

SUNFLOWER BROKING PRIVATE LIMITED

INACTIVE (DORMANT) ACCOUNT POLICY

SEBI vide circular no. dated December 3, 2009 and National Stock Exchange vide circular no. NSE/INSP/13606 dated December 3, 2009 directed that a policy be framed by individual brokers to deal with the inactive/dormant accounts.

As per Guidelines issued by exchanges and circular the policy on inactive accounts are framed by Sunflower Broking and implemented the same.

The policy is also applicable for accounts which have been marked inactive on account of Rules, Bye laws, circulars and guidelines issued by Sebi, Exchanges and Internal Risk Management Policies.

Definition of Inactive Trading accounts: In case of trading account, the term inactive account refers to such account wherein no trades have been carried out since last 12 (Twelve) months across all Exchanges.

A Client who has not traded for consecutive period of 12 months in any Segment of any Exchange will be considered as Dormant Client and his trading account will be marked as Dormant. Client trading facility will be disabled in the terminal.

A list of inactive clients is extracted from the Back-Office software where no transactions have been carried out for a period of more than one year by the client. The concerned department shall mark the client status as "inactive" or "dormant" in various front office software of CTCL and IML and back office accounting and DP software.

Transaction in Inactive Trading accounts: The inactive accounts identified based on the above criteria shall be flagged as 'Inactive' by the Trading Member in UCC database of all the respective Exchanges.

Sunflower broking ensure that any further trading by such client should be allowed only after undertaking sufficient due diligence (including IPV) and obtaining the updated information related to KYC from the concerned Client. Appropriate disciplinary actions may be initiated in case of any trades are executed in any account flagged as 'Inactive'.

When Client account is marked as Dormant, his assets (funds and/or securities) lying as margin will be refunded to the Client.

Process for reactivation of Inactive / dormant account which are inactive for 12 continuous months:

Registered Office

"Sunflower House", 5th Floor, Nr. Bhaktinagar Circle,
Rajkot-360002. Ph: 0281-236-1935

Corporate Office

A-501, Privilon Building, Near Iscon Temple, SG Highway,
Bodakdev, Ahmedabad-380054. Ph: 079-4039-6993

As and when Client wishes to resume trading, he/she has to provide request in writing along with self-attested copies of latest income proof and other KYC documents such as PAN Card, Aadhar Card, Passport copy, and financial Information required for trading in derivative segment.

Client can submit physical letter of request for reactivation or mail to concern department through registered email id of client given to Sunflower Broking.

Appropriate client due diligence and IPV is carried out by Sunflower Broking during process of reactivation request of client.

After completion of documentary and KYC requirements as prescribed by SEBI, Exchanges and other regulatory bodies from time to time, On verification of the documents the Client trading facility shall resume by Sunflower Broking.

Process for reactivation of Inactive / dormant account which are inactive on account of Risk Management Policies / Non-Compliance as per Rules, Bye laws, Circulars and Guidelines issued by SEBI, Exchanges:

Clients shall give duly signed request in writing to any of the Branch/Main Offices of Sunflower Broking along with identity proof and financial information to reactivate trading account.

Upon receiving all Required documents and verification of the same by concern department person-in charge can authorize the activation of such accounts subject to approval of SEBI, Exchanges and Rules, Bye laws, circulars and guidelines issued in this regard.

The above stated policy may undergo change/ 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 Sunflower Broking from time to time.