

INCRD CAPITAL WEALTH PORTFOLIO MANAGERS PRIVATE LIMITED**POLICY ON INACTIVE(DORMANT) ACCOUNTS****1. OBJECTIVE:**

Intermediaries need to comply with the SEBI guidelines issued vide circular No. MIRSD/SE/Cir-19/2009 dated December 3, 2009 and NSE/INSP/43488 dated February 10, 2010, directed that “The stock broker shall frame the policy regarding treatment of inactive accounts which should, inter-alia, cover aspects of time period, return of client assets and procedure for reactivation of the same. It shall display the same on its web site, if any”, in terms of which we have been directed to frame the policy regarding treatment of inactive accounts. On December 1, 2020, NSE issued a circular with reference NSE/INSP/46506 regarding the treatment of inactive trading accounts. This was in continuation to an earlier NSE circular with reference NSE/INSP/43488 dated February 10, 2020.

2. DEFINITION OF DORMANT / INACTIVE ACCOUNTS:

In case of trading account, the term dormant / inactive account refers to such account wherein no transactions & trades have been carried out since last 1 year (12 Months) across stock exchange segments.

3. TRANSACTIONS IN DORMANT/INACTIVE TRADING ACCOUNTS:

The dormant accounts identified based on the above criteria shall be flagged as ‘Inactive’ by Incred Capital in the UCC database of all exchange segments. Incred Capital reserves the right to freeze/deactivate such accounts and shall not permit to carry out any fresh transaction in such account. The clients’ accounts would be reactivated only after undertaking proper and sufficient due diligence (Including IPV) and obtaining the updated information related to KYC from the concerned client.

4. PROCESS FOR RE-ACTIVATION OF DORMANT ACCOUNT FOR NON-INSTITUTIONAL CLIENTS:

Client can get his account reactivated by following any of the below mentioned process after due authentication:

- a. The Client’s request through letter/ registered email id/recorded telephone line can be considered to reactivate the account to carry out any fresh transaction in a dormant account.
- b. Call the dealer from his/her registered telephone number identifying himself / herself through internal validation questions (as may be as asked by Dealer) and request for activation of account for placing orders/transacting in the account.
- c. Fresh KYC to be obtained from the client.
- d. IPV has to be done for the client by RM/Dealer of Salesperson, if client is not physically present then IPV has to be done through video calling which has to be stored for audit purposes.
- e. Also, in the following circumstances, the requirement for undertaking an IPV will not be required.

- If the KYC of the investor is completed using the Aadhaar authentication/verification of UIDAI
- If the KYC form has been submitted online and the documents have been provided through Digi locker or any other source which could be verified online

5. PROCESS FOR RE-ACTIVATION OF DORMANT ACCOUNT FOR INSTITUTIONAL CLIENTS:

- a. Dormant accounts/Inactive accounts may be reactivated based on the request received from Business Manager with evidence of the client request like an email or call recording or Bloomberg chat or any other mode.
- b. An email from registered email id for reactivation of the client if request mode is calls or Bloomberg then after activation of the account confirmation email has to be sent to client along with the client code by Business Manager or the person who has received the request.
- c. Operations should check the KYC records available with the KRA and ensure that KYC documents in the record are updated post activation of the client.

6. SETTLEMENT PROCESS WHEN THE ACCOUNT IS IN DORMANT/INACTIVE FORM:

During the period when client account is suspended, market transactions in account shall be prohibited. However, in case if there are shares/ledger balances in client account, settlement can take place as per the running account option (monthly/quarterly) opted by client and would be in accordance with the settlement policy followed by us

7. INTERNAL AUDIT:

The process to be verified by an internal auditor during internal audits as prescribed by the exchange, so to ensure that guidelines set under this policy have been adhered to.

8. REVIEW OF PROCESS:

This process may be reviewed as and when there are any functional changes amongst the team members and or as part of process development and or when it is found necessary to change the policy due to regulatory directives, business needs, the same would be placed before the Board/Executive committee for their review and approval. In any case the policy will be reviewed once a year and put up to the Board for approval.

9. ACTIONS FOR NON-COMPLIANCE:

To adhere to these guidelines would be the responsibility primarily of Operations-KYC team and further for blocking of codes would be that of RMS, and any deviation to the above process and /or non-compliance would not be acceptable under any circumstances and would be viewed seriously.

10. POLICY COMMUNICATION:

A copy of this document shall be made available to all the relevant staff and updated in records of HR as process and policy document. This document would be available on our website and clients can refer same.

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