
INACTIVE CLIENT POLICY

CAPITAL FOCUS

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Document Information

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1 INTRODUCTION

Inactive client means client who is inactive during last 6 months.

2 PROCESS FLOW

2.1 Identification of Inactive Clients

A list of inactive clients shall be prepared from the back office software on the last day of every month and shall be submitted to the concerned department after confirmation with the management. The management will approve a final list of inactive clients.

2.2 Procedure

- A copy of the list is also forwarded to dealers who operate our ODIN or NEST terminals.
- After inactive marking, if any orders are received, the dealer shall take reasonable steps to identify the identity of the client and to ensure that the orders are received from the same client. The dealer shall use various techniques like call back, asking personal detail questions, last trade date, outstanding positions etc to confirm the identity of the caller. They may use any other technique which is reasonable. In case of a doubt the case shall be referred to the management.
- Dormant client has to update their KYC details at the time of fresh order, if required.
- All Credit Balances Lying in Inactive accounts will be paid back to the respective clients once in a quarter after clearing the dues if any.

3 REVIEW POLICY

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs and would be placed before the Directors committee for their review and approval.

4 POLICY COMMUNICATION

A copy of this policy shall be made available to all the relevant staffs.