

POLICY ON EASE OF DOING INVESTMENTS BY INVESTORS-FACILITY OF VOLUNTARY FREEZING/ BLOCKING OF TRADING ACCOUNTS BY CLIENTS

TAURUS CORPORATE ADVISORY SERVICES LIMITED.

Member: NSE, BSE, MCX, MSEI, CDSL

Company	Registered as	Member of	SEBI Reg. No.
Taurus Corporate Advisory Services Limited	Stock Broker	NSE, BSE, MSEI, MCX	The state of the s
	Depository Participant	CDSL	IN-DP-646-2021
	Merchant Banker	SEBI	MB/INM000011740

Date of implementation: 10/04/2024

· OBJECTIVE:

This policy is framed with the objective of bringing ease in doing investments by Investors in adherence to the SEBI circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and various circulars provided by the Exchanges in support thereof.

The major purpose of the policy as cited by SEBI is to stop suspicious activities in the trading accounts of the investors and an immediate facility to be provided to them to freeze the accounts to avoid/curb any potential losses

The objective is to

- to provide the facility of voluntary freezing/blocking the online access of the trading account
 to our clients through various modes; on account of suspicious activities
- Action to be taken by the Trading Member pursuant to the receipt of request for freezing/blocking of the trading account
- 3. Process for re-enabling the client for trading/transfers
- Intimation to be provided by the trading member to the clients w.r.t. introduction of the facility to block the trading accounts

· SCOPE:

The above mentioned SEBI circular mandated trading members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities. The said circular also requires the trading members to frame a policy in line with the framework specified by the Exchanges, which shall be the part of the Taurus Group's Risk Management Policy. The said policy has been disclosed on our website www.taurusgrp.com. The said policy shall also



form a part of the account opening kit for all new clients on boarded with effect from July 01, 2024.

FRAMEWORK FOR VOLUNTARY FREEZING OF ONLINE ACCESS OF CLIENT'S TRADING ACCOUNT

1. Mode of Communication

Investors using internet based trading/ mobile trading/ other online access for trading can opt for voluntary freezing of their respective accounts by any of the following modes:

- a. email from registered e-mail ID
- sms from registered mobile number
- telephonic call

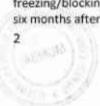
The dedicated email id as suggested by NSE vide Circular no. NSE/INSP/61529 dated April 08, 2024 is stoptrade@taurusgrp.com

2. Action to be taken

a. On receipt of the request from the client for Freezing their trading account as mentioned above, our team needs to send an acknowledgement to the client vide the same mode and freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the said client. 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

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.



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.



b. Communication with client

Post freezing/blocking the client's trading account, send a communication on the registered mobile number and registered e-mail ID 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 along with the process of re-enablement for getting the online access to the trading account

c. Open Positions

Details of open positions (if any) should also be communicated 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. 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

Verification of request received

The Trading Member shall have a mechanism in place to validate that the request for freezing/blocking of the online access of the trading account is received from the respective client only.

This can be done by

- a. The team has to verify 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. This can be done vide client authentication procedure (2 Factor Authentication)
- the Trading Member should have a client authentication procedure (2 Factor Authentication) in place
- Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time

4. Records/log

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, unfreezing/unblocking if any, sent to the clients, need to be maintained

5. Effect of failure

In case of failure of by us in freezing/ blocking the online access within the prescribed timelines (15 minutes in case the request is received during the trading hours and within 15 minutes before the start of trading / Before the start of the next trading session in case the request is received after the trading hours and 15 minutes before the start of the trading), Taurus shall be responsible for any trades executed from the time of receipt of such request till such time the online access is blocked / frozen.



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

Taurus 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.

This due diligence would be in terms of any checking if any unauthorised trades were done form the respective client's account, receiving communication vide any of the modes as mentioned above, from the client to the effect to unfreeze the said account

7. Clarification

It is further clarified that

- a. freezing/blocking is only for the online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of the Trading Member.
- The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records

The compliance officer or a person appointed by him as such would periodically review this policy and would ensure its compliance along with the accounts department.

Details of key personnel:

Sr. No.	Particulars	KMP-1	KMP-2	
01.	Designation	Principal Officer	Compliance Officer	
02.	Name	Mr. Mihir Mehta	Ms. Deepali Vartak	
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