

Policy on Voluntary Freezing/Blocking of Online Access to Trading Accounts

1. Objective

To comply SEBI and Exchanges circulars and guidelines, this policy outlines the procedures for voluntarily freezing/blocking online access to trading accounts based on suspicious activities, ensuring the protection of clients' investments.

2. Modes of Communication

Following communication modes to request freezing/blocking of their online trading account:

- **Email:** Requests must be sent from the registered email ID. The dedicated email ID for such requests is **stoptrade@lakshmishree.com**.
- **SMS/Call:** Requests must be sent on **G2353G58G5** from the registered mobile number.

3. Action on Request

Upon receiving a request for freezing/blocking the trading account, Trading Members shall:

- **Validate the Request:** Ensure the request is from the registered client through the designated communication methods.
- **Acknowledge and Freeze/Block Account:** Acknowledge the request and freeze/block the online access to the trading account, canceling all pending orders. The timelines are:
 - **During Trading Hours (Capital Market Segment: G:15 am to 3:30 pm, Equity Derivatives Segment: G:15 am to 3:30 pm, Currency Derivatives Segment: G:00 am to 5:00 pm, Commodity Derivatives Segment: G:00 am to 11:30 pm):** Within 15 minutes after verification of request.
 - **Outside Trading Hours:** Before the start of the next trading session after verification of request.
- **Communication:** Send a notification to the client's registered mobile number and email ID confirming the freeze/block action and provide details on the process for re-enablement. Additionally, provide information on open positions and contract expiry within one hour of the action.

4. Validation Mechanism

The Trading Member shall verify requests using:

- **Registered Details:** Confirm the request comes from the registered phone number or email ID.
- **Two-Factor Authentication:** Implement a client authentication procedure if the request is made from other than registered details.
- **Other Processes:** Follow additional procedures as prescribed by the Exchange or SEBI.

5. Record Keeping

Maintain detailed records/logs of:

- Requests received for freezing/blocking online access.
- Confirmation of the freeze/block action.
- Cancellation of pending orders.
- Communications sent to clients regarding the freeze/block action.

6. Responsibility for Failures

In cases where the Trading Member fails to freeze/block access within the prescribed timelines, the Trading Member shall be held responsible for any trades executed from the time of request receipt until the action is completed.

7. Re-enabling Access

Re-enable online access to the trading account only after completing necessary due diligence, including client request verification and unblocking procedures.

8. Clarifications

- **Scope of Freeze/Block:** The freeze/block applies only to online access and does not affect the Trading Member's Risk Management activities.
- **UCC Status:** Freezing/blocking requests do not affect the status of the client's Unique Client Code (UCC) in exchange records.

G. Circular references:

- SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024
- NSE/INSP/61529 dated April 08, 2024
- BSE notice 20240408-12 dated 08 Apr 2024
- MCX/INSP/218/2024 dated April 09, 2024

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