<u>Policy on "Facility for voluntary freezing/blocking the online access of the trading account of clients''</u>

This is with reference to SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and Exchange Circular no. NSE/INSP/60277 dated January 16, 2024 on the subject "Ease of Doing Investments by Investors **- Facility of voluntary freezing/ blocking of Trading Accounts by Clients"** and NSE/INSP/ 61529 dated April 08,2024 and NSE/INSP/ 62822 dated July 05,2024 on the subject "**Framework for voluntary freezing/blocking the online access of the trading account to their clients**".

In an endeavor to deal with regulatory requirements and its timely implementation of the same by our all esteemed clients we would like to state below our policy framework on **"voluntary freezing/ blocking of Trading Accounts by Clients**"

1. <u>Voluntary freezing/ blocking of Trading Accounts by Clients</u>

The stock broking industry has undergone a huge transformation over last 2-3 decades from offline (Call and trade) mode traditional system to online mode of order placement. Under the online mode of system clients/ investors place their order and trade through by using one's login id and password as provided by their respective trading member. Having said that, although, even after taking utmost care and maintaining robust security standard for trading application, the threat of cyber fraud and leading to suspicious activity is not ruled out.

The foremost objective of aforesaid circulars is to protect the interest of clients/ investors by assessing the risk of any suspicious activity in their respective online access based trading account **(i.e. Login id / Password - Internet based trading / Mobile Trading),** which they hold with us (**SPS Share Brokers Private Limited**) and their by ensuring of taking **Voluntary freezing/ blocking of one's Trading Accounts in order to** mitigate / reduce the risk of any suspicious transaction and their by to mitigate /reduce any financial loss.

2. The clients/ Investor are required to place the request with us (**SPS Share Brokers Private Limited)** for **freezing/ blocking of** your respective trading account by following two (2) Mode of communication mentioning below details.

Client code/ Trading AC: - xxxx
Client Name: - ABC
Reason for freezing/ blocking: - Suspicious activity
Request Date:- dd/mm/yyyy

TWO (2) Mode of communication

Sr No	Source of communication (Client Communication)	Target of communication (SPS Share Brokers Private Limited)
1	Client Regsitered email id	stoptrade@sps.group
2	Client Regsitered Mobile	1. 022-62746274 (Ext:-101) 2. 022-62746274 (Ext:-227)

3. On receipt of the said communication from clients/ investors we (**SPS share Brokers Private Limited)** team shall ensure to implement the same as outlined below.

   A) The request received from respective clients/investor shall be validated for the registered email Id and mobile no.
   B) If the email and/or mobile no of client's / Investor's found to be unregistered with us the than we **(SPS Share Brokers Private Limited)** shall be constrained not entertain/ execute/ implement such request at it deemed fit.
   C) The request turnaround time shall be as below.

Sr No	Scenario	Timelines for issuing acknowledgement as well as freezing / blocking of the online access of the trading account
1	Request received during the trading hours and within 15 minutes before the start of trading.	Within 15 minutes
2	Request received after the trading hours and 15 minutes before the start of trading.	Before the start of next trading session

4. Post freezing/blocking of the clients /Investors trading account, we (**SPS share Brokers Private Limited)** shall send communication on your registered e-mail ID and mobile number updating / informing that the online access to the trading account has been frozen/blocked and all the pending orders in your respective trading account, if any, has been cancelled.

5. The Process for **re-enabling the clients/investors trading account** so freeze/ blocked by us shall be as below.

A) The clients/ Investors are required to place the request with us (**SPS Share Brokers Private Limited)** for **freezing/ blocking of** your respective trading account by following two (2) Mode of communication mentioning below details.

Client code/ Trading AC :- xxxx
Client Name :- ABC
Request Date :- dd/mm/yyyy

TWO (2) Mode of communication		
Sr No	**Source of communication (Client Communication)**	**Target of communication (SPS Share Brokers Private Limited)**
1	Client Registered email id	enablingtrade@sps.group
2	Client Regsitered Mobile	1. 022-62746274(Ext:-101) 2. 022-62746274(Ext:-227)

B) On receipt of the communication from clients/ Investors we (**SPS share Brokers Private Limited)** team shall ensure to implement the re-enablement in your trading account outlined below.

A) The request received from respective clients' shall be validated for the registered email Id and mobile no.
B) If the email id and/or mobile no of client's founds to be unregistered with the than we **(SPS Share Brokers Private Limited)** shall be constrained to not entertain/ execute/ implement such request at it deemed fit.
C) The request turnaround time shall be as below.

Sr No	**Scenario**	**Timelines for issuing acknowledgement as well as freezing / blocking of the online access of the trading account**
1	Request received during the Day till 3.00pm	Within 15 minutes
2	Request received after the trading hours (post 3.00pm)	Before the start of next trading session

Note:- The clients/ Investors trading account shall be frozen/blocked/ enabled at trading member level. The exchange UCC Status shall remain as it is. Unless, there is any specific regulatory advise and/ or become dormant.

===