

Annexure

Voluntary Freezing/Blocking of Online Access Policy for Trading Accounts **Ref: SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024**

1. Purpose:

The purpose of this policy is to provide guidelines and procedures for clients who wish to voluntarily freeze or block online access to their trading accounts on account of suspicious activities as per the regulations set forth by the above mentioned SEBI Circular and related exchange guidelines in this regard. This policy shall be treated as Annexure to the existing Risk Management Policy.

2. Scope:

This policy applies to all clients of Istaa Finserv Private Limited who engage in trading activities through the online mode.

3. Definitions:

Voluntary Freezing/Blocking: The act of temporarily suspending online access to a trading account upon the request of the client.

- **Trading Account:** A client's account used for trading securities on the stock exchange platform.

4. Policy Statement:

Clients of Istaa Finserv Private Limited have the option to voluntarily freeze or block online access to their trading accounts for a specified period, as per the guidelines outlined by the SEBI/Stock Exchanges. This policy ensures that clients can exercise their rights to voluntarily freeze/block the online access of the trading account temporarily on account of suspicious activities. Based on the framework set by SEBI and exchanges, detailed guidelines are explained in this policy.

5. Procedure:

1) Request for Freezing/ Blocking

Clients who wish to freeze or block online access to their trading accounts must submit a formal request to Istaa Finserv Private Limited through any one of the following methods:-

- A. SMS from registered mobile number
- B. IVR/tele calling

2) Verification and Processing timelines:

Upon receiving the request, Istaa Finserv Private Limited shall verify the client's identity and ensure that the request aligns with the guidelines provided by the regulatory guidelines. Istaa Finserv Private Limited shall also take the following steps:-

- A. Issue the acknowledgement as well as freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the requested client.

- B. 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 minutes
Request received after the trading hours and 15 minutes before the close of trading.	Before the start of next trading session

1. Trading hours shall be as follows:

Capital Market Segment: 9.15 a.m. to 3.30 p.m.,
Equity Derivatives Segment: 9.15 a.m. to 3.30 p.m.,

2. To begin with, 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. This time limit shall be contracted after a review in next six months after the date of its applicability to enhance protection of investors from suspicious activities.

3) Confirmation:

Post freezing/blocking the client's trading account, send a communication 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 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.

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

4) Maintenance of Records:

The Trading Member shall maintain the appropriate records including, but not limited to, request received to freeze/block the online access of trading account, confirmation given for freezing/blocking of the online access of the trading account and cancellation of pending orders, if any, sent to the clients.

5) Re-Enablement:

At the end of the freezing/blocking period, online access to the client's trading account will be reinstated automatically unless otherwise specified by the client. Client can place a request for the reinstatement of online access by submitting a formal request to Istaa Finserv Private Limited through the following method:-

Istaa Finserv Private Limited shall carry out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account before re-enablement of the online access of trading account.

6. 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 Istaa Finserv Private Limited.
- b) The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.

7. Review:

This policy shall be reviewed periodically to ensure its effectiveness and compliance with regulatory requirements. Any necessary revisions or updates, if require shall be made accordingly.

8. Conclusion:

This policy outlines the procedures and guidelines for clients who wish to voluntarily freeze or block online access to their trading accounts on account of suspicious activities in accordance with the exchange guidelines. By adhering to these guidelines, Istaa Finserv Private Limited aims to facilitate a seamless process for clients to exercise their rights while maintaining regulatory compliance.