

Policy for Voluntary Freezing / Blocking of the Trading Account by the Clients

Entity Name	Manog Securities Private Limited
SEBI Registration No.	INZ000278434
Compliance Officer	Pawan Pratap Singh
Date of Adoption	23-JAN-2026

1. Introduction

This Policy (v 1.0) has been framed in compliance with SEBI Circular No. **SEBI/HO/MIRSD/POD-1/P/CIR/2024/4** dated **January 12, 2024** and NSE Circular No. **NSE/INSP/60277** dated **January 16, 2024**, on the subject "*Ease of Doing Investments by Investors — Facility of Voluntary Freezing / Blocking of Trading Accounts by Clients*", and the NSE Framework Circular No. **NSE/INSP/61529** dated **April 08, 2024** on the subject "*Framework for Trading Members to provide the facility of voluntary freezing / blocking the trading account to their clients*".

This Policy outlines the process and modes through which clients of Manog Securities Pvt. Ltd. ('the Company') can request to freeze / block and unfreeze / unblock their trading account.

2. Purpose

This facility is provided to clients to enable them to take immediate protective action upon noticing any suspicious or unauthorised activity on their trading account. Instances of such activity include:

- Fresh positions being taken without the client's knowledge or action
- Holdings being sold without the client's knowledge or action
- Inability to access the trading account
- Change in linked bank account, email ID, or mobile number without the client's request
- Share transfer via Gift / Easiest initiated without the client's knowledge or action
- Receipt of trade confirmations or OTPs for transactions not executed by the client

3. Scope and Applicability

This Policy applies to all clients of Manog Securities Pvt. Ltd. and all Authorised Persons (APs) registered with the Company. It covers all segments in which the client is registered to trade on the National Stock Exchange of India Ltd.

Distinction: A **Freeze** is a temporary suspension — client may specify a duration; if none is specified, freeze continues until an unfreeze request is received. A **Block** is a long-term suspension — it will remain until the client submits a formal unblock request with identity verification.

4. Procedure to Freeze / Block the Trading Account

4.1 Timelines

Upon receipt of an explicit request from a client to freeze or block their trading account, the Company shall act within the following timelines:

- For requests received **during trading hours**: all efforts shall be taken to freeze / block the account within **15 minutes** of receipt of request
- For requests received **after trading hours** and up to 15 minutes before the next market opening: account shall be frozen / blocked **before the start of the next trading session**

4.2 Request Channels

Clients may request freezing or blocking of their trading account through any of the following channels:

Channel	Contact Details	Availability
Dedicated Email	stoptrade@manogsecurities.com	24 x 7 — requests received after trading hours will be actioned before next session start
Dedicated Helpline	+91-11-42860133	9:00 AM to 5:30 PM on trading days
Online Client Portal	Login → 'Freeze My Account' option	24 x 7

4.3 Identity Verification (Mandatory)

No freeze or block request shall be processed without mandatory identity verification. Stringent verification shall be conducted before acting on any request.

- Requests via Helpline: Client must call from their registered mobile number. Verification shall include: Name, PAN, Date of Birth, Client Code, and one additional KYC detail. Voice recordings of all calls shall be maintained for 5 years.
- Requests via Email: Client must mail from their registered email ID with Client Code, Name, PAN, and description of suspicious activity. The Company shall call back the client on their registered mobile number to confirm the request before processing.
- Both mobile and email compromised: Client must visit the nearest branch in person with original PAN / Aadhaar. Request shall be processed within 15 minutes of in-person verification during trading hours.

5. Procedure to Unfreeze / Unblock the Trading Account

- Clients may unfreeze / unblock their trading account by raising a request through any of the channels listed in Section 4.2 above
- The same identity verification procedure as Section 4.3 shall apply
- Unfreeze requests received **during trading hours**: processed within **15 minutes**
- Unfreeze requests received **after trading hours**: processed before the start of the next trading session
- Unblock (long-term) requests: processed within **24 hours** of receipt of complete request with verified identity

6. Duration and Conditions

- Client may specify a duration for the freeze. If no duration is specified, the freeze shall remain until the client places an explicit unfreeze request

