AAA INSTITUTIONAL SECURITIES PVT LTD

Space On B-16-A, Plot No-5, Community Centre, New Friends Colony, New Delhi - 110065 | Tel. No.: 011 - 49948719 | Mob. No. +91-96677 38861

Email: info@aaa-securities.com | Website: www.aaa-securities.com

CIN: U66120DL2026PTC464792

AAA INSTITUTIONAL SECURITIES PRIVATE LIMITED

Inactive Account Policy

1. INTRODUCTION

For the purpose of this Policy, an **Inactive Account** refers to a client account wherein none of the activities specified below has been carried out by the client for a continuous period of **24 (Twenty-Four) months**:

- Trading or participation in **Offer for Sale (OFS), Buy-back or Open Offer** across any of the Exchanges/segments of the Exchanges;
- Transactions relating to **application/subscription to IPOs**, where the IPO bid is successful and has not been cancelled;
- Investment in **Sovereign Gold Bonds (SGBs)**;
- Investment in **Mutual Funds**, whether through lump-sum investment or successful SIP instalment payments, through the Mutual Fund platform of the Stock Exchange(s); or
- Modification/updation of the client's **email ID, mobile number or address** in the KYC records, where the updated details have been uploaded to the KRA to ensure **Validated/Registered status**.

The accounts identified as inactive based on the above criteria shall be appropriately flagged as **"Inactive"** in the **UCC database of the respective Exchanges**, as well as in the Company's Back Office system.

2. RE-ACTIVATION OF TRADING ACCOUNT

Before reactivating an inactive trading account, **AAA Institutional Securities Private Limited** shall undertake the necessary verification and due diligence as prescribed under applicable regulatory requirements.

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The following shall apply:

- The client shall be subject to **In-Person Verification (IPV)/Video In-Person Verification (VIPV)**, wherever applicable.

- In case of any change in the client's **address, mobile number, email ID, bank account, demat account, income details or other KYC particulars**, the client shall provide the updated details along with the necessary supporting documents. The updated information shall be incorporated in the Company's records as well as the UCC records of the respective Exchanges, wherever applicable.

- Where the client's KRA status is **"Validated"** or **"Registered" through the same intermediary**, the Company may fetch the relevant details and supporting documents from the KRA records and display such details to the client for confirmation and updation in the Company's records.

- Where any change is identified or confirmed by the client, **AAA Institutional Securities Private Limited** shall update the relevant UCC records of the Exchanges and KRA records, wherever applicable.

- Where the client confirms that there is **no change** in the KYC particulars, the Company shall maintain appropriate **verifiable records/evidence of such confirmation**.

- Where a client seeks reactivation of the account, the Company shall verify the client's status as available with the **KRA**. If the client's KRA status is not **"Validated"**, including where the status is **"On Hold", "Rejected" or "Registered" through another intermediary**, the Company shall obtain the basic details such as **address, mobile number, email ID, bank account, demat account, income details**, etc., along with such supporting documents as may be required by the KRA.

- The Company shall upload/update the requisite information with the KRA to ensure the client's **Validated/Registered status**, as applicable, before permitting the client to trade on the Exchanges.

3. COMMUNICATION TO CLIENT

AAA Institutional Securities Private Limited may send an appropriate communication/notification to the client before flagging the client's trading account as **"Inactive"**, wherever considered appropriate or required under applicable regulatory requirements.

4. ONGOING DUE DILIGENCE AND RE-KYC

Notwithstanding anything contained in this Policy, **AAA Institutional Securities Private Limited** shall ensure adequate and appropriate due diligence of clients on an ongoing basis.

Such due diligence shall include, but not be limited to, undertaking **Re-KYC**, wherever applicable, and shall be carried out in accordance with:

- applicable provisions of the **Prevention of Money Laundering Act (PMLA)**;
- applicable KYC requirements;
- SEBI regulations, circulars and guidelines; and
- other applicable regulatory requirements, as amended from time to time.

5. POLICY REVIEW

This Policy shall be reviewed periodically and whenever there is any change in the applicable regulatory requirements governing inactive accounts, KYC, KRA validation or client due diligence.

The Compliance Officer shall be responsible for monitoring the implementation of this Policy and recommending amendments, wherever necessary.

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6. POLICY APPROVAL / REVIEW

Particulars	Details
Company	AAA Institutional Securities Private Limited
Policy Name	Inactive Account Policy
Policy Owner	Compliance Officer
Last Reviewed	26th October 2026
Review Frequency	Periodically / As and when required
Applicable From	26th October 2026

The **Inactive Account Policy** was approved by the **Board of Directors of AAA Institutional Securities Private Limited** at its meeting held on **26th October 2026** and shall come into effect from the date of approval.