



FACILITY OF VOLUNTARY FREEZING/BLOCKING OF TRADING ACCOUNT BY CLIENTS POLICY

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| 1.0 | Facility of voluntary freezing/ blocking of Trading Accounts by Clients | IT Dept. | GM - IT | Director IT | GM - IT | 28.06.2024 |

All queries, suggestions and changes required may be emailed srinivas.v@steelcitynettrade.com

1. OVERVIEW

This is with reference to SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, and Exchange Circular no. NSE/INSP/60277 dated January 16, 2024, on the subject “Ease of Doing Investments by Investors - Facility of voluntary freezing/ blocking of Trading Accounts by Clients”.

Both NSE and BSE had issued the circulars bearing reference no NSE/INSP/61529 and 20240408-12 respectively detailing the framework to be adopted by the Steel City Securities Limited is to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities as finalized in accordance with SEBI Circular.

2. Modes of Accepting the Voluntary Freezing Request

Steel City Securities Limited providing internet-based trading/ mobile trading/ other online access for trading shall make available to the clients at least two modes of following 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: -

- a) Email from registered Email ID
- b) SMS from registered mobile number
- c) IVR/tele calling
- d) Chatbot
- e) Steel City Securities Limited/s App / Website
- f) Any other legally verifiable mechanism

Freeze Account Request from Online Trading Portal:

To introduce a new feature of freezing online trading access in the mobile app and trading website under Profile Section. Process flow is detailed below –

- If a client wishes to choose this option (Freeze my account), the client will be prompted to a confirmation screen where the resultant actionable are stated in a text format.
 - Upon proceeding and clicking on Submit, client will be redirected to the OTP Page wherein he/she must enter and validate the OTP which will be sent to the registered
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email id and registered mobile number.

- After successful validation, the online trading access will be blocked for the client and a message notification will be triggered to the Admin User/s.
- The Admin User can take appropriate action for the respective client viz., cancellation of pending orders via Admin Terminal or through a Dealer.
- The same information will also be made available via a report in the Admin Terminal via download for client communication of open positions and other information.
- Details of open positions (if any) should be communicated to client by the Steel City Securities Limited along with contract expiry information within the stipulated time from freezing/blocking of the trading account.

Member must ensure the following if the account freeze request is received from other eligible modes-

- a) Where an Email ID and/or telephone number is provided by the Steel City Securities Limited for this purpose, the said Email ID/ telephone number should be dedicated for receipt of communication for voluntary freezing/ blocking of the online access of the clients' trading account. The nomenclature of dedicated Email Id shall be stoptrade@steelcitynettrade.com
- b) Validate that the request is received from the client and issue the acknowledgement as well as freeze/block the online access of the client's trading account
- c) Simultaneously cancel all the pending orders of the said client.
- d) Timelines for issuing acknowledgement as well as freezing/blocking of the online trading account should be according to the details mentioned in the above circulars on this subject.
- e) Details of open positions (if any) should also be communicated to client along with contract expiry information within the stipulated time from freezing/blocking of the trading account.

3. Options Available in Trading App for Blocking / Freezing-

- After the request for freezing the account is duly authenticated, Steel City Securities Limited should cancel the pending orders from the order book for the respective client as mentioned in the circular.
 - Post cancellation of outstanding orders, Steel City Securities Limited can either flag this client as OFFLINE or DISABLE or SUSPEND the client from the ADMIN PANEL from the client master window.
 - If the Steel City Securities Limited wants to remove the online trading facility, disable or suspend the clients in bulk, they can do so via a bulk file upload.
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- If the client is flagged as an OFFLINE, online trading access will be blocked. However, the client will be able to login and view his/her watch-list, holdings etc. but will not be able to PLACE/MODIFY any order. But a Dealer/Admin will be able to place orders on behalf of their clients.
- A client in DISABLED status will be able to login to the trading account but will not be able to transact. If the client is in SUSPENDED status, will not be able to login to the trading application itself. For a client who is in DISABLED or SUSPENDED status, even Dealer and ADMIN will NOT be able to place orders for them.

Steel City Securities Limited shall 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.