



ELIXIR EQUITIES PRIVATE LIMITED

Inactive Client policy

A. Definition of Inactive Trading Account

In case of trading account, the term inactive account refers to such account wherein any of below mentioned activities has not been carried out by client since last 24 (Twenty Four) months:

1. Trading or participation in OFS/buy-back/Open Offer across any of the exchanges / segments of the exchanges through EEPL or
2. Modification/ updation of e-mail Id/ Mobile Number/ Address in KYC record of client through EEPL and the same has been uploaded to KRA to ensure Validated/ Registered status.

B. Flagging

The inactive accounts identified based on the above criteria shall be flagged as 'Inactive' by EEPL in UCC database of all the respective Exchanges.

C. Reactivation

In case the client who is flagged as inactive seeks re-activation of the trading account, EEPL, while reactivating the said client, shall:

1. Mandatorily comply with In-Person Verification (IPV) requirement specified in relevant SEBI Circular(s)
2. Seek confirmation from the client if there is any change in clients' basic details such as Address, Mobile number, Email ID, Bank/DP account, income, etc. as registered with EEPL (In case of changes in any of the said details, the Member shall seek the updated details along with the necessary documents and update in its records as well in the UCC records of the respective Exchanges.)
3. In case of KRA Validated status or Registered status through same intermediary cases, EEPL may fetch the details along with the necessary documents from the KRA record and display the said details for confirmation of the client and updation in its record. If there is change, then member shall update the UCC records of Exchanges as well as KRA. If client has confirmed that there is no change, EEPL shall maintain the verifiable logs of the same.
4. Notwithstanding anything contained above, in case a client seeks re-activation then EEPL shall verify client status as per KRA and if the client status as per KRA is not validated (i.e. "On hold"/"Rejected"/"Registered" through other intermediary, etc.) then the member shall seek basic details like Address, Mobile number, Email ID, Bank/DP account, income, etc. along with the necessary documents as required by KRA and upload the same to KRA to ensure validated/registered status as per KRA before permitting client to trade on the Exchanges.



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5. Once an inactive trading account is re-activated as per the procedure prescribed in point no. 3 mentioned above, the computation of next 24 months for the purpose of identifying client as inactive in the subsequent period shall be considered from the date of last reactivation of trading account.

D. Communication

EEPL may send the communication/notification to the clients prior to flagging their trading account as inactive however such communication/notification should not ask the clients to trade in order to prevent their accounts from being flagged as inactive.