GOODFLOW SECURITIES PRIVATE LIMITED

POLICY FOR VOLUNTARY FREEZING / BLOCKING OF ONLINE ACCESS TO TRADING ACCOUNT

1. INTRODUCTION

Goodflow Securities Private Limited ("Goodflow" / "Company" / "Trading Member") is a registered Stock Broker and Trading Member of the recognised Stock Exchanges.

This Policy has been framed pursuant to the requirements prescribed by the Securities and Exchange Board of India ("SEBI") vide 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/blocking of Trading Accounts by Clients" and the subsequent framework prescribed by the Stock Exchanges.

The purpose of this Policy is to provide clients with a facility to voluntarily freeze/block the **online access** to their trading account where the client observes or suspects any unauthorised or suspicious activity in the account.

This Policy forms part of the Risk Management Policy of Goodflow Securities Private Limited.

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2. SCOPE

This Policy shall apply to all clients of Goodflow who have been provided internet-based trading, mobile trading or any other online access facility to their trading account.

The facility is intended to enable clients to promptly restrict online access to their trading account in case of suspected unauthorised or suspicious activity.

The facility shall be available in respect of the applicable segments in which the client is registered with Goodflow, including Equity, Equity Derivatives, Currency Derivatives and Commodity Derivatives, as applicable.

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3. MODES OF REQUEST FOR FREEZING / BLOCKING

A client may request voluntary freezing/blocking of online access to the trading account through the following modes made available by Goodflow:

A. Email

The client may send a request from his/her/its **registered email ID** to the dedicated email ID:

[grievance@goodflowsecurities.com]

The subject line should preferably be:

"FREEZE/BLOCK MY TRADING ACCOUNT – PAN ____________"

B. Other approved electronic mechanism

Goodflow may additionally provide the facility through its mobile application, website, chatbot, SMS or any other legally verifiable mechanism, subject to the applicable regulatory requirements.

Goodflow shall provide at least two permissible modes of communication for submitting requests for voluntary freezing/blocking.

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4. INFORMATION TO BE PROVIDED BY THE CLIENT

The client should provide, to the extent applicable:

- Client Name;
- Trading Account / Client ID;
- PAN;
- Registered Mobile Number;
- Registered Email ID; and
- Reason for requesting freezing/blocking, if the client wishes to provide the same.

The client is not required to provide detailed information regarding the suspicious activity before the account is frozen/blocked.

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5. AUTHENTICATION / VALIDATION OF REQUEST

Goodflow shall have appropriate mechanisms to verify that the request for freezing/blocking has been received from the respective client.

The request may be validated by:

1. verifying that the request has been received from the client's registered mobile number or registered email ID; or

2. where the request is received through any other mode, carrying out appropriate client authentication, including two-factor authentication, wherever applicable; or
3. following such other authentication mechanism as may be prescribed by SEBI / Stock Exchanges from time to time.

Goodflow shall not act upon an unauthenticated request except in accordance with the applicable regulatory framework.

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6. ACKNOWLEDGEMENT AND FREEZING / BLOCKING

Upon receipt and validation of a valid request, Goodflow shall:

- issue an acknowledgement to the client;
- freeze/block the online access to the client's trading account;
- simultaneously cancel all pending orders of the client, if any; and
- communicate the status of the account to the client.

Timelines

Request received	Action by Goodflow
During trading hours or within 15 minutes before commencement of trading	Acknowledgement and freezing/blocking shall be completed **within 15 minutes**
After trading hours and more than 15 minutes before commencement of the next trading session	Acknowledgement and freezing/blocking shall be completed **before commencement of the next trading session**

The above timelines shall be subject to any modification prescribed by SEBI / the Stock Exchanges from time to time.

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7. CANCELLATION OF PENDING ORDERS

Upon freezing/blocking of the online access to the trading account, Goodflow shall simultaneously cancel all pending orders of the client, wherever applicable.

The client shall be informed that the pending orders, if any, have been cancelled.

Orders that have already been executed before the freezing/blocking request shall not be treated as cancelled merely because the client subsequently requests freezing/blocking of the account.

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8. COMMUNICATION TO THE CLIENT

After freezing/blocking the online access, Goodflow shall send a communication to the client's:

- registered mobile number; and
- registered email ID,

confirming:

1. that online access to the trading account has been frozen/blocked;
2. cancellation of pending orders, if any;
3. details of open positions, if any; and
4. the process for re-enabling/unblocking the online access.

