

Policy created by	Operational/ Risk Management Staff		
Policy reviewed by	Compliance Head		
Approval Authority	Board of Directors		
Reference Circulars	Issuing Authority	Circular No.	Circular Date
	SEBI	SEBI/HO/MIRSD/POD-1/P/CIR/2024/4	12-Jan-2024
	NSE	NSE/INSP/61529	08-Apr-2024
	BSE	20240408-12	08-Apr-2024
	NSE	NSE/INSP/62822	05-Jul-2024
	BSE	20240710-2	10-Jul-2024
Policy formulation date	20-Jun-2024		
Policy approved by Board on	25-Jun-2024		
Policy applicable from	01-Jul-2024		

Background:

To enhance the ease of business operations and streamline investment activities for investors, and protect them from suspicious activities, SEBI, through its Circular bearing number SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, has mandated a framework for stock exchanges. This framework requires Trading Members to provide clients with the facility to voluntarily freeze/ block online access to their trading accounts. Consequently, stock exchanges have issued circulars detailing this framework. In line with these directives, the following policy has been formulated for the voluntary freezing/ blocking of trading accounts.

1. Client Notification and Request for Voluntary Freezing/ Blocking:

Clients who observe suspicious activities in their online trading accounts or suspect a breach/ hack of their login credentials can request to freeze/ block access to their trading accounts. The client can notify us through any of the following methods:

Option A: Clients can call on 8655312732 from their registered Mobile Number

Option B: Clients can send an Email to stoptrade@uniquestockbro.com from their registered Email ID

The intimation should contain the minimum identity details required viz. Trading Account Code, Unique Client Code [UCC], PAN and Account Name so that the correct account information is identified within shortest time. Upon receipt of the Email/ SMS, our team will carry out the validation process as under:

2. Validation Process:



- a) Verify the sender's Email ID/ Mobile Number and in case the request is received from **registered Email ID/ Mobile Number**:
- Call the client on the registered mobile number
 - Confirm the identity of client and reconfirm the request for block/ freeze and reasons for such request.
 - Send the acknowledgement of receipt of the request/ instruction to the sender's Email/ mobile and 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.
 - Cancel all the pending orders in the trading system for that trading code.
 - 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
 - Review and confirm the executed orders and outstanding position of the client and communicate details of open position (if any) along with contract expiry information within one hour (or within timelines as specified by authorities from time to time) from freezing/ blocking of the trading account.
 - Take instructions/ orders to square off any positions and execute such square off orders through admin terminal as per instructions of client at the earliest.
- b) Verify the sender's Email ID/ Mobile Number and in case the request is received from **other than registered Email ID/ Mobile Number**:
- Call the client on the registered mobile number.
 - Confirm the identity of client and reconfirm the request for block/ freeze and reasons for such request.
 - If the client is not contactable on the registered mobile number, call up on the number from which the instruction is received. Call alternate available numbers of family members or introducer or Authorised Person and establish the direct contact with client and confirm the identity of client by reconfirming at least two of the private and confidential client specific information with clients as available in client master database as part of additional due diligence to ensure and confirm the identity of the client.



- iv. Send the acknowledgement of receipt of the request/ instruction to the sender's Email/ mobile and Block/ Freeze the trading activity in the particular trading code within the time frame as may be specified by the authorities from time to time.
- v. Cancel all the pending orders in the trading system for that trading code under confirmation of clients only when the contact with client is established and identity of client is confirmed.
- vi. 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 action taken about pending orders in the client's trading account, along with the process of re-enablement for getting the online access to the trading account.
- vii. Review and confirm the executed orders and outstanding position of the client and communicate details of open position (if any) along with contract expiry information within one hour (or within timelines as specified by authorities from time to time) from freezing/ blocking of the trading account.
- viii. Take instructions/ orders to square off any positions and execute such square off orders through admin terminal as per instructions of client as and when the contact with client is established and identity of client is verified.

3. Time limits to Freeze/ Block the Trading Account:

Scenario	Time limits 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

The time limits are subject to change in accordance with the guidelines issued by the authorities from time to time.

4. Time limit to communicate details of open positions of the client post Freezing / Blocking the Trading Account:



In accordance with prevailing guidelines, we are required to communicate details of open position (if any) along with contract expiry information within one hour from freezing/ blocking of the trading account to eliminate the risk of unwanted delivery obligations. The time limits are subject to change in accordance with the guidelines issued by the authorities from time to time.

5. Procedure to Unfreeze/ Unblock the Trading Account:

Clients wishing to unfreeze/ unblock their account must send an Email to starttrade@uniquestockbro.com from their registered Email ID or send message on 8655312732 from their registered Mobile Number. Upon receipt of Unfreeze/ Unblock Request and post confirmation of identity and genuineness of the Unfreeze/ Unblock Request, login access and login credentials would be reset to the system default and it would be communicated to clients through their respective registered Email ID/ Mobile Number.

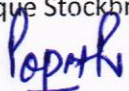
6. Clarification:


Freezing/ Blocking only restricts online access to the client's trading account. There will be no restrictions on the risk management activities of Unique Stockbro Private Limited. The request for Freezing/ Blocking does not equate to marking the client's Unique Client Code (UCC) as inactive in the Exchange records.

7. Timeframe:

This policy shall be effective from July 01, 2024.

For & behalf of
Unique Stockbro Private Limited


Paresh V. Popat
Director


Ashish V. Popat
Director



End of Report

Disclaimer: Policy for Voluntary Freezing/ Blocking of Online Trading Account Access for Clients [Annexure to Risk Management Policy] as depicted above is subject to change from time to time having regard to change in circumstances & regulatory guidelines. This Policy for Voluntary Freezing/ Blocking of Online Trading Account Access for Clients [Annexure to Risk Management Policy] shall be reviewed periodically in accordance with regulatory guidelines and management perception.