



DB (International) Stock Brokers Ltd.

- NSE & BSE : CAPITAL MARKET, F&O & CURRENCY SEGMENTS
- MCX ICEX: COMMODITIES
- DEPOSITORY PARTICIPANT: CDSL IPO, MUTUAL FUND & BONDS

SEBI REGISTRATION NO. : INZ000179035 (BROKING), IN-DP-CDSL-266-2004 (DEPOSITORY)

Office: 114, New Delhi House, 27 Barakhamba Road, New Delhi-110001

Tel.:011-43606162 Website: www.dbonline.in E-Mail: compliance@dbonline.in

CIN: L67120GJ1992PLC121278

POLICY REGARDING TREATMENT OF INACTIVE/DORMANT ACCOUNT

PURPOSE:

As per guidelines prescribed by SEBI vide circular no. dated December 3, 2009, and stock exchanges vide circular no. NSE/INSP/43488 dated February 10, 2020, NSE/INSP/ 64718 dated October 25, 2024, and other circulars in this regard, this policy is being framed to deal with the inactive/dormant accounts.

OBJECTIVE:

The objective of the policy is to appropriately deal with the Inactive/dormant clients.

DEFINITION OF INACTIVE TRADING ACCOUNT:

In case of trading account, the term 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:

- Trading or participation in OFS/ Buy-back/ Open Offer across any of the exchanges/ segments* of the exchanges through DB or

*Cash/ Equity Derivative/ Currency Derivative/ Commodities Derivative/ EGR/ Debt/ Online Bond Platform/ Executive Only Platform/ Any other segment as may be allowed by SEBI/ stock exchanges from time to time.

- Transaction in nature of applying/ subscribing IPOs (where the IPO bid is successful & not cancelled)/ SGB/ Mutual Funds (lump sum investment or investments through successful SIP installment payments) on the Mutual Fund platform of the Stock Exchanges through the DB or
- Modification/update 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.

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POLICY:

1. Procedure to handle inactive/dormant accounts:

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

2. Reactivation of Inactive client In case the client who is flagged as inactive seeks re-activation of the trading account, while reactivating the said client, shall:

- Mandatorily In-Person Verification/Video In-Person Verification (IPV/VIPV) requirement specified in the SEBI Master Circular on KYC dated October 12, 2023.
- 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, Client has to provide 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 we 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 we shall update the UCC records of Exchanges as well as KRA. If client has confirmed that there is no change, the we shall maintain the verifiable logs of the same.
- 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.

Once an inactive trading account is re-activated as per the above procedure, 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.

Notwithstanding anything contained above, DB 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.

3. Return of Clients Assets

We are required to ensure that all client accounts are settled on monthly or quarterly basis (*as per the client preferences*) in the manner prescribed from time to time. In case a we are unable to

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settle the client accounts due to non-availability of client's account details and non-traceability of client, Members are advised to make all efforts to trace the clients to settle client account and maintain an audit trail for such efforts made for tracing such clients and settling their account. In case of receipt of any claims from such clients, members are advised to settle the accounts immediately and ensure that the payment/delivery is made to the respective clients only.

**For and on behalf of
DB (International) Stock Brokers Limited
Sd/-
Shiv Narayan Daga
Managing Director**