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Policy for providing the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities.

Preamble

As per requirements of SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 on 'Ease of Doing Investments by Investors- Facility of voluntary freezing/ blocking of Trading Accounts by Clients, Industry Standards Forum in consultation with the Exchanges issued Framework for Trading Members for providing the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities in NSE Circular reference no. NSE/INSP/61529 dated April 8, 2024 and BSE Circular 20240408-12 dated April 8, 2024.

The Neo Wealth Management Pvt Ltd (hereafter "NWMPL") provides Internet Based Trading and Mobile Trading. As per abovementioned Regulatory circulars, NWMPL provides following two modes of communications through which the client may request for voluntary freezing/ blocking the online access of trading account if any suspicious activity is observed in the trading account:

1. Email from registered e-mail ID
2. IVR/tele calling

NWMPL has dedicated e-mail Id 'stoptrade@neo-wealth.com' and contact no 022-66423606 for receipt of communication for voluntary freezing/ blocking of the online access of the clients' trading account.

NWMPL is taking following actions on the receipt of request through any modes of communications for freezing/blocking of the online access of the trading account from the client:

- a. Validating the request is received from the client –
 - Verifying whether request is received from the registered phone number/e-mail Id of the client; or
 - Where request is received from other than registered phone number/e-mail Id of the client, NWMPL have a client authentication procedure (2 Factor Authentication) or
 - Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time.
- b. On the receipt of the client request, NWMPL will issue the acknowledgement email /SMS to clients registered email id/Phone no.
- c. NWMPL will freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the said client.
- d. 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 start of trading.	Before the start of next trading session



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Note: Trading hours shall be as follows:

1. 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
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.
 - e. Post freezing/blocking the client's trading account, NWMPL shall send a communication on the registered mobile number and registered e-mail ID of the client confirming 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
 - f. With the confirmation email NWMPL will share the process of re-enablement for getting the online access to the trading account.
 - g. NWMPL will communicate details of open positions (if any) 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.

The NWMPL maintains 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.

NWMPL 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.