

INACTIVE / DORMANT ACCOUNT**POLICY & PROCEDURE**

GAINN FINTECH PRIVATE LIMITED has formulated policies and procedure to be followed for inactive /dormant client. The policy broadly covers the aspects of time period and procedure for reactivation of account of the clients as stated here under

This is in reference to the Exchange circulars NSE/INSP/64718 and 20241025-25 dated October 25, 2024 with respect to guidelines on Treatment of Inactive Trading Account. account wherein any of below mentioned activities has not been carried out by client since last 24 (Twenty-Four) months:

- Trading or participation in OFS/buy-back/Open Offer across any of the exchanges/segments* of the exchanges through the same Member or*Cash/Equity Derivative/ Currency Derivative/ Commodities Derivative/EGR /Debt/Online Bond Platform/ Execution Only Platform /Any other segment as may be allowed by SEBI/stock exchanges from time to time.
- Transaction in nature of applying/subscribing IPOs (where the IPO bid is successful & not cancelled)/SGBs/Mutual Funds (lumpsum investment or investments through successful SIP instalment payments) on the Mutual Fund platform of the stock exchanges through the same Member or
- Modification/updation of e-mail Id/Mobile Number/Address in KYC record of client through the same Member and the same has been uploaded to KRA to ensure Validated/Registered status.

For re-activation of the same post inactivation kindly follow the below steps:

The dormant account will be activated only after receiving request from the client to re-activate his accounts along with all the required formalities of KYC COMPLIANCE. The re-activating of trading account will require the following details/documents:

1. Proof of identity.

2. Latest Proof of Residential Address.
3. Latest Proof of Bank account.
4. Latest Proof of Demat statement.
5. Financial Details (Applicable for Derivatives Segment).

Once an inactive trading account is re-activated as per the procedure 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.

GAINN FINTECH PRIVATE LIMITED 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.

Return of Clients assets **GAINN FINTECH PRIVATE LIMITED** are required to ensure that all client accounts are settled on monthly or quarterly basis (as per the client preferences) in the manner prescribed from time to time. In case a **GAINN FINTECH PRIVATE LIMITED** is unable to settle the client accounts due to non-availability of client's account details and non-traceability of client, **GAINN FINTECH PRIVATE LIMITED** are advised to make all efforts to trace the clients to settle client account and maintain an audit trail for such efforts made for tracing such clients and settling their account. In case of receipt of any claims from such clients, **GAINN FINTECH PRIVATE LIMITED** are advised to settle the accounts immediately and ensure that the payment/delivery is made to the respective clients only. **GAINN FINTECH PRIVATE LIMITED** shall ensure to keep such unsettled funds up streamed to Clearing Corporations

Notwithstanding anything contained above, the **GAINN FINTECH PRIVATE LIMITED** shall also ensure adequate due diligence of the client on an ongoing basis (including, but not limited to, doing Re-KYC) in compliance with the provisions of the PMLA guidelines issued from time to time and in accordance with their respective KYC policies.

In case of existing clients who are inactive as per earlier guidelines, but are active as per revised guidelines, they may be considered as active client for trading. However, while reactivating such clients' accounts, the **GAINN FINTECH PRIVATE LIMITED** shall also ensure to update the status of such clients as active in UCC database of Exchange.