

FACILITY FOR VOLUNTARY FREEZING/ BLOCKING THE ONLINE ACCESS OF THE TRADING ACCOUNT

(Not applicable to clients who do not have online trading access with MBL AND COMPANY LIMITED)

Introduction

In order to eliminate the risk of suspicious activities in clients trading accounts and to enhance ease of doing business & ease of investment. We do hereby inform and notify you that we have made a policy for voluntary freezing/blocking the online access of the trading accounts through which Client may request to freeze/block the online access of his/her trading account on account of suspicious activities, in compliance of SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated 12-Jan-2024 & NSE Circular No. 24/2024 dated 08-Apr-2024. The policy for the facility of voluntary freezing/blocking of trading accounts by clients is a significant measure implemented to enhance the security and integrity of the trading environment. This policy allows clients to proactively safeguard their trading account against unauthorized access or potential fraudulent activities. Under this framework, clients have the autonomy to request the freezing or blocking of their online trading account access. This can be particularly useful in scenarios where they suspect suspicious activities or as a precautionary step when they will not be trading for an extended period.

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.

Periodic Review

This document essentially helps curb clients' risk and hence forms an integral part of MBL AND COMPANY LIMITED 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.

Procedure to Freeze/Block the Online Trading Account

- **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 MBL AND COMPANY LIMITED 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 minutes.
- 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.

*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.

- **Mediums**

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

Option A: Clients can send an email to from their registered email ID.

Option B: Clients can call on the number from its registered mobile number to initiating a freeze/block online access of the trading accounts.

- **Verification (Mandatory)**

- Requests raised on calls

- Clients should call the dedicated number,, from their registered phone numbers (number registered with MBL AND COMPANY LIMITED).
- 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.

- Requests raised via the dedicated Email

- Clients are recommended to mail from their registered email address (email ID registered with MBL AND COMPANY LIMITED).
- Clients are requested to give relevant and detailed information regarding the suspicious activity they have noticed on their trading accounts.

- Clients who have raised block requests by mail shall receive a call back promptly from MBL AND COMPANY LIMITED personnel. Hence, they are advised to answer the call without fail.

- **Basic Checks & Initial Steps (Mandatory)**

MBL AND COMPANY LIMITED 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 MBL AND COMPANY LIMITED personnel and furnish all the information required, as this is essential for assessing the situation of the trading accounts.

MBL AND COMPANY LIMITED 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, MBL AND COMPANY LIMITED 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 MBL AND COMPANY LIMITED personnel can proceed with the blocking/freezing of their trading accounts.

An acknowledgement of the freezing/blocking request will be sent to the client's registered email address, and details of any open positions will be provided.

Procedure to Unfreeze/Unblock the Online Trading Account

MBL AND COMPANY LIMITED shall re-enable online 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 online trading access of the client account.

For unfreezing of the online access of trading account, the client will have to get in touch on the dedicated phone number (.....) and submit a request via their registered email address to

Clarifications

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 MBL AND COMPANY LIMITED.
- 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.

