

# NAM SECURITIES LTD

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## **Policy For Voluntary Freezing or Blocking the online access of the Trading Account**

As per requirements of SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 Trading Members to providing the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities. We, Nam Securities Ltd have framed a comprehensive policy which provide the facility of voluntary freezing/ blocking the online access of the trading account for our clients:

### **Framework For Voluntary Freezing or Blocking the online access of the Trading Account**

1. Following are the modes of communication from which a client can apply for voluntary freezing/blocking the trading account on account of any suspicious activities in his/her trading account: -
  - a) Tele calling at our registered office at the phone no. 011-23731122
  - b) Receipt of an email from client registered email id at our dedicated email id -: **stoptrade@namsecurities.in**
  
2. We shall validate the request by verifying
  - a) Whether request is received from the registered phone/e-mail Id of the client; or where request is received from other than registered phone number/e-mail Id of the client,

Or

Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time.

- b) And 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 said client. 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 start of trading.	Before the start of next trading session

3. 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.
4. 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. This will eliminate the risk of unwanted delivery settlement. This time limit shall be contracted after a review in the next six months after the date of its applicability to enhance protection of investors from suspicious activities.
5. We will maintain the appropriate records/logs 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.
6. In case of failure of the Trading Member in freezing/ blocking the online access within the prescribed timelines ( **15 minutes in case the request is received during the trading hours and within 15 minutes before the start of trading / Before the start of the next trading session in case the request is received after the trading hours and 15 minutes before the start of the trading** ), Trading Member **shall be responsible** for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.
7. **Re-enabling the client for online access of the trading account:** - The Trading Member shall re-enable the online access of trading account after carrying out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account.

8. It is clarified that:

- 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 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.
- c. In case of regulatory amendments from time to time, the policy can be internally reviewed and updated to comply with the new amendments.
- d. The policy is a part of our Risk Management Policy.

For: Nam Securities Ltd.

**For NAM SECURITIES LTD.**

Director

**Director**

Date:- 28.06.2024