- A freeze shall automatically lapse at the end of the specified duration — no separate unfreeze request is required in such cases
- A block shall not automatically lapse — a formal unblock request with identity verification is required to lift it
- During a freeze or block, the Company's Risk Management System (RMS) shall continue to operate — the Company may square off open positions in case of margin shortfalls as per the Risk Management Policy
- A freeze or block request does not constitute a request to mark the client's UCC as Inactive in the Exchange records — these are separate processes
- Settled trades and obligations that pre-date the freeze are not affected — they shall be settled as per normal Exchange settlement procedures

7. Communication to Client

- Freeze / Block confirmation: **SMS + Email** to the client's registered contacts within 15 minutes of action — confirming action type, date and time, account details, and helpline number for queries
- Unfreeze / Unblock confirmation: **SMS + Email** within 15 minutes of restoration of account to active status
- If the request cannot be processed within the prescribed timeline, the client shall be informed immediately with the reason and an estimated time of action

8. Record Keeping

The Company shall maintain a complete audit trail of all freeze, block, unfreeze, and unblock requests, including: date and time of request, channel, identity verification outcome, action taken, date and time of action, and name of the Company's representative who processed the request. All records shall be retained for a minimum of

The Company shall maintain a complete audit trail of all freeze, block, unfreeze, and unblock requests, including: date and time of request, channel, identity verification outcome, action taken, and the Company representative who processed the request. All records shall be retained for a minimum of **5 years** and shall be made available to SEBI, NSE, or the Internal Auditor on demand.

9. Escalation Mechanism

In the event a client's freeze / block request is not processed within the prescribed timeline, or the client is dissatisfied with the handling of the request, the following escalation path is available:

Level	Contact	Response Time
Level 1	Compliance Officer — Pawan Pratap Singh Email: compliance@manogsecurities.com	Same trading day
Level 2	Director — Mr. Vivek Gupta Email: director@manogsecurities.com	Within 24 hours
Level 3	SEBI SCORES: https://scores.sebi.gov.in NSE Investor Grievance Cell	Within 15 working days

10. Clarifications

- Freezing / blocking applies to the client's **trading account only**. There shall be no restriction on the Risk Management activities of the Company
- A freeze / block request does not constitute a request for marking the client's Unique Client Code (UCC) as Inactive in the Exchange records
- Clients are advised to **separately** contact their Depository Participant (DP) to freeze their demat account — the trading account freeze under this Policy does not automatically protect the demat account from unauthorised securities transfers
- This facility covers only voluntary, client-initiated requests — it does not apply to broker-initiated restrictions arising from regulatory action, court orders, or RMS decisions

11. Request Form — Voluntary Freeze / Block of Trading Account

VOLUNTARY FREEZE / BLOCK REQUEST — TRADING ACCOUNT

To: **Manog Securities Pvt. Ltd.** Date: _____

UCC: _____ PAN: _____

I/We _____ hereby request Freezing Blocking of my/our trading account with effect from _____

Reason for request (brief description of suspicious activity noticed):

Duration of Freeze (if applicable): _____ days / weeks (leave blank for indefinite freeze until unfreeze request)

Update if any detail has changed:

Address	_____
Mobile No.	_____
Email ID	_____
Bank A/c No.	_____

Signature	_____
Date	_____

Note: For address changes, please submit an Account Modification Request with self-attested identity and address proofs. Non-individual clients: affix entity seal near signature.

MANOG SECURITIES PVT. LTD

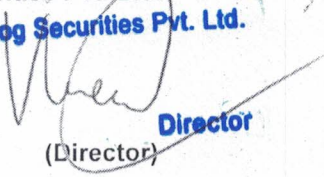
(MEMBER : NATIONAL STOCK EXCHANGE OF INDIA LTD.)

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Policy Review

Last Reviewed	11-FEB-2026
Reviewed By	Pawan Pratap Singh (Compliance Officer)
Approved By	Director

For and on behalf of: Manog Securities Pvt. Ltd.

Authorised Signatory	Mr. Vivek Gupta
Designation	Director
Date	11-FEB-2026
Signature	For Manog Securities Pvt. Ltd.  For Manog Securities Pvt. Ltd. Director (Director)