



Jainam Broking Limited
(formerly known as Jainam Share Consultants Private Limited)

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

Version 2

Policy for voluntary freezing of client's online access

Annexure to Risk Management Policy

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. Scope:

This policy shall be applicable as and when clients requires 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 –

Whenever client of Jainam Broking Ltd (JBL) notice any suspicious activities in their online trading account and/or suspect that login credential of their trading account are breached/hacked and there is an urgent need to address the situation and block/freeze the access and/or activities in their trading account, the client can choose any of the following mode of communication to intimate/send a request to JBL for Voluntary Freezing/Blocking of their online Trading Account

a. Request for freezing

- i. 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 –
 - Email Id - Clients can send an email to stoptrade@jainam.in
 - Tele Call - Clients can Call on 0261-6725555 from their registered Mobile Number

1. The intimation should contain the minimum identity details required viz TRADING A/C. CODE / UCC / PAN / ACCOUNT NAME so that the correct account information is identified and Reason for Freeze/ Block. Upon receipt of the Email/Call, the JBL team will carry out the validation process as under;
2. Upon receipt of the email/Call, the JBL team will carry out the validation process as under;
3. Verify the sender's email Id in case the request is received from registered email Id.
4. Call the client on the registered mobile number.

5. Confirm the identity of client and
6. Reconfirm the request for block/freeze and reasons for such request.
7. Send confirmation to the client for Block/Freeze the trading activity in the particular trading code at the earliest and within the time frame that may be specified by the authorities from time to time.
8. Cancel all the pending orders in the trading system for that trading code.
9. Review and confirm the executed orders and outstanding position of the client for the day and take instructions/orders to square off any positions and execute such square off orders through RSM terminal as per instructions of clients at the earliest and within the time frame as may be specified by the authorities from time to time.
10. Post freezing/blocking the client's trading account, a communication shall be sent on the registered mobile number and registered e-mail ID of the client and/or via TeleCall through clients registered mobile number, stating that the online access to the trading account has been frozen/blocked. The communication shall also provide the details of all pending orders in the client's trading account, that have been cancelled along with the process of re-enablement for getting the online access to the trading account
11. 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.
12. Once the online access of the trading account is frozen / blocked such client may place orders through alternate channels such as call and trade.

b. Request for Un-freezing

1. Client may request for unfreezing / unblocking the online access to their trading account through any one of the following modes that shall be made –
 - Email Id - Clients can send an email to stoptrade@jainam.in
 - Tele Call - Clients can Call on [0261-6725555](tel:0261-6725555) from their registered Mobile Number
2. Upon receipt of the email/ Message the JBL team will contact the client to confirm the identity of client and genuineness of request, reset the login access credentials to the system default and communicate it to clients through its registered email Id / Mobile Number / TeleCall to clients registered number and unfreeze the trading account
3. An email acknowledgement shall also be sent to the client informing him / her of the unfreeze request and the date by which online access shall be activated.
4. On successful reactivation client shall be able to login.

c. Important points and clarifications:

- 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 JBL.
- 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 JBL's Risk Management Policy and shall be reviewed along with the said policy on a half yearly basis.

