

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

1. Background:

SEBI vide it's circular SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and Exchanges vide their circulars dated April 08, 2024 mandated trading members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities.

The said circular also requires the trading members to frame a policy in line with the framework specified by the Exchanges, which shall be the part of the trading member's Risk Management Policy. The trading members shall disclose the said policy on their website. The said policy shall also form a part of the account opening kit for all new clients onboarded with effect from July 01, 2024.

2. Scope:

This policy shall be applicable when clients requires to freeze / block online access to their trading account and subsequently desires to unfreeze the same.

3. Framework for voluntary freezing / Un-freezing of online access of client's trading account:

(a) Request for freezing:

i. Mode of communication for freeze:

Clients can communicate the request to freeze their trading accounts through any of the following modes:

Option-1. By sending an Email from registered e-mail ID requesting for freezing/blocking to stoptrade@bfsl.co.in.

Option-2. By Submitting the form at our website www.bfsl.co.in under the head Account freeze.

ii. On receipt of such request, the online access of the client's trading account shall be freezed/blocked.

iii. Post freezing/blocking the client's trading account, a communication shall be sent 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.

iv. Details of open positions (if any) shall also be communicated to the client along with contract expiry information within such time as prescribed by regulators. This will eliminate the risk of unwanted delivery settlement.

(b) Request for Un-freezing:

- i. Client may request for unfreezing / unblocking the online access to their trading account by sending email at dp_helpdesk@bfsl.co.in from client's registered email.

4. Timings for freeze and actions thereof:

(a) Actions in point 3 above shall be taken within 15 minutes of receiving the request during market trading hours

(b) For requests received after trading hours:

- i. Cancellation of open orders in point 3 above will be done before market opening on the next trading day.
- ii. Square off existing positions in point 3 above will be done within 15 minutes of market opening on the next trading day.

5. Important Points:

(a) All logs of freeze and unfreeze request and communications sent shall be maintained for audit trail.

(b) 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 BgSE Financials Limited.

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

(d) The freeze, unfreeze, issue of communication shall be within the timelines specified by SEBI / Exchanges in this regard.

6. Policy Review:

The said policy shall be a part of BgSE Financials Limited Risk Management Policy and shall be reviewed along with the said policy by board of directors on a yearly basis.