

Policy on Inactive Account/Dormant Account

FOUR DIMENSIONS SECURITIES (INDIA) LIMITED

Periodicity of Review: As and when changes occurs / Yearly	Last reviewed on: 12.02.2025
Office responsible for implementation: Compliance Officer	

Policy on Inactive Account/Dormant Account

01. Objective:

This Policy defines the treatment of Dormant/Inactive accounts of the clients maintained with the Company. The objective of the policy is to appropriately deal with the Inactive/dormant clients, where clients have not traded for more than 24 (Twenty Four) 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.

02. Definitions:

In case of trading account the term dormant/Inactive account refers to such account wherein any of below mentioned activities has not been carried out by client since last 24 (Twenty-Four) months:-

1. Trading or participation in OFS/buy-back/Open Offer across any of the exchanges/segments* of the exchanges through the same Member or
2. Cash/Equity Derivative/ Currency Derivative/ Commodities Derivative/EGR /Debt/Online Bond Platform/ Execution Only Platform /Any other segment as may be allowed by SEBI/stock exchanges from time to time.
3. Transaction in nature of applying/subscribing IPOs (where the IPO bid is successful & not cancelled)/SGBs/Mutual Funds (lumpsum investment or investments through successful SIP instalment payments) on the Mutual Fund platform of the stock exchanges through the same Member or
4. Modification/updation of e-mail Id/Mobile Number/Address in KYC record of client through the same Member and the same has been uploaded to KRA to ensure Validated/Registered status.

03. Transaction in Inactive / Dormant Trading Accounts:

The inactive accounts identified based on the above criteria shall be flagged as 'Inactive' by the Trading Member in UCC database of all the respective Exchanges.

04. Mandatory requirement for re-activation of the trading account:

case the client who is flagged as inactive seeks re-activation of the trading account, the Trading Member, while reactivating the said client, shall

- a. Mandatorily comply with In-Person Verification/Video In-Person Verification (IPV/VIPV) requirement specified in the SEBI Master Circular on KYC dated October 12, 2023.
- b. Seek confirmation from the client if there is any change in clients' basic details such as Address, Mobile number, Email ID, Bank/DP account, income, etc. as registered with the Member. In case of changes in any of the said details, the Member shall seek the updated details along with the necessary documents and update in its records as well in the UCC records of the respective Exchanges. In case of KRA Validated status or Registered status through same intermediary cases, the Trading Member may fetch the details along with the necessary documents from the KRA record and display the said details for confirmation of the

client and updation in its record. If there is change, then member shall update the UCC records of Exchanges as well as KRA. If client has confirmed that there is no change, the Member shall maintain the verifiable logs of the same.

- c. Notwithstanding anything contained above, in case a client seeks re-activation then member shall verify client status as per KRA and if the client status as per KRA is not validated (i.e. "On hold"/"Rejected"/"Registered" through other intermediary, etc.) then the member shall seek basic details like Address, Mobile number, Email ID, Bank/DP account, income, etc. along with the necessary documents as required by KRA and upload the same to KRA to ensure validated/registered status as per KRA before permitting client to trade on the Exchanges.

The clients account would be reactivated only after undertaking proper due diligence process and fulfillment of above mentioned conditions

The client's request through letter (draft given in ANNEXURE I) / registered email ID / recorded telephone lines may be impressed upon to reactivate the account or carry out any fresh transactions in an Inactive / Dormant account.

Once an inactive trading account is re-activated as per the procedure prescribed above, the computation of next 24 months for the purpose of identifying client as inactive in the subsequent period shall be considered from the date of last reactivation of trading account.

The communication/notification may be sent to the clients prior to flagging their trading account as inactive however such communication/notification will not ask the clients to trade in order to prevent their accounts from being flagged as inactive.

05. Closing of Accounts:

The company on its own does not have a policy regarding closure of any trading account and thus any trading account once opened in the company records shall be closed if the account has been inactive for more than five years and client does not have any asset with the company.

06. Approval Authority:

This policy shall be approved by the Board of Directors

07. 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 the policy due to business needs.

Notwithstanding anything contained in this policy, the Member shall also ensure adequate due diligence of the client on an ongoing basis (including, but not limited to, doing Re-KYC) in compliance with the provisions of the PMLA guidelines issued from time to time and in accordance with their respective KYC policies.

Annexure I

Inactive / Dormant Trading Account Activation - Request

Date: _____

To, The Compliance Officer
Four Dimensions Securities (India) Ltd.
209-210, Arcadia Building, 2nd Floor,
195, Nariman Point,
Mumbai 400 021.

Dear Sir,

Re: Request for Activation of Dormant Trading Account No. _____

I/We, Mr. /Ms. / Mrs. _____ maintain the above Trading Account with you. The said Trading Account has not been operated by me / us for a long time. I / We understand that due to security reasons, the company has classified the said account as "Inactive / Dormant". I/We request you to re-classify the account as "active". I/We agree to fulfill your all compliances related to reactivation of Trading Account.

Yours truly,

Signature of Client :

Client Code :

FOR OFFICE USE ONLY

Signatures Verified by :

Account Activated by :

_____ Signature of senior official