

**Policy on framework for Trading Member to provide the facility of
voluntary freezing/ blocking the online access of the trading account to their client
on account of suspicious activities, this forms a part of the Risk Management Policy**

1. The framework for Wellworth Share and Stock Broking Ltd. (TM) for providing the facility of voluntary freezing/ blocking the online access (WellTrade) of the trading account to the clients on account two modes of the following communications through which the client may request for voluntary freezing/ blocking the online access of trading account in any suspicious activity is observes in the trading account:
 - a) Email from registered email ID
 - b) Call from registered mobile number on the dedicated number

The dedicated Phone No's and Email are as follows:

Dedicated land Line No.: 022 6715 9077
Email ID: stoptrade@rohawellworth.com

2. Wellworth Share and Stock Broking Ltd. (TM) shall take the following action on the receipt of request through the mentioned modes of communications for freezing/ blocking of the online access of the trading account from the client:
 - a. Validated that the request is received from the client through the two mentioned modes of communication and issue the acknowledgement as well as 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 and within 15 minutes before the start of trading	Within 15 Minutes
Request received after the trading hours and 15 minutes before the start of trading	Before the start of next trading session

- b. List freezing/blocking the clients' trading account, Wellworth Share and Stock Broking Ltd. (TM) shall send a communication on the registered mobile number and registered email ID of the clients, stating that the online access to the trading account has been frozen/ blocked and all the pending order 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. Details of open position (if any) shall also be communicated to the client along with contract expiry information within one hour from the freezing/ blocking of the trading account.

3. Wellworth Share and Stock Broking Ltd. (TM) has a mechanism in place to validate the request for freezing/ blocking of the online access of the trading account received from the respective client only. This can be done by Wellworth Share and Stock Broking Ltd. (TM) by:
 - a) Verifying whether request is received from the registered phone number/ email id of the client; or where request is received from other than registered phone number/email of the client, the Wellworth Share and Stock Broking Ltd. (TM) has a client authentication procedure (2 factor authentication) in place.
4. Wellworth share and Stock Broking Ltd. (TM) 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.
5. Re-enabling the client for online access of the trading account:- Wellworth Share and Stock Broking Ltd. (TM) 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.
6. It is clarified that:
 - a. Freezing/ blocking is only for the online access to the client's trading account, and there shall no restrictions on the Risk Management activities of the Trading Member.
 - b. The request for freezing/ blocking does not constitute request for making client unique client code (UCC) as inactive in the Exchange records.
7. Wellworth Share and Stock Broking Ltd. (TM) shall disclose on their website, the policy along with the process and mode(s) through which the client can place the request to freeze/block and unfreeze/ unblock the trading account along with the timelines that will be followed by the Wellworth Share and Stock Broking Ltd. (TM) for the same.