

POLICY ON DORMANT/INACTIVE ACCOUNTS

OF

GEPL CAPITAL PRIVATE LIMITED

Version 2022

POLICY ON INACTIVE ACCOUNTS/DORMANT ACCOUNTS

The Board of Directors vide Board resolution, discussed and decided the policy on the accounts to be treated as Inactive and/or Dormant as below:

Dormant Accounts

- a. If Clients do not trade for a period of one year at a stretch, he is marked as dormant. Once a Client is marked as dormant in the back office and his code is blocked in CTCL/IML system, no order from such client is executed till either a written request for activating his trading code is received or client personally comes and signs the request letter.
- b. For Reactivation of Account of dormant client, we collect the following documents:
 - i. Reactivation form
 - ii. Running Account Authorization
 - iii. Income details
 - iv. Modification form if any

Inactive Accounts

Inactive client means client who has not traded during last 6 months immediately preceding the end of the previous month.

The concerned department shall mark the client status as “inactive” in various front office software of CTCL and IML and back office accounting and DP software

After inactive marking, if any orders are received, the dealer shall take reasonable steps to identify the client and to ensure that the orders are received from the same client.

In case of inactive client desire to trade, the client needs to provide all relevant documents, if any, for updation of KYC forms, failing which, the account will not be activated and Client shall not be able to trade further

The dealer shall use various techniques viz. call back, asking personal detail questions, last trade date, outstanding positions etc. to confirm the identity of the caller. They may use any other technique which is reasonable. In case of a doubt the case shall be referred to the management or concerned Sub-Broker or Authorized Person.

A list of inactive clients shall be prepared from the back office software on the last day of every month and shall be submitted to the concerned department after confirmation with the management. The management will approve a final list of inactive clients.

A copy of the list is also forwarded to dealers who operate our Dealing Terminals.

For **GEPL CAPITAL PVT. LTD.**

Sd/-



Mr. Vivek I. Gupta
Director