FE SECURITIES PRIVATE LIMITED

Policy on Inactive / Dormant Accounts

This policy defines the treatment of Dormant / Inactive accounts of the clients maintained with the Company.

Definition of Dormant / Inactive Accounts

In case of trading account the term Dormant/Inactive account refers to such account wherein no transactions have been carried out since last 12 (twelve) calendar months.

In case of Demat account the term Dormant/Inactive accounts refers to such accounts where no debit transaction had taken place for a continuous period of 6 (six months) months. However to meet CDSL norms, the DP Back office software will show caution for dormant, if no debit has taken place for 3 months. Such caution alert should be counter checked with Client/ BO and initialled. The CDSL Alert arises in case of no debit for 6 months.

Transaction in Dormant/Inactive Trading Accounts

The Dormant accounts identified based on the above criteria shall be flagged as such in company's record. Company reserves the right to freeze/deactivate such account and refuse to carry out any fresh transactions in such account, and may carry out further due diligence for such a client.

As additional precautions need to be exercised prior to trade, the following procedure should be adopted where client has not transacted for 6 months, or any considerable period.

The following procedure should be followed:

- 1. Normal market information should be provided as per usual. However any order should be held back and client informed about recheck.
- 2. Refer to back office for recheck on UCI, and documentation, especially in view of SEBI/ Exchange circulars from time to time.
- 3. The back office will revert to the trader after checking:
 - (a) Incase of any pending matters call the client and advise him accordingly.
 - (b) Incase all documents are in order, inform the senior who will give approval to the trader after review.

To ensure and check the client identity, our office will in return the call to the client. This will prevent any identity misuse. While there will be a small delay in the verification process at the back office, the need for compliance should be explained to the client politely to ensure best service to the client.

The clients account would be reactivated only after undertaking proper due diligence process and fulfillment of such conditions as may be deemed fit, in the specific case.

The client's request with fresh self attested ID through letter /registered email ID may be acted upon to reactivate the account or carry out any fresh transactions in a Dormant/inactive account.

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Debit Transaction in Dormant Demat Accounts

The Demat accounts wherein no debit transaction had taken place for a continuous period of 6 (Six) months shall be flagged as Dormant/Inactive accounts. Additional due diligence would be observed over and above the normal verification procedure while processing any debit transactions in such accounts. The transaction shall also be verified with the BO, and the details of the process, data, time, etc., of the verification on the instruction slip shall be recorded under the signature of a senior official.

The above stated policy may vary depending on various rules, regulations and bye laws as may be prescribed by SEBI, exchanges or any other authority or as per Internal policy of FE Securities Private Limited from time to time. This Policy for dormant accounts is over and above the transaction monitoring in Dormant account as per Anti-Money Laundering Policy of the Company.

For FE Securities Pvt. Ltd.

Divij Kaul

Designated Director

Cc: Compliance Officer

Review:22.06.2021

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