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9. OPEN POSITIONS

Freezing/blocking of online access shall not automatically close or liquidate the client's existing open positions.

Details of open positions, if any, shall be communicated to the client along with relevant contract expiry information **within one hour from freezing/blocking of the trading account**, as prescribed under the applicable framework.

The client shall remain responsible for applicable margin obligations and other obligations arising from existing positions.

Goodflow shall continue to undertake necessary risk management actions in accordance with its Risk Management Policy and applicable regulatory requirements.

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10. RISK MANAGEMENT ACTIVITIES

Freezing/blocking under this Policy is limited to the **online access** to the client's trading account.

Such freezing/blocking shall not restrict Goodflow from carrying out necessary risk management activities.

Accordingly, where required under applicable rules, regulations, contractual terms or Goodflow's Risk Management Policy, Goodflow may take necessary action in relation to the client's open positions, margins, settlement obligations or other risk management requirements.

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11. FREEZING / BLOCKING DOES NOT MEAN INACTIVATION OF UCC

A request for voluntary freezing/blocking of online access shall not be treated as a request to mark the client's Unique Client Code ("UCC") as inactive in the records of the Stock Exchange.

The client relationship and UCC shall continue to remain subject to applicable regulatory and operational requirements.

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12. RE-ENABLING / UNFREEZING OF TRADING ACCOUNT

A client wishing to restore online access to the trading account shall submit a request to Goodflow through the prescribed mode.

Goodflow shall carry out the necessary due diligence and validate the request before re-enabling the client's online trading access.

The client may be required to complete appropriate authentication, including two-factor authentication or any other authentication mechanism prescribed by Goodflow / SEBI / the Stock Exchanges.

Online access shall be restored only after satisfactory completion of the applicable verification process.

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13. CLIENT RESPONSIBILITIES

Clients are advised to:

- immediately report any suspected unauthorised or suspicious activity;
- keep their registered mobile number and email ID updated with Goodflow;
- keep their trading login credentials confidential;
- never share passwords, OTPs or authentication credentials with any person;
- regularly monitor their trading account, contract notes, trade confirmations and account statements; and
- promptly contact Goodflow if they notice any transaction or activity which they do not recognise.

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14. RECORD KEEPING

Goodflow shall maintain appropriate records/logs relating to requests for freezing/blocking and unfreezing/unblocking, including:

- date and time of receipt of request;
- mode through which request was received;
- client identification details;
- authentication/validation performed;
- date and time of freezing/blocking;
- acknowledgement issued;
- cancellation of pending orders;
- communication sent to the client;
- details of open positions communicated to the client; and
- date and time of re-enablement/unblocking, wherever applicable.

Such records shall be maintained for the period prescribed under applicable laws, regulations and regulatory requirements.

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15. FAILURE TO FREEZE/BLOCK WITHIN PRESCRIBED TIMELINE

Where Goodflow fails to freeze/block the online access within the prescribed timeline, Goodflow shall be responsible, in accordance with the applicable regulatory framework, for trades executed from the time of receipt of the valid request until the online access is actually frozen/blocked.

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16. GRIEVANCE REDRESSAL

For any grievance relating to voluntary freezing/blocking or re-enabling of the trading account, the client may contact Goodflow through its designated grievance redressal mechanism.

Grievance Email: grievance@goodflowsecurities.com

If the grievance is not resolved satisfactorily, the client may avail the applicable grievance redressal mechanisms available through the Stock Exchanges and SEBI, including the applicable online complaint resolution mechanisms.

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17. REVIEW OF POLICY

This Policy shall be reviewed periodically and shall be amended whenever required to ensure compliance with amendments, circulars, directions, guidelines and instructions issued by SEBI, NSE, BSE, MCX or any other applicable regulatory authority / Stock Exchange.

In case of any inconsistency between this Policy and any applicable statutory/regulatory requirement, the applicable statutory/regulatory requirement shall prevail.

18. PUBLIC DISCLOSURE

This Policy, together with the modes of communication available to clients for requesting freezing/blocking and unfreezing/unblocking of online access and the applicable timelines, shall be made available on the website of Goodflow Securities Private Limited.

The Policy shall also form part of the account opening documentation/kit for new clients as required under the applicable regulatory framework.

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