
ACL POLICY ON INACTIVE CLIENT ACCOUNTS

1. For the purpose of this policy, any existing, non-institutional client account in which there is a single transaction in the previous financial year shall be deemed to be an “active” account. In the case of any existing, institutional client account in which there is a single transaction in any of its sub-account(s) or scheme(s) in the previous three financial years shall be deemed to be an “active” account.
2. An “inactive” account is deemed to be one which is not “active” as mentioned above or which may be setup but never traded. Such non-institutional client accounts and institutional client accounts at the parent level may be marked as “inactive” in the systems upon periodic review. The same shall be communicated by the back-office to the concerned sales traders at the trading desk.
3. We first check the last trade date for all clients at the beginning of the financial year. After that we mark clients into inactive as per policy - any existing, non-institutional client account in which there is a single transaction in the previous financial year shall be deemed to be an “active” account. In the case of any existing, institutional client account in which there is a single transaction in any of its sub-account(s) or scheme(s) in the previous three financial years shall be deemed to be an “active” account.
4. The exercise to designate accounts as “inactive” will be done once every year after the close of the previous financial year or at such other time interval as may be required.
5. In the interest of the firm’s and the client’s safety and in order to comply with the SEBI and / or exchange regulations, no order shall be executed in an “inactive” account without first re-activating it.
6. An “inactive” account may be re-activated for normal trading activity upon receiving a request for the same, from the client and upon receipt of current KYC supporting documents and / or updating of any changes, as may be required.
7. All requests for re-activation of “inactive” accounts shall be duly checked by the client on-boarding team for completeness of the KYC itself or the supporting documentation and duly authorized by Compliance.
8. Once an “inactive” account is “re-activated” after following the above procedure, it may be enabled for regular trading activity, as usual. The same shall be communicated by the back-office to the concerned sales trader at the trading desk.

9. As even an “inactive” account is that of an existing client whose KYC formalities were previously completed and such client is known to ACL, in case of any genuine reason, e.g. urgency to report a trade, etc., a temporary exception to the above may be permitted in rare cases on a case-to-case basis on the authorization of Business Head.

Date of Review: April 5, 2018

Reviewers Comments:

The Policy was reviewed and minor changes as deemed appropriate were made.

Reviewed By:

Kayomarz Patel
Compliance Officer