

## **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 any of below mentioned activities has not been carried out by client since last 24 (Twenty-Four) months.

- Trading or participation in OFS/buy-back/Open Offer across any of the exchanges/segments\* of the exchanges through the same Member or  
\*Cash/Equity Derivative/ SLBM/Debt/Online Bond Platform/ Any other segment as may be allowed by SEBI/stock exchanges from time to time.
- Transaction in nature of applying/subscribing IPOs (where the IPO bid is successful & not cancelled)/SGBs/Mutual Funds (lumpsum investment or investments through successful SIP instalment payments) on the Mutual Fund platform of the stock exchanges through the same Member or
- Modification/updation in KYC record of client through the same Member and the same has been uploaded to KRA to ensure Validated/Registered status.

### **Identification of Inactive Accounts**

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

The inactive/dormant accounts identified based on the above criteria shall be flagged as 'Inactive' by the Trading Member in backoffice as well as UCC database of all the respective exchanges.

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 including In-Person Verification/Video In-Person Verification (IPV/VIPV) will be applicable for the clients flagged as "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. In-Person Verification/Video In-Person Verification (IPV/VIPV) of the client shall be done at the time of Re-activation of Trading Account.
3. In case of changes in clients' basic details such as Address, Mobile number, Email ID, Bank/DP account, income, etc., we shall seek the updated details along with the necessary documents and update backoffice records, UCC records of the respective Exchanges as well as KRA. If client has confirmed that there is no change in the details, verifiable logs shall be maintained for the same.

Once an inactive trading account is re-activated as per the procedure prescribed above, the computation of next 24 months for the purpose of identifying client as inactive in the subsequent period shall be considered from the date of last reactivation of trading account.

Upon Re-activation, account will be treated as "Active" in the backoffice and UCC database and accordingly trade execution will be allowed for the said client.

Ref: NSE Circular no. NSE/INSP/64718 and BSE Notice No. 20241025-25 dated October 25, 2024

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