

INACTIVE / DORMANT ACCOUNT POLICY

Objective: The objective of the policy is to appropriately deal with Inactive / Dormant accounts, where clients have not traded for more than 12 months.

Consideration of Dormant Account:

If there is no transaction (buy / sell) entered into by the account holder for more than 12 months, the account will be marked as “**Inactive / Dormant**”.

All the accounts marked as “**INACTIVE / DORMANT**” needs to be monitored carefully in order to avoid unauthorized transactions in the account.

On a client being declared inactive, the client’s funds and Pledge Securities shall be settled. Settlement of client account needs to be done as per the periodicity (monthly / quarterly) opted by the client and his / her assets (funds, securities or any other collateral) be returned to him / her and statement needs to be sent to client.

Dormant Schedule: If the client has not executed any trade for a period of 12 months from the date of activation (this date is recorded as ‘agreement date’ in the system) or last trading date across all exchanges. This is applicable for all clients who are trading in securities and currency derivatives market.

PSPL will inform them when there inactive status updated in Back office. Once we informed the client, then PSPL have no liability to client will face any investment hurdle.

Reason for Account being Inactive / Dormant:

- I. Not traded continuous 12 months.
- II. Where the client is reported or known to have expired.
- III. On written request received from the client.

Penal reason:

- Violation of Company Policy.
- Contravention of agreement.
- Where the client is reported or known to have expired.
- Where Physical statements or contract notes, etc. are received back undelivered and the client is not responding to update the correct details.

- Non Compliance as per Rules, Bye laws, Circulars and Guidelines issued by SEBI, Exchange(s), Depository (s).
- Regulatory, Exchange (s), Depository (s), Order.
- Where client lodges a complaint either directly with PSPL or through the Exchange relating to alleged unauthorized trades being executed in his account.
- Where the account is under investigation by appropriate body.

Deregistering a client:

Notwithstanding anything to the contrary stated in the agreement, PSPL shall be entitled to terminate the agreement with immediate effect in any of the following circumstances:

- If the action of the client is *prima facie* illegal / improper or such to manipulate the price of any securities or disturb the normal / proper functioning of the market, either alone or in conjunction with others.
- On the lunacy or other disability of the Client.
- Misbehaviour occurs by client to any staff member

Process for reactivation:

If the client wants to make the account “ACTIVE”, Client must follow the notes, where explained standard reactivation process.

- Only Resident-Individual Category client can make electronic request. Physical request is required for the restcate
- When client want to re active **CASH segment before 24 Inactive months** client must give consent by Physical or Electronic request. There were no proofs required to re active account.
- When client want to reactive **Derivative and Commodity segment before 24 Inactive months** client must give consent by Physical request or Electronic request. With this request Financial Proof are Mandatory. All the required proof details are described on Re-KYC portal and on physical request form.
- Any reactivation initiated **after 24 Inactive months**, Client must submit KYC form with necessary documents and details.
- In case, any discrepancy is observed, Client /AP /BM must be informed to rectify the same. Until the discrepancy is resolved, re-activation of the dormant account of the client shall be kept in abeyance.

- For those clients who inactive under **penal reason**, they are require to make request with proper evidence. After the scrutinize by compliance officer will take on process. If the compliance officer or In charge Person not satisfied with it request the investor also has to perform In-Person Verification as well.

Note:

- Reactivation process is deeply dependent on Exchange response. If the Exchange is fail to response our request it may be delayed. Client may take a note of the same.
- Reactivation process with modification request is matter to concerning body for approval.
- In modification of details request like Change of Demographic Details, Mobile No., Email ID etc. Client must follow its KYC Validation Process. If the Client fails to do so your application will be rejected, and it will require to resubmit.

Review of the policy:

The policy will be reviewed, in accordance with the circulars that the regulatory authorities may issue from time to time, and changes will be incorporated in consultation with the Board Members / Compliance officer and concerned Head of Department.