

SANJAY AGARWAL BROKING
LIMITED

INACTIVE CLIENTS POLICY

2020

SANJAY AGARWAL BROKING LIMITED

ECSL0710, AMBUJA NEOTIA ECOCENTRE, EM 4, SALT LAKE SECTOR V, KOLKATA - 700091 ● TEL: +91 33 46020776

1. BACKGROUND

The Policy is made in accordance with SEBI vide circular no. dated December 3, 2009 and National Stock Exchange vide circular no. NSE/INSP/13606 dated December 3, 2009 to deal with the inactive/dormant accounts.

2. DEFINITION OF "INACTIVE" ACCOUNTS

The Back office operations team shall carry out a quarterly review of the client accounts. The client who has not done even a single trade in the 36 months pre-ceding the quarter in which the review is carried out will be treated as an "Inactive Client" and such client accounts will be treated as "Inactive Client Accounts".

3. THE FOLLOWING SHALL BE DONE IMMEDIATELY AT THE BACK OFFICE ONCE A CLIENT ACCOUNT HAS BEEN IDENTIFIED AS INACTIVE

- Communicate in writing to the client at-least a month prior to Inactivation.
- Obtain approval from Head –Operations to mark as 'Inactive'.
- Mark 'Inactive' status in Back Office system
- Mark 'Inactive' status in Front Office system which will not allow trades to be executed on the Inactive client code.
- The balance remaining in the client account as on the date of Inactivation, if any, shall be refunded to the client within one week of Inactivation of the Client Account.

4. PROCEDURE FOR REACTIVATION

An inactive account shall be re-activated only after undertaking proper due-diligence process and fulfilling of such conditions as may be deemed fit by the authorized person of the organization.

As a practice, on receipt of an instruction from the client of an inactive account, the authorized person has to appropriately verify the KYC of such clients as well as the authenticity of the instruction. The instruction is to be accepted only on satisfaction of the above.

SANJAY AGARWAL BROKING LTD.

Sanjay Kumar Sonar

Director