

MAXGROWTH CAPITAL PRIVATE LIMITED
(“MGCPL”) Policy regarding treatment of INACTIVE
ACCOUNTS

INACTIVE ACCOUNT: Where no transaction has taken place in client’s account (Trading/Demat) during the last 6 months from the date of last transaction, then it will be considered as inactive / dormant account.

CONSEQUENCES OF INACTIVE ACCOUNT: On a client being declared inactive,

- (1) The client’s funds and security account shall be settled.
- (2) In case the demat account/bank account details are not available and the client is not contactable, the securities/funds are transferred into a separate account of MaxGrowth Capital Private Limited and held till such time
- (3) The account of the client shall be locked and the client shall not be permitted to execute a fresh transaction in the account.

CLIENT DECLARED INACTIVE VOLUNTARILY:

A client may write to MGCPL stating that he wishes to transfer his account into an “inactive” status, based on which the account will be marked as such.

CLIENT DECLARED INACTIVE BY PASSAGE OF TIME:

Any client who has not traded continually for a period of 5 years and has also not renewed his running account authorization for 5 continuous years will automatically be moved to the “inactive” category.

CLIENT DECLARED INACTIVE BY LAW:

Any client will be moved to the “inactive” category if required by law.

PROCEDURE TO ACTIVATE THE LOCKED CLIENT ACCOUNT:

An e-mail request to reactive the account and process the transaction. Such e-mail request shall be sent only from the e-mail id of the Client registered with MGCPL; or

A written request to reactive the account and process the transaction duly signed by Client and submitted to MGCPL;

or

A telephonic request to reactive the account and process the transaction. Such telephonic request shall be at the specified number of MGCPL for which voice recording is active. Further the request shall be processed only after the client provides additional identification as required.

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 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.

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 MGCPL 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.