

POLICY FOR IN ACTIVE CLIENTS
POLICY REGARDING TREATMENT OF INACTIVE/DORMANT CLIENT ACCOUNTS

The objective of the policy is to appropriately deal with the Inactive/dormant clients, where clients have not traded/dealt with us for more than 12 continuous months**. The policy is also applicable for accounts which have been marked inactive on account of Rules, Bye laws, circulars and guidelines issued by SEBI, Exchanges and Internal Risk Management Policies.

Policy**Definition**

If there is no transaction (buy / sell) entered into by the account holder for more than 12 continuous months across all exchange & Segments and Nil Depository Transaction held with us, the account will be marked as "INACTIVE/DORMANT"

Return of Fund & Securities

On a client being declared inactive, the client's funds and Securities shall be settled. Funds & Securities to be settled and ZERO balance to be retained, however fund to the extent of Demat charges to be kept aside. Settlement of client account needs to be done as per the periodicity (monthly/quarterly) opted by the client and funds, securities or any other collateral are required to be returned to the client and statement to be sent to client.

Marking In-Active on Exchange Portal

In-active/Dormant client shall be marked as In-active in UCC records of all exchanges. Further, in case, there is nil fund & securities lying in such account, then the same shall not be required to be reported in day wise client balance submission.

Reactivation

In case such clients want to deal with us within 01 year of marking "inactive/ dormant", such clients shall be reactivated after oral confirmation from such client or written reactivation letter. In case such clients want to deal with us after 01 year of marking "inactive/dormant", such clients shall be reactivated after doing Re-KYC of such client. Basic KYC along with Proof of Identity and address shall be obtained.

In case there is change in details, CKYC and KRA shall be done accordingly. After complying with this requirement, such client shall be activated in UCC records of all the exchanges.

status, then we immediately freeze the client for trade and we unfreeze upon the status is converted to registered with KRA. Further in Case of HOLD Status, we wait for 45 Days from the date of registration for Status up gradation, and after 45th Day, we freeze the client for trades in our system and unfreeze only after the status is upgraded to KYC registered with KRA.

(B) In the Second Type of KRA Status, we follow the given procedure

1. We take KYC Modification form from client in KRA specified format.
2. Enter the details in Modification window using maker checker concept
3. Send the documents along with modification form to KRA within statutory time frame.

(C) In the Third Type of KRA Status, we follow the given procedure

1. We download the KYC with the proofs from KRA and verify the same with the documents available with us.
2. If we found the same are proper, then open the client account and if we found the same is not proper, then follow KYC Modification process as per second type of KRA Status. In the fourth type of KRA status, we wait for the KRA status to be upgraded and follow the process as per A, B or C above on case to case basis.

In case of OLD Clients KRA as per SEBI Circular for Existing clients KRA, we follow above process until the status is arrived at OLD KYC Registered with KRA.