

SWASTIKA INVESTMART LIMITED (SIL)

Dormant Account Policy:

The policy for dormant or inactive accounts has been established to outline the treatment of such client accounts maintained with the Company. This policy is framed in accordance with the guidelines of the Prevention of Money Laundering Act (PMLA) to ensure the safety and security of investors and the financial market.

Definition:

In case of trading account, 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 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 (lump sum 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.

Transaction in Dormant/Inactive Trading Account:

Accounts identified as inactive based on the above criteria will be marked as 'Inactive' by SIL in the UCC database of all the respective Exchanges. SIL reserves the right to freeze or deactivate such accounts and will allow new transactions only after completing a proper due diligence process and meeting the conditions prescribed by the exchanges from time to time.

Re-activation of Dormant/Inactive Trading Account:

The Company may process a client's request to reactivate their account or conduct new transactions in dormant/inactive accounts. Such requests can be made through a written letter, registered email ID, or online. Reactivation will only proceed upon submission of all required documents and compliance with the conditions specified by

the exchanges from time to time. 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 and after submission of all the documents & fulfillment of all the conditions as defined by the exchanges from time to time.

Debit Transaction in Dormant Demat Account:

The Demat accounts wherein no 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 in 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.