

**VOLUNTARY FREEZING/BLOCKING OF THE ONLINE  
TRADING ACCOUNT POLICY**

of

**ASHLAR SECURITIES PVT LTD**

SEBI Registration Nos INZ000203739

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**Reference:**





SEBI circular no. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/04 dated January 12, 2024

NSE Circular no. NSE/INSP/60277 dated January 16, 2024

MCX circular no. MCX/INSP/218/2024 dated April 09, 2024

BSE circular no. 20240614-58 dated June 14, 2024

Document Control

Version	Creator/Author	Reviewer	Approved By	Date
1.0	Compliance Officer	COO	Designated Director	01/06/2024
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## VOLUNTARY FREEZING/BLOCKING OF THE ONLINE TRADING ACCOUNT POLICY

### Introduction

This policy has been created as per the SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, NSE Circular no. NSE/INSP/60277 dated January 16, 2024, MCX circular no. MCX/INSP/218/2024 dated April 09, 2024 and BSE circular no. 20240614-58 dated 14/06/2024 on the subject “Ease of Doing Investments by Investors - Facility of voluntary freezing/ blocking of Trading Accounts by Clients”.

Accordingly, this document has been derived from the framework presented by the exchange in response to the aforementioned circulars, via the Exchange Circular no.: [NSE/INSP/61529](#) dated April 08, 2024 on the subject: “Framework for Trading Members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients”.

This document is a handbook for the clientele of Ashlar Securities Private Limited (hereinafter referred to as Ashlar), outlining the process and mode(s) through which they can request to freeze / block & unfreeze/unblock their trading account. Other details, such as the timelines, clients’ onuses, etc., to facilitate the same are also mentioned.

### 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.

### Scope

The policy statements written in this document apply to all of Ashlar’s resources at all levels of sensitivity; including:

- All the clients of Ashlar.
- All employees who are part of the relevant teams at Ashlar.

## Policy and Procedure

This document essentially helps curb clients' risk and hence forms an integral part of Ashlar's internal Risk Management Policy.

### 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 Ashlar Personnel to fulfil 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 min.
- 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.

#### Mediums

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

- a. By mailing on the dedicated email ID: [stoptrade@ashlarindia.com](mailto:stoptrade@ashlarindia.com)
- b. By calling the number: 0120-6633205/231 (between 8:30 am and 5:00 pm)

#### Verification (Mandatory)

- Requests raised on calls
  - Clients should call the number, 0120-6633205/231, from their registered phone numbers (number registered with Ashlar).
  - 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 Support Portal or dedicated Email
  - Clients are recommended to mail from their registered email address (email ID registered with Ashlar).
  - 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 Ashlar personnel. Hence, they are advised to answer the call without fail.

### Basic Checks (Mandatory)

Ashlar 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 Ashlar personnel and furnish all the information required, as this is essential for assessing the situation of the trading accounts.

Ashlar's 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, Ashlar 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 Ashlar personnel can proceed with the blocking/freezing of their trading accounts.

After the basic check, all the responses will be noted and the customer's request will be approved. Further updates will be sent to the customers on their registered email.

### PROCEDURE TO UNFREEZE/UNBLOCK THE ONLINE TRADING ACCOUNT

- o Clients can unfreeze/unblock their online trading accounts by raising a request via any of the modes/medium prescribed in under "procedure for freeze trading account".
- o Please note that the client must mandatorily complete the Re-KYC procedure successfully to have their trading account unfrozen/unblocked.

### Review/Amendments of Policy:

- i. This policy shall be reviewed as and when needed by Compliance Officer.
- ii. In the event of any conflict between the circular or any other statutory enactment and the clause of this policy, the amendment shall prevail over this policy.
- iii. Any subsequent amendments/modification in the circulars shall automatically apply to the policy.

### Policy Communication:

A copy of the policy shall be made available to all the relevant staff, RMS department, and compliance officer for their information and any change should be communicated to them.