

TREATMENT OF INACTIVE CLIENTS POLICY

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Treatment of Inactive Clients Policy

What is an Inactive Client?

Any client who has not carried out any of the below mentioned activities since last 24 (Twenty-Four) months shall be treated as an Inactive client and will be moved to inactive category:

• 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.

Once the client is moved to Inactive category, Unifi will update UCC database of all the respective Exchanges.

Unifi shall send the communication/notification to the clients prior to flagging their trading account as inactive however we shall ensure such communication/notification requires the clients to trade in order to prevent their accounts from being flagged as inactive.

How does Unifi deal with inactive client?

On being categorized as an inactive client, the following action is taken the trading account is immediately suspended / frozen thereby disabling further trading in Account.

Funds if any, held in the credit of the client account is returned to the client. Stocks, if any, held in the 'Client unpaid Securities Account' is returned to the client.

Details of the clients having funds or securities balances shall be reported even if their UCC has been flagged as 'Inactive'

Reactivation Procedure

In case the client who is flagged as inactive seeks re-activation of the trading account, then the following procedure is to be followed:

(i) The client has to give a request for reactivation is writing.
(ii) Mandatorily comply with In-Person Verification/Video In-Person Verification (IPV/VIPV) requirement specified in the SEBI Master Circular on KYC dated October 12, 2023
(iii) 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

Unifi. In case of changes in any of the said details, Unifi 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.

In case of KRA Validated status or Registered status through same intermediary cases, Unifi 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 Unifi shall update the UCC records of Exchanges as well as KRA. If the client has confirmed that there is no change, Unifi shall maintain the verifiable logs of the same.

Notwithstanding anything contained above, in case a client seeks re-activation then Unifi 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 Unifi 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.

(iv) Re-activation will be done only after completion of the necessary due diligence process and only with the approval of the Compliance officer or Managing director.