

DORMANCY/INACTIVE POLICY

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1. Introduction

MBL & Company Limited (MBL) is a SEBI Registered Market Intermediary engaged in retail broking business in equities and currency market. The SEBI Circular which has a mention about the framing of dormancy policy by Intermediaries issued on December 03, 2009 forms the basis of formulating and implementing this Policy.

2. Scope of the Policy

The scope of this policy is to formulate clear guidelines for identification, suspension and reactivation of client codes which has been categorized as dormant / inactive as per the VFSPL Dormancy policy

3. Definitions & Abbreviations

Client	A person (including a corporate body) who has been enrolled as a client of MBL as per the provisions of SEBI/Exchange(s).
Dormant/ Inactive accounts	An account where there have been no transactions for defined period shall be defined as dormant accounts
Suspended Accounts	An account which has been disabled so that no transaction is allowed is termed as suspended accounts
Management	Management of MBL
Risk Management Committee	A Committee appointed by the Board of Directors to mitigate risk factors
AGSSL	MBL & Company Limited, a Company incorporated under the Companies Act 1956, and authorized by SEBI to act as Stock Broker under SEBI (Stock-Brokers and Sub-Brokers) Regulations, 1992 as a Stock Broker of BSE Limited (BSE), National Stock Exchange of India Limited (NSE) {herein after referred to as Stock Exchange(s)}
SEBI (Regulator)	The Securities Exchange Board of India

4. Dormancy

Client will be marked as dormant, when all 3 conditions below are be fulfilled

1. No transactions for the last 12 months shall be identified as a dormant account. Transactions here mean the following:
 - No purchase or sale transaction in the Cash Segment of NSE & BSE

- No purchase or sale transaction in the Derivative segment of NSE & BSE
 - No purchase or sale transaction in the currency derivative segment of NSE
 - No Bank Receipts or Payments (Client Funds Pay-in or Pay-out)
 - No Mutual Fund or IPO transactions through online portal provided by Bhajjee.
 - Any other Financial or Security transaction as provided on the website or through the offline mode affecting the common ledger of the customer maintained in the back office for Bhajjee.
2. No login history in past for last one year
 3. Client is having credit balance in his account greater than Rs 1000 OR client is having demat holding in his account OR both

5. Identification & Suspension:

The process of identifying the dormant accounts based on the above mentioned criteria shall be run either daily / weekly / monthly basis post the EOD activities for the day. Accounts identified as dormant shall be flagged as dormant in the trading system, back office system. Intimation to the client in the form of an email / SMS shall be sent to the client informing that the client account has been made inactivate due to the dormancy.

- 6. Reactivation Offline Process:** For activation of such accounts, clients shall be required to submit a written request to the customer support at the branches along with the copy of PAN. Online Process: Clients shall also be given an option to reactivate the accounts which are marked as Dormant. Client can use the "Reactivate Account" facility given online. Call and Trade Desk: Clients shall also be given an option to reactivate the accounts by calling at call and trade desk, client has to give PAN + User ID for activating his account through call and trade desk

For MBL & COMPANY LIMITED

Suneeta

JT. Managing Director