

MLB CAPITAL PVT LTD

CIN NO U67120DL1996PTC079292 / Sebi Single Regn. No. for Stock Broker : INZ000280737

Member : N S E : TM No. 14451 | Member: B S E : TM No. 6478

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Policy to provide the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities

(per requirements of SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024)

Following is the policy for providing the facility of voluntary freezing/ blocking the online access of the trading account to their clients on account of suspicious activities :-

1. We shall make available to the clients the following two modes of communications through which the client may request for voluntary freezing/ blocking the online access of trading account if any suspicious activity is observed in the trading account: -
 - a) Email from registered e-mail ID to stoptrade@mlbcapital.com
 - b) IVR/tele-calling on 011-45060605
2. We shall take the following actions on the receipt of request through any modes of communications as provided above for freezing/blocking of the online access of the trading account from the client:
 - a. Validate that the request is received from the client as per below point no. 4 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 ¹ and within 15 minutes before the start of trading.	Within 15 minutes ²
Request received after the trading hours and 15 minutes before the start of trading.	Before the start of next trading session

¹ Trading hours shall be as follows:

Capital Market Segment: 9.15 a.m. to 3.30 p.m., Equity Derivatives Segment: 9.15 a.m. to 3.30 p.m., Currency Derivatives Segment: 09.00 a.m. to 05.00 p.m., Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.

² To begin with, the time limit of 15 minutes is being specified for the purpose of issuing acknowledgement as well as freezing/blocking of the online access of the trading account. This time limit shall be contracted after a review in next six months after the date of its applicability to enhance protection of investors from suspicious activities.

- b. Post freezing/blocking the client's trading account, send a communication on the registered mobile number and registered e-mail ID of the client, stating that the online access to the trading account has been frozen/blocked and all the pending orders 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 positions (if any) will also be communicated to the client alongwith contract expiry information within one hour from the freezing/blocking of the trading account. This will eliminate the risk of unwanted delivery settlement. This time limit shall be contracted after a review in the next six months after the date of its applicability to enhance protection of investors from suspicious activities.
3. We shall validate that the request for freezing/blocking of the online access of the trading account is received from the respective client only. This will be done by:
 - a. verifying whether request is received from the registered phone number/e-mail Id of the client; or where request is received from other than registered phone number/e-mail Id of the client, we will have a client authentication procedure (2 Factor Authentication) in place or
 - b. Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time.
4. We 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: - We 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 be no restrictions on the Risk Management activities of the Trading Member.
 - b. The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.