

## **SWASTIKA INVESTMART LIMITED (SIL)**

### **Dormant Account Policy:**

The policy for a dormant account has been defines the treatment of Dormant/Inactive accounts of the clients maintained with the Company framed out under the specific guidelines of Prevention of Money Laundering Act (PMLA) for the safety and security of the investors as well as the financial market.

### **Definition:**

An account shall be termed to be dormant if it is inactive or remains non-operational by its holder at a stretch for a specified period of time. This specific period of time has been defined under the PMLA. Presently, this period is twelve calendar months i.e. if a trading account wherein no transactions have been carried out since last 12(twelve) calendar months and in case of Demat account the term Dormant/Inactive accounts refers to such accounts where no debit transaction had taken place for last 12(twelve) Months.

### **Transaction in Dormant/Inactive Trading Account:**

The dormant accounts identified based on the above criteria shall be flagged as such in the record of SIL. SIL reserves the right to freeze/deactivate such permit to carry out any fresh transactions in such account. reactivated only after undertaking proper due diligence process and fulfillment of such conditions as may be deemed fit, in the cases where the freezed /deactivated.

The Company can take the request of client to reactivate the account or carry out any fresh transactions in dormant/inactive accounts through a letter in writing /registered email ID / telephone lines may be impressed upon to reactivate the account or carry out any fresh transactions in a dormant/inactive account.

### **Debit Transaction in Dormant Demat Account:**

The Demat accounts wherein no debit transaction had taken place for a continuous period of 12(Twelve) months shall be flagged as Dormant/Inactive accounts. Additional due diligence would be observed over and above the normal verification in debit transactions in such accounts. The transaction shall also be verified with the BO 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 the company 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.