

Policy on freezing of online trading account

*Policy date- 10.07.2024
For & Exclusive use of JBS*

JBS SECURITIES PVT. LTD.

The policy has been framed as per SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 on the subject "Ease of Doing Investments by Investors - Facility of voluntary freezing/ blocking of Trading Accounts by Clients" and the relevant circulars issued by the exchanges.

Accordingly, this policy has been drafted in accordance with the framework presented by the exchange and the circulars issued by the exchanges so far. Following circulars has been considered while drafting the policy: NSE -IN5P/61529 and BSE- 20240408-12 on the subject: "Framework for Trading Members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients".

This policy is part and parcel of the Risk Management Policy of the company. The procedures outlined herein are as per regulatory requirements as prescribed in the aforementioned circulars. All clients are requested to note that the below mentioned guidelines are issued to facilitate the freezing/blocking of their respective online trading accounts upon explicit requests from the client in case they notice any suspicious activity on their trading account.

Procedure to Freeze/Block the Online Trading Account

In line with regulatory requirements, upon the explicit request from a client to block the online access to his/her trading account through any of the modes mentioned below, all efforts will be taken by the company's Risk Management Team to fulfill the request as per the below timelines:

- For requests received within trading hours, all efforts shall be taken to block online access of the account within 15 min.
- For requests received after trading hours to until 15 minutes before the market opening time, all efforts will be taken to block online access of the account before the start of the next trading session.

Client can raise request for freezing/blocking the online access of their trading account via following mode:

- (a) By mailing on the dedicated email id:
- Clients can submit request of freezing/blocking the online access of their trading account from their registered e-mail id to our risk management team on our dedicated email id: stoptrade@jbsindia.in
- (b) By calling on dedicated number:
- Clients should call the dedicated number of our Risk Management team on Phone no: 079- 48984505 from their registered phone numbers (number registered with the company).



If clients are not able to communicate via above two mode of communications, client can contact to our head office and submit written request of freezing/blocking online access of trading account. After necessary due-diligence and verification of client's identity, company will process client's request.

Please note that stringent identity verification will be conducted before considering any client's block request. Clients are requested to keep all basic PII information handy to facilitate the smooth and fast processing of request. Clients are requested to co-operate with the staff of the company and furnish all the necessary information required, as this is essential for executing the instruction of the clients.

After necessary due-diligence/verification of correctness of client's information/identity, company shall validate the request of freezing/blocking of the online access of the trading account.

On successful completion of validation of client's account, following activities will be carried out by company.

1. Cancel all the pending orders, if any of the client,
2. Freeze/block the online access of the client's trading account within a timeline specified by SEBI/Exchange(s),
3. Communicate to the respective client on their registered mobile number and/or e-mail ID,
 - The online access to the trading account has been frozen/blocked,
 - All the pending orders in the client's trading account, if any, have been cancelled and,
 - The process of re-enablement for getting the online access to the trading account.

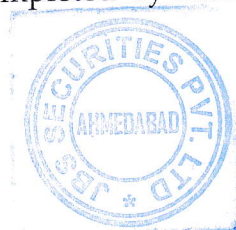
Further, open position(s) if any should also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account

In case of any profit/losses and financial charges on account of such order cancellation/liquidation of open position(s) shall be borne by the client only.

Company 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, will be send to the clients.

Re-enablement / Unfreeze of online access of the trading account

For re-enablement of online access of the trading account, clients may submit a physical request letter along with proof of identity to our risk management department and only after necessary due-diligence process completed by RMS team, online access of the client's trading account will be re-enabled.



Clarification:

It is clarified that, Freezing/blocking is only for online access of the client's trading account, and there shall be no restrictions on the Risk Management activities of company and the request for freezing/blocking does not constitute a request for marking the client's Unique Client Code (UCC) as inactive in our back office or Exchange UCC records.

Approval from the Board

The policy is also approved by the Board of Directors of the Company at the duly held meeting of the company.

The board of director has accorded their consent in implementing this policy as on **July 10, 2024**

FOR, JBS SECURITIES PVT. LTD.

1

DIRECTOR

