request for Un-freezing**

**FURTHER**, for unfreezing/unblocking of online trading account facility, such client require to make written request and to submit self-attested copy of his/her PAN/Aadhar Card along with his/her request for unfreezing/unblocking of online trading account facility.

#### **Important Points**

- i. 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 Fair Intermediate Investment Pvt Ltd
- ii. The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.

### 5. Compliance and Review:

- Ensure compliance with SEBI and Exchange guidelines.
- Review and update the policy periodically to enhance investor protection and align with regulatory requirements.

This policy framework aims to provide a structured approach for trading members to handle requests for voluntary freezing/blocking of trading account access, ensuring transparency, security, and compliance with regulatory standards.

This policy shall be effective from July 01, 2024.

Approved by: Nalin Rastogi (Director)