

FORMNING A PART OF RISK MANAGEMENT POLICY

Facility for voluntary freezing/ blocking the online access of the trading account

(Not applicable to clients who do not have online trading access)

1. Introduction

This is with reference to SEBI Circular SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, and Exchange Circular no. NSE/INSP/60277 dated January 16, 2024, informed the members the framework for trading members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients which shall be the part of member's Risk Management Policy. The trading members shall disclose on their website, the above policy along with the process and mode(s) through which the client can place the request to freeze / block & unfreeze / unblock the trading account along with the timelines that will be followed by the trading members for the same. With respect to new clients onboarded with effect from July 01, 2024, the policy so framed in line with the above-mentioned framework shall form part of account opening kit.

This policy framework also contains the Process and mode(s) through which the client can place the request to freeze/block & unfreeze / unblock the trading account along with the timelines that will be followed by the Trading Member for the same.

2. Framework of the voluntary freezing/blocking facility / Standard Operating Procedure (SOP):-

a. Mode of communication: -

The client shall request KTWPL for voluntary freezing/blocking the online access of trading account if any suspicious activity is observed in the trading account vide the below mentioned modes:

- a. Via Tele calling on the number 022-48480000
- b. Via email to stoptrade@ktwpl.com

b. Process to be followed: -

Validation:-

- i. KTWPL shall verify that the request for freezing/blocking the online access of the trading account is received from the respective client only.
- ii. Where the request is received from other than registered phone number of the client, client will be required to complete the authentication procedure (2 steps Authentication).

Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time.



Issuance of acknowledgment: -

i. KTWPL shall acknowledge the receipt of the request to the client. Acceptance or rejection mail will be displayed/announced on the WhatsApp Chat/IVR respectively or through any other legally verifiable modes as permitted in the SEBI "circular on Prevention of Unauthorized Trading by Stock Brokers" dated March 22, 2018 or as may be amended from time to time.

Freezing/blocking the online access of the client's trading account: -

- Upon successful validation, the client's trading account shall be frozen/blocked from online access.
- ii. An active Mutual Fund and Equity Systematic Investment Plan (SIP) shall remain active.
- iii. The client will continue to have offline access to the trading account i.e. the client will be able to place orders through the Authorized Person / dealer / call and trade and carry out any other offline activities such as raise request for statements, carry out client master modifications through physical requests etc.

Simultaneous cancellation of all the pending orders of the said client: -

- i. All pending orders from the client in all segments shall stand cancelled.
- ii. No fresh orders shall be allowed to be placed through online access.

Scenario and timelines: -

Scenario	Timelines 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

^{*} Trading hours shall be as follows: Capital Market Segment: 9.15 a.m. to 3.30 p.m., Equity Derivatives Segment: 9.15 a.m. to 3.30 p.m., Currency Derivatives Segment: 09.00 a.m. to 05.00 p.m., Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.

Post freezing/blocking the client's trading account: -

KTWPL shall 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 reenablement for getting the online access to the trading account.

Details of open positions (if any) would also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account. This will eliminate the risk of unwanted delivery settlement. This time limit may be contracted after Exchange's review and would stand effective as modified from time to time.

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Risk Management:

- It is clarified that:

 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 KTWP.

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

Process for re-enablement: -

KTWPL shall re-enable trading in the client's account after carrying out necessary due diligence including verifying the client using Two Factor Authentication and validating the client request and unfreezing / the account.

For unfreezing of the trading account, the client will have to get in touch on the dedicated phone number 022-48480000. Once such a request has been received and authenticated, the account will be unfrozen within 1 working day.

Maintenance of records/logs: -

KTWPL 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, sent to the clients.

The Compliance Officer is authorized to provide any suitable advice/clarification/exception on the said policy.

