

ABans Group of Companies

Policy for Dormant and Inactive Accounts

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[Board Resolutions Dated: ASPL - 2nd Nov'20 / ABSPL - 15th Oct'20 / ACIPL - 2nd Nov'20]

**ABans Securities Private Limited (ASPL)
ABans Commodities (I) Private Limited (ACIPL)
ABans Broking Services Private Limited (ABSPL)**

This policy lays down the basis for classification of clients' accounts maintained with ABans Group of Companies (ABans) as Dormant/Inactive.

Definition of Dormant/Inactive Accounts

In case of trading accounts all accounts will be termed as Dormant/Inactive if no transactions have been carried out since last 6 (six) calendar months.

In case of Demat accounts all accounts will be termed as Dormant/Inactive if no debit transaction has taken place for a continuous period of 6 (six) calendar months.

Transaction in Dormant/Inactive Trading Accounts

All accounts identified as Dormant based on the above criteria will be highlighted in ABans' records. ABans reserves the right to freeze/deactivate such accounts and no fresh transactions will be allowed to be carried out in the account. The Dormant/Inactive account will be reactivated only after undertaking proper due diligence process and other requirements as may be deemed fit in case where the account has been frozen/deactivated.

The request for reactivation has to be either through letter/registered e-mail id/recorded telephone lines subsequent to which the account will be reactivated and fresh transaction will be allowed to be carried out.

Transaction in Dormant Demat Accounts

All accounts identified as Dormant based on the above criteria will be highlighted in ABans' records. In this regard additional due diligence would be observed over and the normal verification procedure for fresh processing of debits transaction in such accounts. Such transactions shall also be verified with the BO in case of high value debits and the details of the process, date, time etc of the verification on the instruction slip shall be recorded under the signature of a senior official.

Procedure for implementation of the policy

Clients to be segregated in two categories:

- **Client registered before implementation of SEBI circular dated August 22, 2011.**

Required Process:

- Execute full KYC in the latest format, with IPV
- Risk disclosure documents and other contents forming part of Supplement to KYC be sent to the given email id of the client.

- **Client registered after implementation of SEBI circular August 22, 2011.**

Sub Category 1: Client details need to be modified.

Required Process:

- Execute CKYC.
- In case of change in details not captured in CKYC, such as Bank details, nomination, mandate etc. then accordingly required form to be undertaken.
- Requisite supporting documents to be collected and verified.
- If there is substantial change in details then full KYC can be undertaken, along with IPV done.

Sub Category 2: Client details remain constant.

Required Process:

- Client to undertake the prescribed form confirming the status quo.
- Self-certified identification proof such as Pan Card or Aadhar Card or both to be collected.

Common Points for all categories:

- Collect updated financial details such as Bank Statement, ITR for Individual and Annual report, net worth certificates for Non-individual.
- Calling the client over a recorded line confirming the undertaking. (Preferred)
- Collect Ledger Balance Confirmation. (Optional)

All documents for reactivation shall be kept in record so as to enable the Company to demonstrate that appropriate Customer Due Diligence procedures have been followed.

The above policy may vary from time to time depending on the various rules and regulations of the regulators (SEBI / Exchanges & Depository) or any other authority or as per internal policy of ABans Group of Companies from time to time.

***SEBI circular SEBI/HO/MIRSD/DOP/CIR/P/2020/73 dated Apr 24, 2020, exempts the requirement of IPV in the following cases:-

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