

POLICY ON PROVIDING THE FACILITY OF VOLUNTARY FREEZING/BLOCKING THE ONLINE ACCESS OF THE TRADING ACCOUNT TO CLIENTS

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, has issued circular on “Facility of voluntary freezing/blocking of Trading Accounts by Clients”.

As per the said circular, Tradebulls provides the facility of voluntary freezing/blocking the online access of the trading account to our clients on account of suspicious activities.

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:

Mode of intimation by client for freezing/ blocking trading account

Client willing to freeze/block the online access of trading account on account of observance of any suspicious activity may request for voluntary freezing/blocking the online access of trading through following modes:

- Email from registered e-mail ID to registered email id: Stoptrade@tradebulls.in
- Trading Member's App / website: <https://login.tradebulls.in/>

The request received will be verified with our record, and an acknowledgment will be issued to the client post validation.

Upon receiving the request from respective client 's registered email ID, verifying the details along with two-factor authentication, we will consider the request and freeze the account.

Online access of the trading account provided to the client will be frozen or blocked , and all pending orders will be cancelled.

The timelines for freezing/blocking of the online access of the clients' trading account is as follows:

Scenario	Timelines for issuing acknowledgment as well as freezing/blocking 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 start of trading	Before the start of next trading session

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.,

Currency Derivatives Segment: 09.00 a.m. to 05.00 p.m.,

Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.

The specified time limit of 15 minutes is for issuing acknowledgment and freezing/blocking online access of the trading account.

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

A communication will be sent to the client's registered mobile number and e-mail ID, stating that 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 of freezing/blocking the trading account.

Record Maintenance: Records/log regarding requests received to freeze/block online access of trading accounts should be preserved for future use. Confirmation given for freezing/blocking online access of the trading account and cancellation of pending orders, if any, will be sent to the clients.

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

Submission of a duly signed application for online access re-enablement: Clients can unblocked/unfreeze their account via mobile or back office application. Additionally, users can enable trading by sending an email to designated email id.

Request for re-enablement through registered email id.

Re-enablement of online access will be done after carrying out necessary due diligence, including validating the client's request.

Clarifications:

a. Freezing/blocking applies only to the online access of the client's trading account, and there are 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.

Effective Date: This policy is effective from 1st July 2024

Review and update: This policy shall be reviewed and updated annually basis or as and when changes are introduced by any statutory authority.