



Amendment to the Risk Management policy forming part of Policies and procedures

Voluntary Freezing/Blocking of Online Access Policy for Trading Accounts

Ref: SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024

Purpose:

The purpose of this policy is to provide guidelines and procedures for clients who wish to voluntarily freeze or block online access to their trading accounts on account of suspicious activities as per the regulations set forth by the above-mentioned SEBI Circular and related exchange guidelines in this regard.

Procedure:

A. Request for Freezing/Blocking:

Clients who wish to freeze or block online access to their trading accounts must submit a request through any one of the following methods: -

1. Email from their registered email ID to : stoptrade@way2wealth.com
2. Call from client's registered mobile number to our office Toll free Telephone Number – 1800 203 3690 and +91 80 47185579 and use the IVR menu option “2” for freezing or blocking online access to trading account.

B. Verification and Processing timelines:

- Upon receiving the request to the above-mentioned email ID, we will send an acknowledgement and a reference ticket number to the client. If the request is received through the IVR menu, we will do client identity verification with a few demographic questions and/or may call back to the registered mobile number to confirm receipt of the request.
- We will verify the client's identity through demographic checks, ensuring the authenticity of the request received from a registered email ID or call received from a registered mobile number.
- Once the authenticity of the request is confirmed, we will cancel all pending orders and freeze/block the online access of the client's trading account.

- a) 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 ¹ and within 15 minutes before the start of trading.	Within 15 minutes ²
Request received after the trading hours and 15 minutes before the close of trading.	Before the start of next trading session

¹ 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.

² To begin with, the time limit of 15 minutes is being specified for the purpose of issuing acknowledgement as well as freezing/blocking of the online access of the trading account. This time limit shall be contracted after a review in next six months after the date of its applicability to enhance protection of investors from suspicious activities.

C. Confirmation:

Post freezing/blocking the client's trading account, we will send a communication on the registered e-mail ID and a call confirmation to the registered mobile number 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. The process of re- enablement of online access is given in this document.

Details of open positions (if any) will also be communicated to the client along with contract expiry information within one hour of the freezing/blocking of the trading account. Further the process of re- enablement of online access to trading account will also be given in the email.

D. Unfreeze / Re-enablement:

Client can place a request for the reinstatement of online access by submitting a request to us from the registered email ID or a written request letter or by calling the above toll-free number.

Upon completing the necessary due diligence, including validating the authenticity of client's request to unfreeze/unblock/enable the online access of the trading account which includes call to the registered mobile number. The online access will be enabled and appropriate communication to this effect will be sent through email to clients registered email id and/or calling the registered mobile number of the client.

E. Maintenance of records:

We will maintain the records/logs of the request received to freeze/block and unfreeze/unblock the online access of trading account, confirmation given for freezing/blocking and unfreeze/unblock of the online access of the trading account and cancellation of pending orders, if any, sent to the clients.

This policy forms integral part of our Policies and Procedures document and is available on our website and can be accessed using the below link.