



GANESHAM SECURITIES (P) LIMITED

MEMBER : NSE CM, NSE FO, NSE CD, MCX CD

SEBI REGISTRATION NO. : INZ000231835

CIN : U67120WB1995PTC075644

Policy for voluntary freezing of client's online access

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 on boarded 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 / un-freezing of online access of client's trading account–

a. Request for freezing / un-freezing

i. Client may request for voluntary freezing / blocking and un-freezing / unblocking the online access to their trading account through any one of the following modes that shall be made –

- Letter duly signed and submitted to the head office/branch office of the TM;
- Email from registered e-mail id.

Upon receipt of the communication, our team shall validate the email / letter and initiate the process.

b. Important points

- 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 GSPL.
 - 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.
- i. 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 Ganesham Securities Private Limited Risk Management Policy and shall be reviewed along with the said policy on a yearly basis.

For: Ganesham Securities Pvt. Ltd.

For Ganesham Securities (P) Ltd.

Director

R. Chakrabarti

Director

