

POLICY FOR VOLUNTARY FREEZING OF ONLINE ACCESS OF CLIENT'S TRADING ACCOUNT

(POLICY CREATED ON 01.07.2024)

AETRAM TRADES PRIVATE LIMITED

No 113-134, Unit No: 308, 3rd Floor, Beta Wing, Raheja Towers, Anna Salai, Chennai – 600002 Phone: 044 – 48680008

SEBI Registration No: INZ000309838 Trading MemberID -NSE-90356 | BSE-6832 |MCX - 57110

Prepared By

Mr. Prabhakar Sivaraman Compliance Officer

Approved By

Mr. Dinesh Kumar. G Designated Director

POLICY ON FACILITY OF VOLUNTARY FREEZING OF TRADING ACCOUNTS BY CLIENTS

1. INTRODUCTION

In order to enhance the ease of doing business and ease of doing investments for investors and to enhance protection of investors from suspicious activities; SEBI, has vide its circular ref. No. SEBI/HO/MIRSD/POD-1/ P/CIR/2024/4 dated January 12, 2024 has mandated that a framework shall be laid down by stock exchanges for Trading Members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients. Accordingly, stock exchanges have issued circulars providing a framework for trading members for the facility of voluntary freezing/blocking the online access of the trading members for the facility of voluntary freezing/blocking the online access of the trading members for the facility of voluntary freezing/blocking the online access of the trading account for clients.

In accordance with the above, Trading Members are required to frame a policy in line with the exchange prescribed framework, which shall be part of the trading member's Risk Management Policy and shall be displayed on its website 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 will be followed by the trading members for the same.

2. SCOPE AND APPLICABILITY

- A. Aetram Trades Private Limited, being a Trading Member providing Internet Based Trading/ Mobile Trading/ other online access for trading, is required to make available to the clients at least two modes as prescribed by the exchanges through which the client may request for voluntary freezing/ blocking the online access of trading account if any suspicious activity is observed in the trading account.
- B. The policy shall be applicable with effect from July 01, 2024.
- C. The policy shall be provided to new on boarded clients as part of account opening kit with effect from applicable date, July 01, 2024.
- D. It shall be communicated to all existing clients via email or any other suitable mechanism which can be preserved by July 01, 2024.

3. MODE OF RECEIPT OF REQUEST FOR FREEZING/BLOCKING THE TRADING A/C:

Following modes shall be provided by the Company for receipt of request for freezing/blocking the clients trading A/c:

- E-mail: Send your request to stoptrade@aetramtrades.in from clients registered email id with "Freeze/ Unfreeze - Trading Account" in the subject line.
- Customer Support: Call our customer support number (044 4001 6777) to inform us about the freezing/blocking of trading account from Clients registered phone number
- Online: Clients can freeze/block trading account via Mobile & Web application. (This facility is under process).



4. PROCEDURE TO BE FOLLOWED ON RECEIPT OF REQUEST FOR FREEZING/BLOCKING THE TRADING A/C.:

On receipt of request from clients through any of the prescribed modes of communications; for freezing/ blocking of the online access of the trading account from the client:

- a.Company shall validate that the request is received from a registered client and issue an acknowledgement for the same.
- b.Company shall freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the said client.

To validate that the request for freezing/blocking of the online access of the trading account is received from the respective client; company shall verify, whether request is received from his web login or from the registered e-mail Id / mobile number of the client.

c.The timelines for freezing/ blocking of the online access of the clients' trading account is as under:

| Scenario | Timelines for issuing acknowledgement a 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 |

- d. Post freezing/blocking the client's trading account, company 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 re-enablement for getting the online access to the trading account.
- e. 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 sent to the clients.

5. RE-ENABLING TRADING ACCESS:

Clients will only be allowed to enable trading access after 24 hours of voluntary freezing. You can call on the same IVR number (044-4001-6777) or send your request to Stoptrade@aetramtrades.in from your registered email id to with UnFreeze/UnBlock - Trading Account in the subject line.

6. CLARIFICATION FOR CLIENTS:

- 1. 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 company.
- 2. The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the records of respective Exchanges.

7. RECORD MANAGEMENT:

- 1. Company shall maintain a verifiable record of communication of this policy to all existing clients and obtain a confirmation of providing a copy of this policy from all new on boarded clients with effect from July 1, 2024
- Company shall maintain a verifiable record of all such requests received for freezing/ blocking of online access to trading account received from clients as per record management guidelines prescribed by the exchanges/regulator.

