

SADRAVYA MONEY MANAGEMENT PRIVATE LIMITED

Inactive Account Policy

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:

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

The inactive accounts identified based on the above criteria shall be flagged as 'Inactive' in UCC database of all the respective Exchanges, as well as in the Back Office.

Re-activation of the trading account

While reactivating the client –

- Client shall be subject to In-Person Verification/Video In-Person Verification (IPV/VIPV)
- In case of changes in Address, Mobile number, Email ID, Bank/DP account, income, etc., the client shall provide the updated details along with the necessary documents and same shall be updated in the records as well in the UCC records of the respective Exchanges. In case of KRA Validated status or Registered status through same intermediary cases, the SADRAVYA MONEY MANAGEMENT PRIVATE LIMITED 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 SADRAVYA MONEY MANAGEMENT PRIVATE LIMITED shall update the UCC records of Exchanges as well as KRA. If client has confirmed that there is no change, then verifiable records shall be maintained.
- In case a client seeks re-activation then SADRAVYA MONEY MANAGEMENT PRIVATE LIMITED 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 SADRAVYA MONEY MANAGEMENT PRIVATE LIMITED 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.

- SADRAVYA MONEY MANAGEMENT PRIVATE LIMITED may send the communication/notification to the clients prior to flagging their trading account as inactive
- Notwithstanding anything contained above, the SADRAVYA MONEY MANAGEMENT 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.