

POLICY FOR INACTIVE CLIENTS

Objective

The objective of the policy is to prevent the inactive client Account being misused by third party and to do proper CDD for reactivation of inactive client.

Policy

Client account will be considered as Inactive, if the client does not trade even a single trade or did not participate in any DP Activity or not made any payment or not made any modification in the KYC during a period of Twelve Months.

All the Inactive clients will be sorted out on monthly basis at the beginning of the month and will be suspended from Trading through CTCL and marked inactive in the Trading Back Office.

In case the client wishes to recommence the trading activity, the client has to make a request for reactivation of the account. Such reactivation will be done after doing proper Due Diligence, which includes Re-KYC.

As a policy, all the client Accounts which were opened prior to 22/08/2011, have been updated with the information of RDDs, Dos and Don'ts and other mandatory documents as specified by SEBI from time to time.

The shares/ledger credit balances if any will be transferred to the client within one week of identifying the client being found Inactive or as required by the statute. The ledger debit balance if any will be recovered after giving due notice. If no response is received for the notice given, we reserve the right to sell the securities for the recovery of such dues if available, or by initiating the legal proceedings or any other action as deem fit and any demission is at the Sole discretion of the Management. All such reactivated accounts will be closely monitored for genuinely of the transactions.

Review Policy

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs.

The policy may be reviewed by the **Director/Compliance Officer** and place the changes in policy before the Board at the meeting.

Approval Authority

This Policy was placed before the board in the Board of Directors meeting held on 26/04/2019 at our registered office and was approved.