

# NEEL B. DALAL

Member of the  
Bombay Stock Exchange

## NEEL B DALAL

### Policy for treatment of Inactive/DormantAccounts:

#### Objective:

The objective of the policy is to appropriately deal with Inactive/Dormant accounts, where clients have not traded for more than 12 months. 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, any statutory/regulatory authority and Internal Risk Management Policies.

#### Background:

SEBI vide circular MIRSD/SE/Cir-19/2009 dated December 3, 2009 and BSE notice no.20091204-7 dated December 4, 2009 directed that a policy be framed by stock brokers to deal with the inactive/dormant accounts.

#### Procedure to handle Inactive/dormant accounts:

If there is no transaction (buy / sell) entered into by the account holder for more than 12 months, the account will be marked as "INACTIVE/DORMANT". All accounts marked as "INACTIVE/DORMANT" shall be monitored closely in order to avoid unauthorized transactions in such accounts. If the client wants to make the account "ACTIVE" after 12 months, the client needs to submit a request to reactivate the account. In case there is any change in the information such as; address, mobile number, email id, bank/demataccount, financial disclosure provided in KYC at the time of registration as client, the same has to be submitted along with the request. After proper verification of the updated /revised details and approval from the compliance officer, the account can be made "ACTIVE" and transaction can take place.

The Firm very few clients and all are very well known to the designated partners of the Firm. Moreover, most of the clients are long term investors and hold shares for long period of time after purchasing them. Hence, it may happen that the trades are few and after long periods of time. However, the Compliance Officer shall activate a dormant account only after proper interaction with the client and after full satisfaction. Moreover, more than 99% of clients trade on a delivery basis and hence there is virtually no scope of misuse of dormant account.

The Firm will review the policy from time to time as per SEBI/BSE guidelines.

**NEEL B. DALAL**  
**SHARE & STOCK BROKER-CL-No.518,**  
**39, ALLI CHAMBERS, TAMRIND LANE,**  
**MUMBAI - 400 001.**  
**SEBI REGN. NO. INB010017716**

head office : 39 a/b, alli chamber, tamarind lane, fort, mumbai - 400 001.

telephone: back office: 22656678/79

trading room: 22656680 / 81 mobile: 8879996670, direct : 91-22-22657687

email: neelbkdalal@rediffmail.com