CIN: U65990KA2022PTC164941
Email Id: connect@goldenpi.com
Phone No: 080-45685666
www.goldenpi.com

**GoldenPi Securities Private Limited**

**Policy for voluntary freezing/ blocking the online access of the trading account**

This Policy is in line with SEBI circular ref. no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 regarding Ease of Doing Investments by Investors- Facility of voluntary freezing/ blocking of Trading Accounts by Clients and subsequent circulars issued by BSE being numbered 20240408-12 dated April 08, 2024.

**Purpose**

The procedures outlined herein are per regulatory requirements in the aforementioned circulars. All clients are requested to note that the guidelines are issued to facilitate the freezing/blocking of their respective online trading accounts upon explicit requests from the client's end in case they notice any suspicious activity on their trading accounts.

A few instances of suspicious activities would include:

- Transaction being taken without the client's knowledge or action.
- A client is unable to access his/her account.
- A client notices a change in their linked bank account/ email/ mobile number without them having placed a request.

**Procedure to Freeze/Block the Online Trading Account**

**a) Timelines**

In line with regulatory requirements, upon the explicit request from a client to block the online access to their trading account through any of the modes mentioned in the forthcoming sections, all efforts will be taken by GSPL Personnel to fulfill the request as per the below timelines:

a. For requests received within trading hours, all efforts shall be taken to block the account within 15 min.

b. For requests received after trading hours and 15 minutes before the market opening time, all efforts will be taken to block the account before the start of the next trading session.

**b) Mediums**

Clients can report suspicious activities on their trading account via the following mediums:

a. By mailing on the dedicated email ID: stoptrade@goldenpi.com

b. By calling the dedicated number: **080-45685666** (between 9:00 am and 6:30 pm)

**c) Verification (Mandatory)**

a) Requests raised on calls
   - Clients should call the dedicated number, **080-45685666,** from their registered phone numbers (number registered with GSPL).
   - Please note that stringent identity verification will be conducted before considering any client's block requests. Hence, all clients are requested to keep all basic Personal Identification Information handy to facilitate the smooth and fast processing of requests.

b) Requests raised via dedicated Email
   - Clients are recommended to mail from their registered email address (email ID registered with GSPL).
   - Clients are requested to give relevant and detailed information regarding the suspicious activity they have noticed on their trading accounts.

### 3.4 Basic Checks & Initial Steps (Mandatory)

GSPL would ask a series of questions (basic checks) to understand the gravity of any request received. These queries would relate to the existing positions in the client's account, inadvertent sharing of login credentials, OTPs, orders, devices used for trading, etc.

Clients are requested to kindly cooperate with the GSPL personnel and furnish all the information required, as this is essential for assessing the situation of the trading accounts.

GSPL's authorized personnel shall communicate to the client the details of the client's existing open positions. Subsequently, the personnel will solicit input from the client regarding their preferred course of action for these positions. Upon the client's directive and subject to successful authentication of the client, GSPL will proceed to cancel all open orders. In such instances, applicable call and trade charges will be imposed.

Clients are requested to make an informed decision based on these suggestions and communicate their decisions clearly and unequivocally so that the GSPL personnel can proceed with the blocking/freezing of their trading accounts.

Following the basic checks, a ticket would be created (if not already raised) against the client's request and all responses would be made note of. Clients would receive all further updates on their requests via the ticket thus created.

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GSPL 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

**Procedure to Unfreeze/Unblock the Online Trading Account**

- Clients can unfreeze/unblock their online trading accounts by raising a request via any of the modes prescribed herein above.
- The client must mandatorily complete the Re-KYC procedure successfully to have their trading account unfrozen/unblocked.
- Following the successful completion of the Re-KYC procedure and after carrying out any other necessary due diligence, the client shall be intimated via ticket/mail regarding the status of their request.

**Clarifications**

It is clarified that:

a. Freezing/blocking is only for online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of GSPL.

b. The request for freezing/blocking does not constitute a request for marking the client's Unique Client Code (UCC) as inactive in the Exchange records.

**Periodic Review**

This document essentially helps curb clients' risk and hence forms an integral part of GSPL's internal Risk Management Policy. As such, it shall be reviewed once a year unless an earlier review is necessary to ensure that the policy remains updated as per regulatory changes.

**Effective Date**

This policy has been adopted vide Company's Board of Directors' resolution dated 01/03/2025. This policy shall stand applicable organization wide with effect from 01/03/2025. This policy shall be subject to review from time to time