

## POLICY ON INACTIVE ACCOUNTS/DORMANT ACCOUNTS

As per GEPL Board resolution, the accounts will be treated as inactive as below:

Some of the Points to be consider as below:

- Inactive client means client who is inactive during last 12 months immediately preceding the end of the previous month.
- 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.
- The concerned department shall mark the client status as "inactive" or "dormant" 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 identity of the client and to ensure that the orders are received from the same client.
- In case of inactive client desire to trade, the client need to provide all relevant documents, if any, for up-dation of KYC forms, failing which, the account will not be activated.
- The dealer shall use various techniques like 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.