VOLUNTARY FREEZING/BLOCKING OF THE ONLINE TRADING ACCOUNT POLICY-Version 1.0

1. Introduction

This policy (v 1.0) has been prepared as per the SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, BSE Circular no. 20240112-30 dated January 16, 2024, NSE Circular no. NSE/INSP/60277 dated January 16, 2024 and MCX Circular no. MCX/INSP/036/2024 dated January 16, 2024 on the subject "Ease of Doing Investments by Investors - Facility of voluntary freezing/ blocking of Trading Accounts by Clients". Accordingly, this document has been derived from the framework presented by the exchange in response to the aforementioned circulars, via the Exchange Circular no.: BSE20240408-12 dated April 08, 2024, NSE NSE/INSP/61529 dated April 08, 2024 and MCXMCX/INSP/218/2024 dated April 09, 2024 on the subject: "Framework for Trading Members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients". This document is a handbook for the clientele of Eastern Financiers Limited (hereinafter referred to as EF), outlining the process and mode(s) through which they can request to freeze / block & unfreeze/unblock their trading account.

2. Purpose

The procedures outlined herein are per regulatory requirements in the aforementioned circulars. All clients are requested to note that the forthcoming guidelines are issued to facilitate the freezing/blocking of their respective online trading accounts upon explicit requests from the client's end in case they notice any suspicious activity on their trading accounts.

3. Procedure to Freeze/Block the Online Trading Account

3.1 Timelines

In line with regulatory requirements, upon the explicit request from a client to block the online access to their trading account through any of the modes mentioned in the forth coming sections, all efforts will be taken by EF Personnel to fulfill the request as per the below timelines:

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
within 15 minutes before the start of trading	
Request received after the trading hours and	Before the start of next trading session
15 minutes before the start of trading	

3.2 Mediums

Clients can report suspicious activities on their trading account via the following mediums:

- a. By mailing on the dedicated email ID: stoptrade@eflmail.com
- b. By calling the dedicated number: +91-9147394959 (between 8:30 am and 5:00pm)

3.3 Verification (Mandatory)

-Requests raised on calls

Clients should call the dedicated number, +91-9147394959, from their registered phone numbers (number registered with EF).

Please note that stringent identity verification will be conducted before considering any client's block requests. Hence, all clients are requested to keep all basic Personal Identification Information (PII) handy to facilitate the smooth and fast processing of requests. It is also recommended that clients keep their UCC code memorized/handy, as this would serve as additional two-factor authentication.

- Requests raised via dedicated Email

Clients are recommended to mail from their registered email address (email ID registered with EF). Clients are requested to give relevant and detailed information regarding the suspicious activity they have noticed on their trading accounts.

3.4 Initial Steps

EF personnel would ask a series of questions (basic checks) to understand the gravity of any request received. These queries would relate to the existing positions in the client's account, inadvertent sharing of login credentials, OTPs, orders, devices used for trading, etc. EF authorized personnel shall communicate to the client the details of the client's existing open

positions. Subsequently, the personnel will solicit input from the client regarding their preferred course of action for these positions. Upon the client's directive and subject to successful authentication of the client, EF will proceed to close the client's open positions and cancel all open orders. In such instances, applicable call and trade charges will be imposed.

Clients are requested to make an informed decision based on these suggestions and communicate their decisions clearly and unequivocally so that the EF personnel can proceed with the blocking/freezing of their trading accounts.

Following the basic checks, the client's request and all response, Clients would receive all further updates on their requests on the registered Email id.

4. Procedure to Unfreeze/Unblock the Online Trading Account

- Clients can unfreeze/unblock their online trading accounts by raising a request via any of the modes prescribed under section 3.2.
 - Please note that the client must mandatorily complete the Re-KYC procedure successfully to have their trading account unfrozen/unblocked.
 - Following the successful completion of the Re-KYC procedure and after carrying out any other necessary due diligence, the client shall be intimated via mail regarding the status of their request.

5. Clarifications

It is clarified that:

- a. Freezing/blocking is only for online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of EF.
- b. 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.