Document Control



VOLUNTARY FREEZING/BLOCKING OF THE ONLINE TRADING ACCOUNT POLICY

Version 1.0

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Document Control

Document

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Voluntary Freezing/Blocking Of The Online Trading Account Policy	Public	1.0	Approved

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1. Introduction

This policy (v 1.1) has been revised as per the SEBI Circular no. <u>SEBI/HO/MIRSD/POD-1/P/CIR/2024/4</u> 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".*

Accordingly, this document has been derived from the framework presented by the exchange in response to the aforementioned circulars, via the Exchange Circular no.: <u>NSE/INSP/61529</u> 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 clienntele of Gurustox Limited Outlining the process and modes through which they can request to freeze /Block and unfreeze/unblock their trading accounts. Other details (timelines, how to use etc.) to facilitate the same are also mentioned.

2. 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.

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- 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.

3. Scope and Applicability

The policy statements written in this document apply to all Gurustox Ltd. resources at all levels of sensitivity, including:

- All Clients of Gurustox Ltd.
- All Employees who are involved in this process.

4. Periodic Review

This document essentially helps curb clients' risk and hence forms an integral part Risk Management Policy. As such, it shall be reviewed every year unless an earlier review is necessary to ensure that the policy remains updated as per regulatory changes. Changes to this policy shall be exclusively performed by the document owner and approved by Management. A change log shall be kept current and updated as soon as any change has been made.

3. Procedure to Freeze/Block the Online Trading Account

3.1 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 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 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.

3.2 Mediums

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

- By mailing on the dedicated email ID: **Stoptrade@horizonportfolio.in**
- By raising requests from our web site home page.
- By calling our telephone No. 0124-4061723.

3.3 Verification (Mandatory)

• Requests raised on calls

Client should call on the dedicated number: 0124-4061723 from their registered phone no. (Telephone No/Mobile registered with Gurustox Ltd)

 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. It is also recommended that clients keep their support code memorized/handy, as this would serve as additional

two-factor authentication.

- Requests raised via the Support Portal or dedicated Email
 - Clients are recommended to mail from their registered email
 - Clients are requested to give relevant and detailed information regarding the suspicious activity they have noticed on their trading accounts.

• Clients who have raised the request by Web site/Email shall received a call back from Gurustox Person , Hence they are advised to answer the call without fail.

3.4 Basic Checks & Initial Steps (Mandatory)

Gurustox Personnel would ask series of questions to understand the gravity of Any request received. These queries would relate to the existing position in the Client's account, inadvertent sharing of order positions, Login credential, devices used etc.

Clients are requested to kindly cooperate with Gurustox Ltd. Personnel and furnish all the information required, as this is essential for assessing the situation of the trading accounts.

Gurustox Ltd.'s authorized personnel shall communicate to the client the details of the client's open existing position. Subsequently ,the personnel shall solicit input from the client regarding their preferred course of action for these positions. Upon client's directive and subject to successful authentication of the client, Gurustox will proceed to close the client's open position and cancel all open orders. In such instance, applicable call and charges will be applicable.

Clients are requested to make an informed decision based on these suggestions and communicate their decision clearly and unequivocally so that the Gurustox personnel can proceed with blocking/freezing of their trading accounts.

Following the basic checks on client's request, client account will be freezed /hold.

4. Procedure to Unfreeze/Unblock the Online Trading Account

- Clients can unfreeze/unblock their online trading accounts by raising a request via any of the modes prescribed under <u>section 3.2</u>.
- Please note that the client must mandatorily complete <u>the Re-KYC</u> procedure successfully to have their trading account unfrozen/unblocked.
- Following the successful completion of the Re-KYC procedure and after carrying out any other necessary due diligence, the client shall be intimated via ticket/mail regarding the status of their request.

5. Clarifications

It is clarified that:

- a. 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 Gurustox Ltd.
- b. 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.

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