

**POLICY REGARDING TREATMENT OF INACTIVE / DORMANT ACCOUNT****Objective:**

The objective of the policy is to appropriately deal with the Inactive / dormant clients, where clients have not traded for more than continuous twelve months.

The policy is also applicable for accounts which have been marked inactive on account of Rules, Bye laws, circulars and guidelines issued by SEBI, Exchanges and Internal Risk Management Policies.

**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 **24 (Twenty-Four)** months across all Exchanges.

**Transaction in Inactive Trading accounts:**

The Inactive accounts identified based on the above criteria shall be marked / flagged as "Inactive" in UCC database of all the respective Exchanges. Further, no trading will be permitted for the Client codes marked as "Inactive" in UCC database of the Exchange and any order placed for such Client will be automatically rejected by the Trading system.

If member wants to allow trade to such inactive client UCC then:

- i. Required to ensure that any further trading by such client should be allowed only after undertaking sufficient due diligence (including IPV) and obtaining the updated information related to ReKYC from the respective client.
- ii. After completing the above process, Member shall mark such client UCC as active and allow the client to trade.

**Procedure to handle Inactive/dormant accounts:****a) Temporarily suspending or Closing a Client's account at the client's request:**

Company may carry out periodic review of the client accounts and may suspend the accounts from trading (i.e. prohibiting any market transactions, only allowing client shares/ledger balance settlement to take place) under any of the following circumstances:

- Where the Client is inactive for the twelve continuous months.
- Where the Client has not cleared his dues after repeated reminders
- Where Physical statements or contract notes, etc. are received back undelivered and the client is not responding to update the correct address.

- Where the client is reported or known to have expired.
- Where client lodges a complaint either directly with HPMG Shares & Securities Pvt. Ltd. or through the Exchange relating to alleged unauthorized trades being executed in his account.
- Where the account is under investigation by any regulatory body.
- As per direction of the Exchanges, SEBI or any other regulatory body.

The Client account can be closed on the written request of the client provided the client account is settled.

**b) Deregistering a client:**

Notwithstanding anything to the contrary stated in the agreement, HPMG Shares & Securities Pvt. Ltd. shall be entitled to terminate the agreement with immediate effect in any of the following circumstances:

- If the action of the client are 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 death/lunacy of the Client.
- If the client being a partnership firm/any other organization, has any steps taken by the Client and/or its partners for dissolution or liquidation.
- If the Client suffers any adverse material change in his/her/its Income Range or defaults in any other agreement with the Stock Broker.
- If the Client has made any material misrepresentation of facts, including (without limitation) in relation to the Security.
- If the Client is in breach of any term, condition or covenant of this Agreement.
- Any suspicious information found by HPMG Shares & Securities Pvt. Ltd in sites like CIBIL, world check, etc. or if there is any commencement of a legal process against the client under any law in force.
- If the client forms a part of the list of debarred entities published by SEBI and/or any action is taken by NSE/BSE/SEBI on the client.

Client account will be considered as inactive if the client does not trade for a period of twelve continuous months.

All the accounts nominated as inactive / dormant needs to be monitored carefully in order to avoid unauthorized transactions in the account. If the client wants to make the account active after 6 continuous months or there after needs to provide the required documents towards supporting the financial status or the client needs to submit a request to reactivate his/her account. In case there is any change in the information such as;

address, mobile number, email id, bank/demat account, financial disclosure provided in KYC at the time of registration as client, the same has to be submitted along with the request. After proper verification of the updated / revised details and approval from the compliance officer / or concerned department in-charge of registration of clients, the account can be made active and transaction can take place.

Process for reactivation of Inactive / dormant account which are inactive for 12 continuous months:

**The Client can follow any of the below process:**

Client can give the duly signed request in writing at main offices of trading member or office of sub-broker or authorized person along with documents such as Address Proof – such as Aadhar Card, Electricity Bill Passport Copy, Email & Mobile number. Identity Proof such as Aadhar Card, Passport Copy, Pan Card and financial Information required for trading in derivative segment. The Client may also courier/ post the same for activation of account

Process for reactivation of Inactive / dormant account which are inactive on account of Risk Management Policies / Non Compliance as per Rules, Bye laws, Circulars and Guidelines issued by SEBI, Exchanges:

Client can give the duly signed request in writing at main offices of trading member or office of sub-broker or authorized person along with the financial Information required for trading. The Client may also courier/ Post the same for activation of account.

On verification of the same the compliance officer / risk department in-charge can authorize the activation of such Inactive accounts subject to Rules, Bye laws, circulars and guidelines issued by SEBI, Exchanges and Internal Risk Management Policies.

**Controls after activation of Inactive Accounts:**

1. Trades in such Inactive accounts be confirmed with respective clients by a person from Head Office who has note punched / received such orders.
2. Alert generation & monitoring at Head Office in case of trade in any Inactive account which is made Active.

**Review Policy:**

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change on account of business needs and Risk Management policy.

**Reference:**

SEBI Circular No. MIRSD/ SE /Cir-19/2009 dated December 3, 2009

SEBI Circular No. SEBI/HO/MIRSD/MIRSD2/CIR/P/2016/92 dated September 23, 2016

BSE Notice No. 20091204-7 dated December 04, 2009, 20100203-30 dated February 03, 2010, 20200210-

47 dated February 10, 2020 and 20201201-27 dated December 01, 2020

NSE Circulars No. NSE/INSP/13606 dated December 03, 2009, NSE/INSP/14048

dated February 03,2010, NSE/INSP/43488 dated February 10, 2020, and

NSE/INSP/46506 dated December 01, 2020

For **HPMG Shares & Securities Pvt. Ltd.**

**DIRECTOR**