

1. Introduction

This policy has been drafted as per the 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”*.

Accordingly, this document has been derived from the framework presented by the exchange in response to the aforementioned circulars, via the Exchange Circular no.: [NSE/INSP/61529](#) dated April 08, 2024 on the subject: *“Framework for Trading Members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients”*.

This document is a handbook for the clientele of Money palm Brokers Private Limited (*hereinafter referred to as Money palm*), outlining the process and mode(s) through which they can request to freeze / block & unfreeze/unblock their trading account. Other details, such as the timelines, clients' onuses, etc., to facilitate the same are also mentioned.

2. Purpose

The procedures outlined herein are per regulatory requirements in the aforementioned circulars. All clients are requested to note that the forthcoming 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:

- Fresh positions being taken without the client's knowledge or action.
- Holdings being sold 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.
- A share transfer via gift/ easiest is initiated without the client's knowledge or action.

3. Scope and Applicability

The policy statements written in this document apply to all of Money palm's resources at all levels of sensitivity; including:

- All the clients of Money palm.
- All employees who are part of the relevant teams at Money palm.

4. Periodic Review

This document essentially helps curb clients' risk and hence forms an integral part of Money palm's internal Risk Management Policy. As such, it shall be reviewed every half year unless an earlier review is necessary to ensure that the policy remains updated as per regulatory changes. Changes to this policy shall be exclusively performed by the document owner and approved by Management. A change log shall be kept current and updated as soon as any change has been made.

5. 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 Money palm Personnel to fulfill the request as per the below timelines:

- For requests received within trading hours, all efforts shall be taken to block the account within 15 min.
- For requests received after trading hours up until 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:

- ❖ By mailing on the dedicated email ID: stoptrade@Money palm.in
- ❖ By calling the dedicated number: **91-0124-4307804** (between 8:30 am and 5:00 pm)

c) Verification (Mandatory)

A. Requests raised on calls

- Clients should call the dedicated number, **91-0124-4307804**, from their registered phone numbers (number registered with Money palm).
- 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(PII) 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 Money palm).
- Clients are requested to give relevant and detailed information regarding the suspicious activity they have noticed on their trading accounts.

6. Request for Un-freezing

- Client may request for unfreezing / unblocking the online access to their trading account through any one of the following modes that shall be made –
 - Phone No. - 91-0124-4307804
 - Email - stoptrade@money palm.in
- An email acknowledgement shall also be sent to the client informing him / her of the unfreeze request and the date by which online access shall be activated.

Important points

- All logs of freeze and unfreeze request and communications sent shall be maintained for audit trail.
- 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. The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.
- This policy shall be informed to all clients and shall also be a part of the account opening kit for all accounts opened with effect from July 01, 2024
- The freeze, unfreeze, issue of communication shall be within the timelines specified by SEBI / Exchanges in this regard.