

**Sushil Financial Services Private Limited**  
**Policy for Voluntary Freezing/Blocking of the**  
**Online Trading Account on Suspicious Activity**

**1. Introduction**

This policy has been introduced as per SEBI Circular no. SEBI/HO/MIRSD/POD-1/P(CIR/2024/4 dated January 12, 2024, NSE Circular no. NSE/INSP/61529 dated April 08, 2024, BSE circular no.20240408 – 12 dated April 08,2024, regarding the "Ease of Doing Investments by Investors - Facility of voluntary freezing/blocking of Trading Accounts by Clients."

This policy outlines the process and modes for clients of Sushil Financial Services Private Limited (hereinafter referred to as SFSPL), to request the freezing/blocking and unfreezing/unblocking of their online trading account. It also details the timelines, client responsibilities, and other pertinent information.

**2. Purpose**

The procedures outlined herein are as per the regulatory requirements in the aforementioned circulars. Clients are requested to note that these guidelines facilitate the freezing/blocking of their online trading accounts upon their explicit request if they notice any suspicious activity, such as:

- Unauthorized fresh positions
- Unauthorized sale of holdings
- Inability to access the account
- Others – Please specify

**3. Scope and Applicability**

This policy applies to All Online Clients of SFSPL.

**4. Periodic Review**

This policy, being an integral part of SFSPL internal Risk Management Policy, shall be reviewed annually or as needed to remain updated with requirement of regulatory changes. Changes to this policy will be made and approved by Management.



## 5. Procedure to Freeze/Block the Online Trading Account

### 5.1 Timelines

Upon a client's explicit request to block online access to their trading account through any of the modes mentioned below in section 5.2. SFSPL personnel will aim to fulfill the request as follows:

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 mins before start of trading.	Within 15 Mins
Request received after the trading hours and 15 min before the start of trading	Before the start of next trading session

### 5.2 Mediums

Clients can intimate about the freezing/blocking via:

a. **Email:** [stoptrade@sushilfinance.com](mailto:stoptrade@sushilfinance.com)/[etrade@sushilfinance.com](mailto:etrade@sushilfinance.com)

b. **Phone:** 022- 40934032/40934094/40934095 (8:30 am - 5:00 pm)

### 5.3 Verification

a. **Calls:** Client request should come from its registered mobile number.

b. **Email:** Client should send email from its registered email id and provide information about the nature of suspicious activity.

### 5.4 Basic Checks & Initial Steps

SFSPL personnel will conduct basic checks as a part of the due diligence. Client must cooperate and provide the necessary information as demanded, in order for them to consider & proceed with the request.

Upon successful verification of the client after understanding the reasons for Blocking/Freezing, SFSPL based on such instruction received from the client will act in accordance and will send a communication on registered mobile number and registered email id of the client stating that the online access to the trading account has been frozen/blocked and all pending orders in the client's trading account, if any, have been cancelled.



### **5.5 Liability Wavier**

Any losses or charges, if any, incurred due to the cancellation of open orders or positions will have to be borne by the client.

### **6. Procedure to Unfreeze/Unblock the Online Trading Account**

Clients can unfreeze/unblock their trading accounts by raising a request via any of the modes prescribed in section 5.2. and clients will be informed of their request status accordingly.

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