

# Asit C. Mehta

INVESTMENT INTERMEDIATES LTD.

## Dormant Client Policy

Clients entrust us with their money as well as shares to us. Funds from client are given to us as advance margin for future purchases in the market and shares are kept in our depository account as beneficial owners. Sometimes shares are also left in the company's pool / beneficiary account since a particular script is not available with the depository for demat purpose.

There is a possibility of teeming and lading of clients' asset in event of inactivity / lack of attention by the client. The company does take precaution of informing the client on a periodic basis by issuing holding statement / account confirmations. Yet there is a possibility that the client is ignorant about his assets. In such circumstances in order to prevent misuse, it is necessary that the system should generate alerts when such assets are put to use i.e. there is a transition in the account which results in use of funds / share balances.

### Definition

#### *1. Dormant Client for trading purpose*

Dormant client is one who has no transactions in the preceding six consecutive months. Transaction includes a trade in secondary market.

#### *2. Dormant client for DP Services*

Dormant client is recognized as per CDSL Bye laws.

#### *3. Appropriate authority*

Appropriate Authority shall be the person designated for this purpose. In absence of such designation, the compliance officer of the company will be the appropriate authority.

#### *4. Dormant Status*

The dormant status shall be marked so on the first day of each month.

### *5. Active Status*

Active status shall be confirmed through a computer interface on the appropriate authority being satisfied about the genuineness of the identity of the dormant client who has placed order after six month.

#### **Procedure for identification of dormant client.**

The Authorised person of the company on a regular basis identifies the dormant client (as defined above) who has placed the trade in secondary market after six month from MIS report generated through system. Authorized authority verifies and confirms the trade done by the client on the contact number registered with database.

#### **Suspension of services**

Client will be suspended for trading in case Authorized person gets the unsatisfactory answer from the client who has placed the trade.

#### **Reactivation of the client**

Client will not be able to activate for trading till he gives request / explanation in writing for removal of suspension of trading code.