

Dormant / Non-Trading Client Monitoring Policy**1. Objective**

The objective of this policy is to establish a framework for identification, monitoring, and reactivation of dormant or non-trading client accounts. This ensures prevention of unauthorized transactions, compliance with SEBI/Exchange requirements, and mitigation of Anti-Money Laundering (AML) risks.

2. Scope

This policy applies to all clients of the firm across all segments (Equity, F&O, Currency, Commodity, and Depository). It covers:

- Dormant clients (inactive for a specified period).
- Non-trading clients (accounts opened but never used).
- Reactivation procedures for such clients.

3. Definition of Dormant / Non-Trading Client

- A client account is considered **dormant/inactive** if there are **no trades for 12 months** or more.
- A client account is considered **non-trading** if it is opened but no trades have ever been executed.
- The firm may also apply a **stricter definition** (e.g., 6 months inactivity) as part of internal risk policy.

4. Identification and Monitoring

- The back-office system shall automatically generate a list of dormant/non-trading clients on a **monthly basis**.
- Such accounts will be marked as **inactive** in the trading system.
- No further trades shall be permitted until the account is reactivated following due process.

5. Reactivation of Dormant Clients

A dormant/non-trading account can be reactivated only after:

1. **Client Confirmation** – Written/email confirmation from the registered email ID/phone.
2. **KYC Verification** – Verification of updated KYC details, including address, contact number, and financial details (if required).
3. **Due Diligence** – Risk/AML checks to ensure no suspicious activity is involved.
4. **Approval** – Final reactivation shall be authorized by the **Compliance Officer/Operations Head**.

6. Risk Management Measures

- Dormant accounts shall be monitored for any **suspicious trades** (unusually high volume, unrelated to profile, etc.).

Corporate Member : N S E / B S E / M S E I / MCX
(Capital Market / F&O / Currency and Commodity Segment / Commodity Exchange)

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- Alerts generated by the surveillance system for dormant/non-trading accounts shall be investigated immediately.
- Any suspicious transaction shall be reported to the **Principal Officer under PMLA**.

7. Client Communication

- Clients shall be informed at the time of account opening about the **dormant account policy**.
- Periodic reminders shall be sent to clients regarding inactivity and the procedure for reactivation.

8. Roles and Responsibilities

- **Operations Team:** Identify and tag dormant/non-trading accounts, process reactivation requests.
- **Risk/Surveillance Team:** Monitor alerts and report unusual activities.
- **Compliance Officer:** Ensure regulatory compliance, oversee reactivation approvals, and maintain records.

9. Record Keeping

- Records of dormant accounts, reactivation requests, and approvals shall be maintained for a minimum of **5 years**.
- Audit trails shall be preserved for all reactivation activities.

10. Review of Policy

- This policy shall be reviewed annually or earlier in case of changes in SEBI/Exchange guidelines.
- Any modifications shall be approved by the Board/Designated Director.

Place: Ahmedabad

Updated Date: 01-08-2025

FOR AMRAPALI CAPITAL AND FINANCE SERVICES LIMITED



Designation of the Issuing Authority:

(Compliance Officer / ~~Director~~ / ~~Proprietor~~ / ~~Partner~~ / ~~HR Manager~~)

Name: Nilesh Kapuriya

Corporate Member : N S E / B S E / M S E I / MCX
(Capital Market / F&O / Currency and Commodity Segment / Commodity Exchange)

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