



Wealthstreet
The Financial Engineers

Policy on Dealing with Inactive/Dormant Clients

I. Introduction

At WealthStreet, we prioritize compliance with regulatory standards and strive to deliver the best possible services to our clients. To ensure the continued security of client accounts and transactions, we have developed this policy to manage dormant accounts. This policy complies with the guidelines issued by SEBI and relevant Exchange Circulars, regulating accounts that show no trading activity over extended periods.

II. Background

This policy is formulated in accordance with Exchange Circular No. MCX/COMP/513/2009 dated December 15, 2009, MCX/COMP/298/2010 dated August 21, 2010, and any other applicable SEBI regulations. The policy addresses the classification, reactivation, monitoring, and proper handling of dormant or inactive client accounts to ensure compliance with industry standards.

III. Classification of Inactive/Dormant Accounts

An account will be classified as **Inactive/Dormant** if:

- No transaction has occurred in the account for a period exceeding 365 days (12 consecutive calendar months).
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IV. Treatment of Inactive/Dormant Accounts

1. Reactivation of Dormant Accounts

If a client's account has been inactive for over 365 days, it will be classified as dormant.

Reactivation of dormant accounts is contingent upon the following:

- **Written Request:** The client must submit a formal written request, along with a completed and signed Dormant Account Reactivation Form. This form must be submitted via email to WealthStreet, along with the client's latest 6-month bank statement for financial updates. The request must also be sent from the **registered email ID** (compulsory).
- **KYC Revalidation:** The client must confirm that their Know Your Customer (KYC) details are up to date. If there have been any changes to their personal or financial information, the client will need to provide updated KYC documentation before placing any further transactions.
- **Dealer Verification:** The assigned dealer must verify the identity of the client before accepting any new orders or transactions.

Wealthstreet Financial Services Private Limited

Formerly Known as Wealthstreet Advisors Private Limited

CIN: U74999GJ2016PTC094432

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- **Compliance Check:** The Compliance Department will verify that all regulatory obligations are met before reactivating the account.
2. **Execution of Orders**
Once the dormant account is reactivated:
 - The client must confirm that their account is in good standing and comply with the latest regulatory requirements.
 - The account will be cleared for transactions after the reactivation process is completed.
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V. Monitoring of Dormant Account Transactions

1. **Evaluation and Review**
 - Dormant accounts will be reviewed daily to ensure that they are not being used for any unusual activity.
 - A detailed monitoring system will track any transactions made in dormant accounts.
 2. **Suspicious Activity Detection**
 - Sudden or large-volume transactions in dormant accounts will be flagged as suspicious.
 - These transactions will be analyzed in detail by the Risk Management and Compliance Departments.
 - If deemed suspicious, a Suspicious Transaction Report (STR) will be submitted to the appropriate regulatory authorities.
 3. **Reporting and Actions**
 - Risk Management will take immediate action to assess and resolve any potential risks associated with dormant account transactions.
 - Compliance will ensure all reports are filed with SEBI and the respective exchanges, as per regulatory requirements.
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VI. Return of Assets from Dormant Accounts

1. **Quarterly/Monthly Settlement**
 - Dormant accounts will undergo settlement at the end of each quarter or month, and any remaining balances will be returned to the client.
2. **Early Asset Return Request**
 - Clients wishing to access their assets from a dormant account before the scheduled settlement may submit a written request for early return of funds or securities.

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- **Processing Timeline:** Upon receiving such a request, the Company will process the withdrawal and return the funds or securities within 7 business days.
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VII. Record Maintenance

- All documents related to dormant accounts, including reactivation forms, KYC updates, and client communications, will be securely stored and maintained as per the rules and regulations set by SEBI, the Exchanges, and internal Company policies.
 - Records will be available for inspection by relevant authorities or internal audits, as required.
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VIII. Review of Policy

This policy will be periodically reviewed and updated based on:

- **Regulatory Changes:** Any updates or amendments to SEBI guidelines, Exchange circulars, or relevant statutory requirements.
- **Operational Needs:** Business adjustments to better align with market conditions or customer needs.
- **Risk Management:** To ensure the continued protection of clients' funds and to enhance monitoring mechanisms in response to emerging risks.

Revisions to the policy will be promptly communicated to clients and stakeholders as necessary.

IX. Conclusion

The Policy on Dealing with Inactive/Dormant Clients ensures that WealthStreet maintains a high level of regulatory compliance while safeguarding client interests. By monitoring dormant accounts, reacting promptly to suspicious activities, and ensuring the secure return of client assets, the Company aims to maintain the integrity of the market and enhance customer trust.

This policy reflects our commitment to transparency, compliance, and customer security, fostering a sustainable and responsible business environment.

X. Contact Information

For further queries regarding dormant accounts, clients can reach out to our Compliance Department or Customer Support.

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