

MATHRAN SECURITIES PRIVATE LIMITED

Policy for Voluntary Freezing or Unfreezing of the Trading Accounts by Clients

INTRODUCTION / BACKGROUND

Mathran Securities Private Limited (hereinafter referred to as "Mathran Securities") provides trading and investment services to its clients. As a responsible financial intermediary and in compliance with regulatory standards, the company implements robust frameworks to protect investor assets and maintain market integrity.

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/unfreezing of Trading Accounts by Clients", the Industry Standards Forum, in consultation with the Stock Exchanges, issued a Framework for Trading Members. This framework mandates providing a facility for voluntary freezing or blocking of online access to the trading account to clients on account of suspicious activities, as notified under NSE Circular reference no. NSE/INSP/61529 dated April 8, 2024 and BSE Circular 20240408-12 dated April 8, 2024.

SCOPE

This policy shall be applicable as and when clients are required to freeze / block online access to their trading account and subsequently desire to unfreeze the same. Mathran Securities provides Internet Based Trading (IBT) Systems and Mobile Trading Applications. In accordance with the aforementioned regulatory circulars, Mathran Securities provides secure modes of communication through which clients may request voluntary freezing/unfreezing of online access if any suspicious activity is observed.

FRAMEWORK FOR VOLUNTARY FREEZING OF TRADING ACCOUNT

Clients can raise requests for blocking/freezing of their trading account due to suspicious transactions through the following mediums:

- Trading Application / Mobile App:** Clients can raise a direct freeze request through the Mathran Securities trading application or Mobile Trading App. Once the request is raised, the account will be frozen immediately, thereby disabling online trading access for both internet-based trading and mobile platforms.
- Email Communication:** Clients can send an email to the dedicated email ID **mathranar@gmail.com** from their registered email address.

Verification & Authentication: Mathran Securities shall validate that the "block / freeze request" is received from the registered email ID of the client. If a request is received from an unregistered email ID, Mathran Securities shall strictly validate the client's identity through a robust client authentication procedure (such as 2-Factor Authentication) before execution.

TIMELINES FOR FREEZING & ACKNOWLEDGEMENT

The strict turnaround timelines for processing freeze requests and issuing acknowledgements are as under:

Scenario	Timelines for Issuing Acknowledgment & Freezing/Blocking Access
Request received during trading hours and within 15 minutes before the start of trading.	Within 15 minutes
Request received after trading hours and more than 15 minutes before the start of the next trading session.	Before the start of the next trading session

CLIENT COMMUNICATION & CANCELLATION OF ORDERS

- **Cancellation of Orders:** All pending orders of the client shall be completely cancelled before blocking/freezing the online access to the trading account.
- **Immediate Notification:** Mathran Securities shall promptly notify the client via their registered mobile number and email confirming that their online access has been frozen/blocked and that all pending orders have been cancelled, along with instructions on how to re-enable access.
- **Open Positions Report:** Mathran Securities will communicate the client's open positions (if any) and contract expiry details within one hour from the successful freezing/blocking of the trading account.

FRAMEWORK FOR VOLUNTARY UNFREEZE OF TRADING ACCOUNT

When a client desires to restore access after carrying out necessary rectifications or ensuring account security, they can initiate an unfreeze process:

- Clients can raise requests to unfreeze/unblock their trading account by sending an email to **mathranar@gmail.com** from their registered email address.
- The email request must include essential trading account details for identification, specifically: Unique Client Code (UCC), PAN, and Date of Birth (DOB).
- Mathran Securities will conduct thorough due diligence, including validating that the "unfreeze request" originates from the registered email ID and verifying the authenticity of the client.
- Mathran Securities will re-enable the online access of the trading account only after successfully completing this necessary due diligence. Clients will be officially informed via email regarding the status/completion of their request.

Important Points to Note:

1. Freezing/blocking is strictly restricted to the **online access** of the client's trading account; there shall be no restrictions on the Risk Management activities of Mathran Securities Private Limited.
2. The request for voluntary freezing/blocking does not constitute a request for marking the client's Unique Client Code (UCC) as inactive in the Stock Exchange records.
3. Mathran Securities maintains all electronic logs of freeze and unfreeze requests, alongside all formal communications sent/received, to serve as a comprehensive audit trail.

4. The process of freezing, unfreezing, and issuance of communications shall adhere strictly to the timelines specified by SEBI and the Stock Exchanges.

| POLICY COMMUNICATION

This policy shall be made an integral part of the Account Opening Form/Kit under the heading "Policy for Voluntary Freezing or Unfreezing of Trading Accounts by Clients" within the Policy and Procedures document, and shall also be conspicuously displayed on the Mathran Securities official website.

| REVIEW

The policy will be reviewed and updated as required to incorporate any subsequent amendments or changes introduced by regulatory authorities. Additionally, it will undergo periodic internal reviews to ensure its continued relevance, effectiveness, and alignment with current regulatory frameworks and industry standards.