



## Policy for Voluntary Freezing or Unfreezing of the Trading Accounts by Clients.

LGT Capital Markets Private Limited

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## INTRODUCTION/ BACKGROUND

**LGT Capital Markets Private Limited** (hereinafter referred to as "LGT Capital") is incorporated under the Companies Act, 2013, with Corporate Identification Number (CIN) U66120MH2024PTC418285. LGT Capital is a SEBI-registered Stock Broker with registration number INZ000319637. It is a Trading Member of BSE Limited (BSE) with membership code 6877 and National Stock Exchange of India Limited (NSE) with membership code 90395. Further, LGT Capital is also SEBI registered Depository Participant of CDSL with registration number IN-DP-793-2025.

## PREAMBLE

As per requirements of SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 on Ease of Doing Investments by Investors- Facility of voluntary freezing/ unfreezing of Trading Accounts by Clients, Industry Standards Forum in consultation with the Exchanges issued Framework for Trading Members for providing the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities in NSE Circular reference no. NSE/INSP/61529 dated April 8, 2024 and BSE Circular 20240408-12 dated April 8, 2024.

## SCOPE

This policy shall be applicable as and when clients are required to freeze / block online access to their trading account and subsequently desire to unfreeze the same.

LGT Capital Markets Private Limited provides Internet Based Trading (IBT) System and Mobile Trading App. As per above mentioned Regulatory circulars, LGT Capital Markets Private Limited provides the following modes of communications through which the client may request for voluntary freezing/ unfreezing of the online access of the trading account if any suspicious activity is observed in the trading account.

As per the regulatory requirement, LGT Capital Markets Private Limited shall provide the facility of voluntary freezing/blocking of online access to trading accounts for clients in cases of suspicious activities.

Clients can raise requests for blocking/freezing of their trading account due to suspicious transactions through the following mediums:

- 1) Client can raise a request through the LGT Capital Markets Private Limited's trading application/Mobile Trading App.
  - Once the request is raised by the client, account will be frozen thereby disabling the online trading access to the client for both internet based trading and mobile Trading.
- 2) Client can email at stoptrade@lgtindia.in from their registered email ID. LGT Capital Markets Private Limited has provided a dedicated e-mail id stoptrade@lgtindia.in for receipt of communication for voluntary freezing/blocking of online access of their accounts.
  - LGT Capital shall validate that the "block / freeze request" is received from the registered email ID of the client.
  - LGT Capital shall validate the client's identity through the client authentication procedure (2-Factor Authentication) if the request is received from any unregistered email ID.

The timelines for freezing/ blocking the online access of the client's trading account is as under:

<b>Scenario</b>	Timelines for issuing acknowledgment as well as Freezing/blocking of the online access of the trading account.
<b>Request received during the trading hours and Within 15 minutes before the start of trading.</b>	Within 15 minutes
<b>Request received after the trading hours and 15 Minutes before the start of trading.</b>	Before the start of the next trading session

Cancellation of orders; All pending orders of the client shall be cancelled before blocking/freezing the trading account.

#### CLIENT COMMUNICATION ON CANCELLATION OF ORDERS

- LGT Capital shall notify the client via registered mobile number and email that their online access has been frozen/blocked, and all pending orders have been cancelled, along with details on how to re-enable their access to the trading account.
- LGT Capital will communicate the client's open positions (if any) and contract expiry information within one hour from the freezing/blocking of the trading account.

#### FRAMEWORK FOR VOLUNTARY UNFREEZE OF ONLINE ACCESS OF CLIENTS TRADING ACCOUNT

- Clients can raise requests to unfreeze/unblock their trading account through email from the client's registered email id. The Client also has the option to Unfreeze the online access by sending an email to stoptrade@lgtindia.in from registered email address, including trading account details (UCC, PAN, and DOB).
- LGT Capital will complete due diligence including validating the client request to unfreeze/unblock the trading account. LGT Capital shall validate that the "unfreeze request" is received from the registered email ID of the client.
- Clients will be informed via email about the status of their request after completing the due diligence process.

#### FRAMEWORK FOR VOLUNTARY UNFREEZE OF ONLINE ACCESS OF CLIENTS TRADING ACCOUNT

Important Points:

- 1) 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 LGT Capital Markets Private Limited.
- 2) The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.
- 3) LGT Capital Markets Private Limited maintains all logs of freeze and unfreeze request and communications sent shall be maintained for audit trail.
- 4) LGT Capital Markets Private Limited will 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.
- 5) The freeze, unfreeze, issue of communication shall be within the timelines specified by SEBI / Exchanges in this regard.

#### POLICY COMMUNICATION

The said policy shall be made part of the Account Opening Form/Kit under heading "Policy for Voluntary Freezing or Unfreezing of Trading Accounts by Clients " of Policy and Procedures document and shall also be displayed on the LGT India website.

## REVIEW

The policy will be reviewed and updated as required to incorporate any changes introduced by regulatory authorities. Additionally, it will undergo periodic reviews to ensure its continued relevance, effectiveness, and alignment with current regulatory requirements and industry standards.