



## Policy for voluntary freezing or blocking the online access of trading account

### Document Control

Document name	Policy for voluntary freezing or blocking the online access of trading account
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### Authorization

Document owner	Reviewed by	Authorized by
Compliance Team	Head – compliance	Director

### Amendment log

Version	Review date DD MMM YYYY	Remark
1.0	28 <sup>th</sup> Jun 2024	Policy for voluntary freezing or blocking the online access of trading account

### Distribution list

Chief Information Security Officer (CISO)
Management
Compliance Team
KYC Team
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Auditors (Internal & External)
All users at Wallfort Financial Services Ltd.



## 1. Introduction

As per SEBI vide its circular SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, a facility of freezing/blocking the online access of investors' trading accounts is essential to avoid any unwanted suspicious activities which is an integral part of an effective risk management system for the investors. However, such a policy is not applicable to us as we don't provide online trading facilities, i.e. internet based trading/ mobile trading/ other online access for trading to our clients. However, we have put in place a comprehensive policy which provides the facility of voluntary freezing /blocking the online access of the trading account for our clients.

## 2. Scope & Review of policy

This policy is applicable to broking business of Wallfort Financial Services Ltd.

The model of this policy consists of all employees who are directly, indirectly dealing with clients' needs to understand and follow the policy to avoid unwanted activities in clients trading account.,

## 3. Framework for voluntary freezing/ blocking the of trading account

- a) Following are the options from which client can apply for the voluntary freezing/blocking the trading account if any suspicious activity is observed in the trading accounts
  - i. Receipt of an email from registered email id at our dedicated id [Stoptrade@wallfort.com](mailto:Stoptrade@wallfort.com)
  - ii. Receipt of duly signed original/ physical application at our office.
  - iii. Received Call from Client on 022 61176019
  
- b) We shall validate the authenticity of the raised by the clients through;
  - i) 2FA ( 2 Factor Authentication) or
  - ii) Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time
  
- c) After validation, issue the acknowledgement as well as freeze/ block the online access of the clients trading account and simultaneously 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 acknowledgment as well as freezing/ blocking of the online access of the Trading account.
Request received during the trading hours <sup>1</sup> and within 15 mins before start of trading.	Within 15 Mins
Request received after the trading hours and 15 min before the start of trading	Before the start of next trading session

- d) Post freezing/blocking the client's trading account, we will send a communication on the registered mobile number and registered email ID of the client stating that **"The online access of the trading account has been frozen/blocked and all pending orders in the client's trading account, if any, have been cancelled along with the process of re-enablement for getting the online access to the trading account"**.
- e) Details of open position (if any) shall also be communicated to the clients along with expiry information within **one hour** from the freezing/blocking of the trading account. This will eliminate the risk of unwanted delivery settlement.
- f) The appropriate records/logs including but not limited to, request to freeze/block the online access of trading account, confirmation given for freezing/blocking of the online access to the trading account and cancellation of pending orders If any sent to the clients shall be maintained
4. Re-enabling the client for online access of the trading account

We shall re- enable the online access of the trading account after carrying out necessary due diligence including validating the client and unfreeze / unblocking the online access of the trading account.

**5. Further, it is clarified that:**

- 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 Wallfort Financial Services Ltd.



- b) The request for freezing / blocking does not constitute request for making client unique client code (UCC) as inactive in the Exchange records.

**6. Disclaimer note**

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**Note:**

In case of statutory/regulatory amendments from time to time, the policy can be internally reviewed and updated to comply with the new amendments.

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