

## Policy for treatment of In-active/Dormant Account

### Reference Circulars:-

SEBI circular no.

MIRSD/ SE /Cir-19/2009 dated December 3, 2009.

NSE circular no. NSE/INSP/43488 dated February 10, 2020 and NSE/INSP/46506 dated December 1, 2020 and NSE/INSP/64718 dated October 25, 2024

BSE notice no. 20200210-47 dated February 10, 2020 and 20201201-27 dated December 1, 2020 and 20241025-25 dated October 25, 2025

### For Trading Accounts:

The term In-active/dormant trading account refers to such trading account where no transaction have been carried out in the client's trading account for a period of last 24 months from the date of last transaction across all exchanges or from account opening date. In addition if the client account satisfies any one of the following conditions in previous 24 months, then account will not be marked as inactive/dormant basis clarification provided by Exchanges.

- Funds received from the client's mapped bank account to our client bank account;
- Any transactions in client's mapped demat account (excluding corporate actions);
- Any trade order placed by the client which remained unexecuted;
- Any transactions in Mutual fund including SIP; and
- Applied in IPO irrespective of allotment status

Any other activities in client trading accounts (except for above mentioned activities) such as transfer of funds from our Bank account to client bank account, any update in KYC information of client or any communication / interaction with the client etc. in all such scenarios, as per the aforementioned circulars and clarifications issued by Exchanges, we will mark all such accounts as inactive and necessary due diligence process as mentioned below shall be followed as specified in circulars.

### The following procedure shall be followed for inactive clients:

Sr. No.	Scenarios	Steps to be taken
a	No trades executed by the client in the last 24 (Twenty Four) months across all Exchanges	Mark/Flag the client as 'Inactive'
b	Before completion of one year of the client being marked/flagged as 'Inactive'	We shall ensure that the basic details of such client like Address, Mobile number, Email ID, Bank/DP account are updated in the records as well in the UCC records of the Exchange.  In case there is a change in details, fresh documents to be submitted by the client.  Account will be activated after receiving confirmation from client to activate the account.
c	After completion of a period of 2 year of the client being flagged as 'Inactive'	Fresh documentation, due diligence and IPV to be undertaken. In case of transactions in IPO/MF and DP, fresh documentation, due diligence, and IPV will not be required.

### The requirement for undertaking an IPV shall not be required:

- Where the KYC of the investor is completed using the Aadhaar authentication / verification of UIDAI.
- When the KYC form has been submitted online, documents have been provided through Digi locker or any other source which could be verified online.

### DOCUMENTS REQUIRED FOR ACCOUNT REACTIVATION

- Account Reactivation Letter.
- Copies of PAN, Address Proof and Latest Bank Statement with Cancelled Cheque Leaf.
- Financial Proof (list of valid Income proof)

### PROCEDURE FOR CLIENT REACTIVATION

- (A) The Back office operations team can reactivate a client account which has been made Inactive only when the following documents are obtained from the client:
- a. Communication in writing requesting the account to be reactivated.
  - b. Copies of PAN, Address Proof and Latest Bank Statement with Cancelled Cheque Leaf.
  - c. Updated financial details (Financial Statements in case of corporate clients )

(B) Other Information

The other information as mentioned below shall also be collected/verified from the client on a best effort basis.

- (i) FATCA
- (ii) KRA Documentation (if the client is KRA non-compliant)

(C) Client screening etc.

The client requesting for reactivation of account would be screened for PMLA, Shell companies lists, and other precautionary checks, post which accounts would be activated for trade.