

POLICY ON INACTIVE TRADING ACCOUNTS

This policy defines the treatment of Dormant/Inactive accounts of the clients registered with Sushil Financial Services Private Limited.

Definition of Inactive Trading Accounts:

In case of trading account, the term inactive account refers to such account wherein no trades have been carried out since last 12 (Twelve) months across all Exchanges/ segments.

Identification of Inactive Accounts

Process of inactive will be run once in a month viz. 1st Saturday of every month.

If a client does not trade in any of the segments/exchanges/products (ETF, Mutual Funds, Bonds, NCD, SLBM etc. through exchange platform) **during a period of last 12 months**, such client codes shall be identified as Dormant Accounts and will be flagged as 'Inactive' in backoffice and UCC database of the exchanges. However, in case a client has undertaken transaction in respect of IPO/Mutual Fund subscription and DP operations during this period, the same may be considered and the requirement for fresh documentation, due diligence, and IPV may not be required.

Once the account is flagged as Inactive, the client will not be able to place any orders/trades in any segments/exchanges. Reactivation / Re-KYC will be applicable from the clients, after 2 years from the date of flagging of client "as Inactive".

Re-activation of Inactive Accounts

Re-activation shall be allowed only after undertaking sufficient due diligence and on fulfilling the following requirements:

1. On receipt of dully filled and updated Re-KYC alongwith with relevant proofs
2. Fresh In-Person Verification (IPV) of the client shall be done before Re-activation of Trading Account.
3. Self-attested copy of Address Proof shall be obtained, in case there is any change in such details.
4. Self-attested copy of Income Proof shall be obtained (for Derivative/Currency Segment), in case of any change in such details.

Upon Re-activation, Trading Account will be made "Active" in the backoffice and UCC database and accordingly trade execution will be allowed for the said client.

If the trading account is made active in UCC database after following the aforementioned due diligence process, the fresh 12 months will be calculated from the date of such reactivation.

Ref: NSE Circular no. NSE/INSP/43488 and BSE Notice No. 20200210-47 dated 10th February 2020

NSE Circular no. NSE/INSP/46506 and BSE Notice no: 20201201-27 dated 01st December 2020

NSE circular no. NSE/INSP/49743 and BSE Notice no: 20210928-53 dated 28th September 2021.

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