

B D SHAH SECURITIES LIMITED

R-701, Rotunda, Apollo Street, Fort, Mumbai – 400057

This Policy on providing the facility of voluntary freezing/blocking the online access of the trading account to clients is the property of M/s B D Shah Securities Limited and is confidential, not part, contents should be copied with prior approval of the undersigned.

I hereby approve the Policy on Providing the Facility of Voluntary Freezing / Blocking the Online Access of the Trading Accounts to Clients as prescribed under SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 Dated January 12, 2024 And Circulars Issued By Exchanges

For B D Shah Securities

Mitesh Bipin Shah Director Date: 27/06/2024 Place: Mumbai

Reviewed by Mr. Ashish Shah		Approved	by Mr. Mitesh Shah
	F	PAGE 1	INTERNAL USE



	1.	Contents, Distribution, Amendments	
Contents:			

Sr. No	Title	Page No
1	Cover Page, Approval	1
2	Contents, Distribution List, Amendments	2
3	Policy on providing the facility of voluntary freezing/blocking the online access of the trading account to clients	3

Distribution List

Sr. Conv. Type		COPY HOLDER	Locatio
No.	Сору Туре	Designation	n
1	Master Copy (Original & hard copy) and original soft copy	Ashish Shah, Director	Vile Parle
2	Soft read only copy on shared folder	All internal employees	Vile Parle

Amendments Made till / /

No.	Nature of Amendment	Reason for amendment	Date of Amendment
1			
2			
3			
4			
5			

Reviewed by Mr. Ashish Shah		Approved	D BY MR. MITESH SHAH
	F	PAGE 2	INTERNAL USE



B D SHAH SECURITIES LIMITED

Policy on providing the facility of voluntary freezing/blocking the online access of the trading account to clients (Applicable for all Exchange(s)/segment)

1. Background:

SEBI vide 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 and BSE – 20240112-30 dated January 12, 2024 & 20240408-12 dated April 8, 2024 has issued circular on Facility of voluntary freezing/ blocking of Trading Accounts by Clients". As per the said circular trading members are supposed to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities.

2. Purpose:

The purpose of this Policy is to set out the process to achieve the objective as mentioned above.

Major parameters of this Policy are mentioned below:

A. Mode of intimation by client for freezing/ blocking trading account

The client willing to freeze/block the on-line access of trading account on account of observance of any suspicious activity may request for voluntary freezing/ blocking the online access of trading account through following mode

- 1. Email from registered Email id of client on stoptrade@bdshah.com
- 2. Written request received from Client to KYC Department of BDSSL.

The request so received will be verified with our record and an acknowledgement will be issued to client post validation

B. Timelines to freeze / block the client account:

The online access of the trading account given to client will be freezed /blocked as also will cancel all the pending orders of the said client. The timelines for freezing/ blocking of the online access of the clients' trading account is as under:

Scenario	Timelines for issuing acknowledgement as well as freezing blocking of the online access of the trading account
Request received during the trading hours and within 15 minutes before the start of trading.	Within 15 mins
Request received after the trading hours and	Before the start of next trading session

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	F	PAGE 3	INTERNAL USE



15 minutes before the start of trading.

C. Trading hours will be as follows:

Segment	Start Time	End Time
Capital Market	9:15 am	3:30 pm
Equity Derivatives	9:15 am	3:30 pm
Commodity Derivatives	9:30 am	11:30 pm

The time limit of 15 minutes is being specified for the purpose of issuing acknowledgement as well as freezing/blocking of the online access of the trading account. The trading hours and the time limit may change depending upon the change in market timings.

3. Communication post freezing/blocking on-line access of trading account:

A communication will 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 and all the pending orders in the trading account, if any, have been cancelled.

Details of open positions (if any) will also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account.

4. Record Maintenance:

Following records/log with respect to request received to freeze/block the online access of trading account be preserved for future use:

- a. Confirmation given for freezing/blocking of the online access of the trading account
- b. Cancellation of pending orders, if any, sent to the clients.

5. Liability on the part of trading member in case of failure to freeze/block online access within time:

In case of failure in freezing/ blocking the online access within the prescribed timelines as per points 2 and 3 above, BDSSL shall be responsible for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.

6. Process for re-enabling the client for online access of the trading account:

Online access of trading account of the client shall be re-enabled only upon receipt of duly signed application form online access re-enablement in physical mode

OR

Receipt of request for re-enablement of online trading account through registered email id only.

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	F	PAGE 4	INTERNAL USE



Further, re-enablement of online access shall be done only after carrying out necessary due diligence including validating the client request

7. Clarification:

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

8. Effective Date:

This policy has been considered and adopted by the Board of Directors of B D SHAH SECURITIES LIMITED as per their meeting held on 27th day of June 2024.

9. Review and update:

This policy shall be reviewed and updated on an annual basis or as and when there are any changes introduced by any statutory authority.

====END OF DOCUMENT=====

REVIEWED BY MR. ASHISH SHAH		APPROVED BY	(Mr. Mitesh Shah
	F	PAGE 5	INTERNAL USE