



## KLAY SECURITIES PRIVATE LIMITED

### DORMANCY POLICY

CONTROLLED COPY



SUMMARY OF POLICY

Policy Name	Dormancy Policy
Policy Type	B - Board B - Board                      M - Management
Related policies and regulations	SEBI                      Master                      Circular (SEBI/HO/MIRSD/DOP1/CIR/P/2018/87) dated June 01, 2018
Effective Date	October 22, 2018
Owner / Contact	Klay Securities Private Limited
Approver	Board of Directors



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## 1. Introduction

Klay Securities Private Limited (KSPL) is a SEBI Registered Market Intermediary engaged in stock broking business as envisaged under SEBI (Stock-Brokers and Sub-Brokers) Regulations, 1992. In terms of SEBI Master Circular (SEBI/HO/MIRSD/DOP1/CIR/P/2018/87) dated June 01, 2018, this Policy has been adopted by KSPL.

## 2. Scope of the Policy

The scope of this policy is to formulate clear guidelines for identification, suspension and reactivation of Client codes which has been categorized as dormant / inactive as per the KSPL Dormancy policy.

## 3. Definitions & Abbreviations

<b>Client</b>	A person (including a corporate body) who has been enrolled as a Client of KSPL.
<b>Dormant Accounts</b>	An account where there have been no transactions for defined period shall be defined as dormant accounts.
<b>KSPL / Company</b>	Klay Securities Private Limited, a Company incorporated under the Companies Act 2013, and a SEBI Registered Stock Broker.
<b>SEBI</b>	The Securities Exchange Board of India

## 4. Dormancy

The stock broking Client of KSPL will be marked as dormant, when the following conditions below are fulfilled:

NO transactions for the last 12 months shall be identified as a dormant account. Transactions here mean the following:

- No purchase or sale transaction through the Client account in the Cash Segment
- No purchase or sale transaction through the Client account in the Derivative segment
- No purchase or sale transaction through the Client account in the currency derivative segment
- No Bank Receipts or Payments (Client Funds Pay-in or Pay-out)
- No Mutual Fund or IPO transactions through the Client account.
- Any other Financial or Security transaction affecting the common ledger of the Client maintained in the back office for KSPL.



## 5. Identification and flagging

The process of identifying the dormant accounts based on the above-mentioned criteria shall be run on a monthly (on the last working day of the month) basis post the EOD activities for the day. Accounts identified as dormant shall be flagged as dormant in the trading system, back office system. Intimation to the Client in the form of an email / SMS shall be sent to the Client informing that the Client account has been made inactive due to the dormancy. No trades shall be allowed in such accounts.

## 6. Reactivation

For re-activation of such accounts, Clients shall be required to submit a written request (either a physical letter or an email from the registered email ID) to the Compliance Office along with the copy of PAN. The application for re-activation shall be considered by the Chief Risk Officer of KSPL, and if found appropriate, such dormant account shall be re-activated. The Client shall be intimated in writing (physical letter or an email to the registered email ID of the Client) of the outcome of the application for re-activation.

## 7. Redressal of Grievances

In case of grievances, if any, the Client shall approach KSPL through the grievance redressal mechanism.