VIKASH STOCK BROKING SERVICES PRIVATE LIMITED
Member of National Stock Exchange of India Limited
Member Code : 90105, SEBI Registration No. : INZ000100438, CIN : U67100WB2016PTC21(

POLICY REGARDING TREATMENT OF INACTIVE/DORMANT ACCOUNT

Objective

The objective of the policy is to appropriately deal with the Inactive/dormant clients, where the clients have not traded for more than 12 continuous months.

The policy is also applicable for accounts which have been marked as inactive on account of Rules, Byelaws, Circulars and guidelines issued by SEBI, Stock Exchange and Internal Risk Management Policies.

Background

SEBI vide circular dated Dec 03, 2009 and the NSE vide circular no. NSE/NSP/13606 dated Dec 03, 2009 directed that a policy be framed by the stock brokers to deal with the inactive/dormant accounts.

Policy

It is prudent to keep a track of dormant and inactive accounts, which could be the breeding ground for any unauthorised transactions. Hence, a closer look is warranted for handling dormant accounts and also to lay down a procedure for reactivating them.

Procedure To Handle Inactive/Dormant Accounts:

If there is no transaction (buy/sell) entered into by the account holder for more than 12 continuous months, the account will be marked as 'INACTIVE/DORMANT'.

All Funds & Securities belonging to such Inactive Clients shall be returned to them within a week of marking as Inactive Account.

All the accounts marked as 'INACTIVE/DORMANT' shall be set to a 'zero limit' in the exposures. If the client wants to make the account 'ACTIVE' afterwards, necessary permission will have to be obtained from the operations in-charge/Director.

In case, the client account is made inactive due to submission of documents or any other information, the same will be insisted upon and then only the account shall be reactivated. In case there is any change in the information

Vikash Stock Broking Services Pvt. Ltd.
Vikash Kumar Bothra
Wholetime Director

"Poddar Court" 18 Rabindra Sarani, Gate No. 1, 3rd Floor, Unit No. 304, Kolkata - 700001
Email Id : vsbspvtltd@gmail.com, Tel. : +91 33 2225 0031, +91 33 2225 0032, Fax : 033 2225 0032

such as, address, mobile number, email id, bank/demat account, financial disclosure provided in KYC at the time of registration as client, the same will be collected, verified and incorporated in the client master and then only the activation will be carried out. The client account shall be made active after due verification as per rules and company policy in vogue at those times.

Controls After Activation Of Inactive Accounts

Trades in accounts that have been reactivated after a lapse of 12 months or more shall be confirmed by a person from head office (back office section), who would not have punched the orders.

Approval And Review

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

The Client can follow any of the below processes:

1. Client can give the duly signed request in writing at trading member office or authorized person along with documents such as Identity Proof – such as PAN Card, Aadhar Card, Passport copyetc. and financial Information required for trading in derivative segment. The Client may also courier/ post the same for activation of account or

2. Client can also send an email from registered mail id for reactivation request.

3. Fresh documentation, due diligence and IPV is required when client seeks reactivationafter a period of 1 year

The policy has been decided by the Directors of **Vikash Stock broking Services Pvt. Ltd.** and therefore, further approvals are not necessary. The policy shall 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.

Policy Communication

A copy of this policy shall be made available to all the relevant staff/persons such as: compliance officer / department in-charge of registration of clients and Authorised persons.

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