



Voluntary Freezing/ Blocking of The Online Trading Account Policy

(Version 1.1 dated 27.02.2025)

(Last Version 1.0 dated 28.06.2024)

Voluntary Freezing/ Blocking of the Online Trading Account Policy

Introduction:

In accordance with SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, Exchange Circular No. NSE/INSP/60277 dated January 16, 2024, and NSE/INSP/61529 dated April 08, 2024, titled "Ease of Doing Investments by Investors - Facility of Voluntary Freezing/Blocking of Trading Accounts by Clients", trading members ("GEPL") are mandated to provide clients the facility to voluntarily freeze or block online access to their trading accounts in the event of suspicious activities.

This document is derived from the specified framework and necessitates the creation of a policy aligned with the framework outlined by the Exchanges. This policy shall be incorporated into GEPL's Risk Management Policy. GEPL will disclose the policy on their website, and it will also be included in the account opening kit for all new clients on-boarded from July 1, 2024.

Purpose:

The procedures detailed in this document are established in accordance with the regulatory requirements specified in the aforementioned circulars. These procedures provide clients with the facility to freeze or block their respective trading accounts if they detect any suspicious activities.

Scope:

This policy shall apply whenever clients require the freezing or blocking of online access to their trading accounts and subsequently wish to unfreeze them.

Periodic Review:

This policy shall be reviewed every six months, unless an earlier review is necessary to ensure that the policy remains updated as per regulatory changes. Changes to this policy shall be exclusively performed by the document owner and approved by Management. A change log shall be maintained and updated promptly whenever changes occur.

Procedure to Freeze/Block the Online Trading Account:

1. Freezing of Trading Account (Request from Client)

Clients may request voluntary freezing/blocking of online access to their trading accounts through any of the following modes:

- By emailing the dedicated email ID: stoptrade@geplcapital.com
- By raising a ticket via GEPL's official Support Portal.
- By calling the dedicated number: 8035214439
- Through the Web Trading Platform

2. Basic Checks & Initial Steps (Mandatory)

- GEPL will call the client within a specified timeframe to update them about any open positions in their account, if applicable.
- The request method shall be verified before freezing the account, and proper due diligence shall be performed by GEPL.
- GEPL will obtain input from the client regarding their preferred course of action for any open positions. Upon the client's directive and successful authentication, GEPL will proceed to close the open positions and cancel all open orders. Applicable call and trade charges will be imposed in such cases.
- Clients are advised to make informed decisions based on these suggestions and communicate their decisions clearly to enable GEPL personnel to proceed with the blocking/freezing of their trading accounts.
- Following the basic checks, a ticket will be created (if not already raised) against the client's request, and all responses will be recorded. Clients will receive further updates on their requests via the ticket created.
- Online Request: Clients shall log in through the web application and place a request.
- IVR Request: Requests received through IVR shall be verified by GEPL, and, upon validation, further processing will be undertaken.

3. Timelines

In line with regulatory requirements, upon an explicit request from a client to block the online access to their trading account through any of the mentioned modes, GEPL personnel shall make all efforts to fulfill the request within the following timelines:

- For requests received within trading hours, account blocking shall be completed within 15 minutes.
- For requests received after trading hours, and until 15 minutes before market opening time, account blocking shall be completed before the start of the next trading session.
- GEPL shall verify all credentials and perform due diligence before unfreezing the account.
- An email acknowledgement shall be sent to the client informing them of the unfreeze request and the date by which online access shall be activated.
- Upon successful reactivation, the client shall be able to log in to the web trading portal.
- If the account was inactive beyond the legitimate timeframe, the client will be required to execute the Re-KYC procedure. Upon successful completion, the account shall be active.
- Following the successful completion of the Re-KYC procedure and any other necessary due diligence, the client shall be informed via ticket/mail regarding the status of their request.

Points to Note:

- All logs of freeze and unfreeze requests, as well as communications sent, shall be maintained for audit trail purposes.
- Freezing/blocking is only for the online access to the client's trading account, and there shall be no restrictions on GEPL's Risk Management activities.
- The request for freezing/blocking does not constitute a request for marking the client's Unique Client Code (UCC) as inactive in the Exchange records.
- This policy shall be communicated to all clients and shall also be a part of the account opening kit for all accounts opened from July 01, 2024.
- The freeze, unfreeze, and issue of communication shall be within the timelines specified by SEBI/Exchanges in this regard.

For GEPL Capital Private Limited

Sd/-