

Elara Securities (India) Private Limited

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POLICY & FRAMEWORK FOR VOLUNTARY FREEZING / BLOCKING THE ONLINE ACCESS OF THE TRADING ACCOUNT BY CLIENTS ON ACCOUNT OF SUSPICIOUS ACTIVITIES

1. Preamble:

Elara Securities (India) Private Limited (hereinafter referred to as ELARA or "the Company") is a company registered under the provisions of the Companies Act 1956 and is a SEBI registered Stock Broker having SEBI REGISTRATION NO.: INZ000238236, Member of BSE Limited (CM) and National Stock Exchange of India Limited (CM, F&O); a Depository Participant (CDSL): IN-DP-370-2018 and a SEBI registered Research Analyst: INH000000933.

2. Policy Description & Purpose:

This policy is framed as a part of risk management policy for providing facility of voluntary freezing/blocking the access of the trading accounts of the clients on account of suspicious activities.

3. Applicability:

As a part of online trading facility, ELARA provides following services:

- Internet Based Trading (IBT)
- Security Trading through Wireless Technology (STWT)

4. Process For Voluntary Freezing/ Blocking the Online access of the Trading Account:

- A. In case of any suspicious activity being observed by client, the client can raise a request for voluntary freezing / blocking the online access of the Trading Account, by intimating through following modes:
 - Sending an e-mail on <u>stoptrade@elaracapital.com</u> from registered e-mail id.
 - 2. Web link: https://elarasecurities.com/freeze-ac/
 - 3. Calling on +91 22 42048605 / +91 22 42048605 / +91 22 42048617
- B. On receipt of request from client, the request will be validated to ensure that the request placed is a genuine one.
- C. After validation of the request, acknowledgement will be provided to the client and online access of the client's trading account will be freezed /blocked and all the pending orders will be cancelled.
- D. The Confirmation of the freezing/blocking of the clients trading account will be sent on the registered mobile number and e-mail id of the client.
- E. The details of open positions (if any) will also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account.
- F. ELARA 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.

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

¹Trading 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 the next six months after the date of its applicability to enhance protection of investors from suspicious activities.

6. Re-enabling the client for online access of the trading account:

The online access of trading account will be reenabled after carrying out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account. The process for re-enablement is as under:

- A. Client can raise a request for voluntary freezing / blocking the online access of the Trading Account, by intimating through following modes:
 - Sending an e-mail on stoptrade@elaracapital.com from registered e-mail id.
 - Calling on +91 22 42048605 / +91 22 42048608 / +91 22 42048617
- B. On receipt of request from client, the request will be validated to ensure that the request placed is a genuine one.
- C. After validation of the request, acknowledgement will be provided to the client and online access of the client's trading account will be unfreezed /unblocked.
- G. The Confirmation of the unfreezing/unblocking of the clients trading account will be sent on the registered mobile number and e-mail id of the client.
- 7. In case of failure of ELARA in freezing/ blocking the online access within the prescribed timelines, ELARA will be responsible for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.