Matalia Stock Broking Private Limited

VOLUNTARY FREEZING/BLOCKING OF THE ONLINE TRADING ACCOUNT POLICY

Version 1.0

Document Control

Information:

Document	Classification	Version	Status
Voluntary Freezing/Blocking Of The Online Trading Account Policy	**Public**	**1.0**	**Approved**

Version History, Verification and Approval:

Date	Version	Description of Change	Owner	Approved By
June 25, 2024	1.0	1st Policy prepared	Mr. Dhyanesh S. Shukla	Mr. Rupesh C. Matalia

Distribution List:

Sl. No.	Departments Involved
1	Risk Management Team
2	DP Team
3	Legal Team
4	Support Team
5	Escalation Team
6	Technology Team
7	Process Team

Table of Contents

1. Introduction

This policy (v 1.0) has been prepared as per the SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, BSE Circular no. 20240112-30 dated January 16, 2024, NSE Circular no. NSE/INSP/60277 dated January 16, 2024 and MCX Circular no. MCX/INSP/036/2024 dated January 16, 2024 on the subject *"Ease of Doing Investments by Investors - Facility of voluntary freezing/ blocking of Trading Accounts by Clients"*.

Accordingly, this document has been derived from the framework presented by the exchange in response to the aforementioned circulars, via the Exchange Circular no. : BSE 20240408-12 dated April 08, 2024, NSE NSE/INSP/61529 dated April 08, 2024 and MCX MCX/INSP/218/2024 dated April 09, 2024 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 document is a handbook for the clientele of Matalia Stock Broking Private Limited (hereinafter referred to as MSBPL), outlining the process and mode(s) through which they can request to freeze / block & unfreeze/unblock their trading account. Other details, such as the timelines, clients' onuses, etc., to facilitate the same are also mentioned.

2. Purpose

The procedures outlined herein are per regulatory requirements in the aforementioned circulars. All clients are requested to note that the forthcoming guidelines are issued to facilitate the freezing/blocking of their respective online trading accounts upon explicit requests from the client's end in case they notice any suspicious activity on their trading accounts.

A few instances of suspicious activities would include:

- Fresh positions being taken without the client's knowledge or action.
- Holdings being sold without the client's knowledge or action.
- A client is unable to access his/her account.
- A client notices a change in their linked bank account/ email/ mobile number without them having placed a request.
- A share transfer via gift/ easiest is initiated without the client's knowledge or action.

3. Scope and Applicability

The policy statements written in this document apply to all of MSBPL resources at all levels of sensitivity; including:

- All the clients of MSBPL.
- All employees who are part of the relevant teams at MSBPL.

4. Periodic Review

This document essentially helps curb clients' risk and hence forms an integral part of MSBPL internal Risk Management Policy. As such, it shall be reviewed every half year unless an earlier review is necessary to ensure that the policy remains updated as per regulatory changes. Changes to this policy shall be exclusively performed by the document owner and approved by Management. A change log shall be kept current and updated as soon as any change has been made.

3. Procedure to Freeze/Block the Online Trading Account

3.1 Timelines

In line with regulatory requirements, upon the explicit request from a client to block the online access to their trading account through any of the modes mentioned in the forthcoming sections, all efforts will be taken by MSBPL Personnel to fulfill the request as per the below timelines:

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

3.2 Mediums

Clients can report suspicious activities on their trading account via the following mediums:

a. By mailing on the dedicated email ID: stoptrade@matalia.co.in
b. By calling the dedicated number: +91-9377378780 (between 8:30 am and 5:00 pm)

3.3 Verification (Mandatory)

- Requests raised on calls
  - Clients should call the dedicated number, **+91-9377378780,** from their registered phone numbers (number registered with MSBPL).
  - Please note that stringent identity verification will be conducted before considering any client's block requests. Hence, all clients are requested to keep all basic Personal Identification Information (PII) handy to facilitate the smooth and fast processing of requests. It is also recommended that clients keep their support code memorized/handy, as this would serve as additional two-factor authentication.
- Requests raised via the Telephone or dedicated Email
  - Clients are recommended to mail from their registered email address (email ID registered with MSBPL).
  - Clients are requested to give relevant and detailed information regarding the suspicious activity they have noticed on their trading accounts.
  - Clients who have raised requests via call or by mail shall receive a call back promptly from MSBPL personnel. Hence, they are advised to answer the call without fail.

3.4 Basic Checks & Initial Steps (Mandatory)

MSBPL personnel would ask a series of questions (basic checks) to understand the gravity of any request received. These queries would relate to the existing positions in the client's account, inadvertent sharing of login credentials, OTPs, orders, devices used for trading, etc.

Clients are requested to kindly cooperate with the MSBPL personnel and furnish all the information required, as this is essential for assessing the situation of the trading accounts.

MSBPL authorized personnel shall communicate to the client the details of the client's existing open positions. Subsequently, the personnel will solicit input from the client regarding their preferred course of action for these positions. Upon the client's directive and subject to successful authentication of the client, MSBPL will proceed to close the client's open positions and cancel all open orders. In such instances, applicable call and trade charges will be imposed.

Clients are requested to make an informed decision based on these suggestions and communicate their decisions clearly and unequivocally so that the MSBPL personnel can proceed with the blocking/freezing of their trading accounts.

Following the basic checks, the client's request and all response, Clients would receive all further updates on their requests On the registered Email id.

4. Procedure to Unfreeze/Unblock the Online Trading Account

- Clients can unfreeze/unblock their online trading accounts by raising a request via any of the modes prescribed under section 3.2.
- Please note that the client must mandatorily complete the Re-KYC procedure successfully to have their trading account unfrozen/unblocked.
- Following the successful completion of the Re-KYC procedure and after carrying out any other necessary due diligence, the client shall be intimated via mail regarding the status of their request.

5. Clarifications

It is clarified that:

a. Freezing/blocking is only for online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of MSBPL.

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

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