

G.N.G. INVESTMENT LIMITED

POLICY FOR INACTIVE CLIENTS

The said Policy has been framed to describe the procedure for identification and treatment of Inactive client accounts and is based on Exchange Circular Ref No. NSE/INSP/64718 dated 25th October 2024.

The client accounts wherein no trades have been carried out since last 24 months are termed as Inactive accounts and the same shall be flagged as "Inactive" in the UCC database of the Exchange and our back office system and trading terminals.

We may send the communication / notification to the client, other than Institutional Client, prior to flagging their trading account as inactive.

In case the client, other than Institutional Client, seeks reactivation, the client account shall be reactivated only after ;

- Complying with In-Person Verification/Video In-Person Verification (IPV/VIPV) requirement specified in the SEBI Master Circular on KYC dated October 12, 2023.
- Obtaining the 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 us. In case of changes in any of the said details, we 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, we 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 our record. If there is change, then we shall update the UCC records of Exchanges as well as KRA. If client has confirmed that there is no change, we shall maintain the verifiable logs of the same.

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

We shall have right to de-register inactive clients who have not traded in preceding three financial years by giving a notice of 30 days to the client. However, if the client desires to reactivate the account then he shall have to comply with prevalent KYC guidelines before recommencement of trading activity.

Return of Clients assets: We shall 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 we are unable to settle the client accounts due to non-availability of client's account details and non traceability of client, we shall 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, we shall settle the accounts immediately and ensure that the payment/delivery is made to the respective clients only. We shall ensure to keep such unsettled funds upstreamed to Clearing Corporations.

