



INACTIVE\DORMANT ACCOUNT POLICY OF INVESTSMART STOCK BROKERS PVT.LTD. (ISBPL)

This is an internal policy for INACTIVE\DORMANT ACCOUNT. This policy is applicable to all clients of of Investsmart Stock brokers Pvt.Ltd.

Inactive accounts policy:

ISBPL, shall at regular intervals, fixed by the Board, shall review and analyze the client trading accounts and classify them as “Dormant”, “Inactive” accounts, as part of customer due diligence, Risk Management System & Internal Control.

Classification of Dormant and Inactive Accounts:

“**Dormant “Account”**” is an account where client has not executed any trade in the last 365 days with the company.

“**Inactive Account”** is an account where client has not executed any trade in any segment in the last 730 days with the company & There is no change in KYC details. If any change in KYC details is reported by the client then 730 days period will be calculated from the date of Updation of KYC detail.

Treatment of identified Dormant & Inactive clients:

Dormant Account: At the End of every day Transaction done by Dormant Client has to verify by RMS team by confirming it from client.

Inactive Account: In the first Week of every month RMS team shall identified Inactive Account (for all Exchanges) i.e for company & suspend identified clients from trading on all types of trading platforms (whether online or offline) of all Exchange with or without any notice to clients.

Resumption of Trading:

Inactive Account: Suspended “Inactive” account be reactivated for trading on receipt of application for re-activation from the client along with one of the below-mentioned self – Attested supporting documents

- PAN Card
- Latest Address proof
- Bank Account statement

ISBPL employee **may** carry out “In person” verification of the Inactive client and shall validate the supporting documents submitted by the client with the originals. The trading account **may** get reactivated within 15 working days of submission of the application of re-activation with valid supporting documents.

When Management thinks or whenever changes are mandated by statutory authorities, this policy is to be reviewed.