

Policy Regarding Treatment of Inactive / Dormant Client Account

1.0 Objective:

The objective of this policy is to lay down procedures to deal with Inactive / Dormant clients, where clients have not traded for more than 6 continuous months.

This policy is also applicable for clients who have been marked inactive on account of Rules, Bye laws, circulars and guidelines issued by SEBI and Exchanges.

2.0 Definition of Inactive accounts:

If there is no transaction (buy / sell) entered into by the account holder for more than 6 continuous months, the account will be marked as "INACTIVE".

3.0 Procedure to handle Inactive accounts:

Clients becoming INACTIVE are marked "INACTIVE" in the back office and front office Risk Management System software.

All the clients marked as "INACTIVE" are monitored carefully in order to avoid unauthorised transactions in the account.

If the client wants to make the account "ACTIVE" after 6 continuous months, then the client is required to submit entire KYC details which includes, Copy of PAN Card, Aadhar Card, Address and ID Proof, and Bank Statements for last six months.

In case there is any change in the information such as: address, mobile number, email id, bank / demat account details, financial disclosure provided in KYC at the time of registration as client, then the client has to submit the same along with the request.

After proper verification of the revised details and approval from the concerned department in-charge of registration of clients, the account will be made "ACTIVE" by Updation to the Exchanges and transaction can take place thereupon.

3.1 Process for reactivation of Inactive client which are inactive for 6 continuous months:

For activation, Inactive client will have to give duly signed request in writing at any of the offices / branches, or office of Authorised Person of Libord Brokerage Private Limited along with documents such as Address Proof - such as Copy of valid Passport, Aadhar Card, Voter ID card, Electricity Bill. Identity Proof - such as Copy of valid Passport, Aadhar Card, Voter ID card, Pan Card and copy of Statement of Bank Account for last six months or copy of last ITR, to fulfil the requirement of financial Information required for trading in derivative segment.

On verification of the same, the Department in – charge can authorise the activation of such inactive client, and the account will be made “ACTIVE” by Updation in Back office and Front office Risk Management System software and Updation to the Exchanges.

3.2 Process for reactivation of Inactive clients which are inactive on account of Non-Compliance as per Rules, Bye laws, Circulars and Guidelines issued by SEBI, / Exchanges:

3.3 Client can give the duly signed request in writing at any of the offices / branches, or at the office of Authorised Person of Libord Brokerage Private Limited along with the financial Information and other required details as may be necessary for Compliance as per Rules, Bye laws, Circulars and Guidelines issued by SEBI, / Exchanges.

On verification of the same, the department in - charge can authorise the activation of such inactive client subject to Rules, Bye laws, circulars and guidelines issued by SEBI / Exchanges.

The client account will be made “ACTIVE” by Updation to the Exchanges and Updation in Back office and Front office Risk Management System software.

4.0 Controls after activation of Inactive clients:

Transactions in such inactive accounts will be started after due authorization by the Compliance officer of the Company.

5.0 Review Policy:

This policy will be reviewed as and when there are changes introduced by Board of Directors.

6.0 Policy communication:

A copy of this policy shall be made available to all the relevant Persons such as Compliance officer, Department in - charge of registration of clients, Branch Managers and Authorised Persons.

Further, a copy of this policy will be displayed on website.

7.0 Approval Authority:

This policy has been approved by Board of Directors in their meeting held on 22.11.2018.