

Policy for treatment of inactive client accounts

Definition of “Inactive” accounts:

The Back office operations team shall carry out a quarterly review of the client accounts. The client who has not done even a single trade in the 24 months pre-ceding the quarter in which the review is carried out will be treated as an “Inactive Client” and such client accounts will be treated as “Inactive Client Accounts”.

The Back office team shall communicate in writing to the Client thirty days prior to Inactivation in the system.

Inactive Client Accounts shall be de-activated by the Back office operations team with the prior approval from the Head-Operations.

The following shall be done immediately at the back office once a Client Account has been identified as Inactive:

1. Communicate in writing to the client at-least a month prior to Inactivation.
2. Obtain approval from Head –Operations to mark as ‘Inactive’.
3. Mark ‘Inactive ’ status in Back Office system
4. Mark ‘Inactive’ status in Front Office system which will not allow trades to be executed on the Inactive client code.
5. Communicate the status to Dealers.
6. Dealers must exercise caution and escalate the case when orders are received for an ‘Inactive’ account.

Return of client money’s, if any in the account:

The balance remaining in the client account as on the date of Inactivation, if any, shall be refunded to the client within one week of Inactivation of the Client Account.

Procedure for reactivation:

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 stating the reasons for being inactive in the past.
- b. Updated financial details (IT returns in case of all clients, Financial Statements in case of corporate clients)

Reactivation of the client account shall be done by the Back office operations team only after obtaining approval from the Head-Operations and Managing Director.