



The Wealth Creator

Star Finvest Private Limited

MEMBER : National Stock Exchange of India Ltd, Bombay Stock Exchange Ltd, MCX, Depository Participant-NSDL
Regd. Office : 311, Arunachal Building, 19, Barakhamba Road, Connaught Place, New Delhi-110001
Phone : 43070700 (30 LINE), FAX : 011-23351305
CIN : U67120DL1999PTC377707, E-mail : star@starfinvest.in, Website : www.starfinvest.in

STAR FINVEST PRIVATE LIMITED

INACTIVE CLIENT POLICY

This document outlines the policy & minimum procedures for classification and re-activation of inactive accounts for non-institutional clients. This does not apply for institutional clients.

Definition of Inactive Trading Accounts:

In case of trading account, the term inactive account refers to such account wherein any of below mentioned activities has not been carried out by client since last 24 (Twenty-Four) months:

- Trading or participation in OFS/buy-back/Open Offer across any of the exchanges/segments* of the exchanges through the same Member or
 - *Cash/Equity Derivative/ Currency Derivative/ Commodities Derivative/EGR /Debt/Online Bond Platform/ Execution Only Platform /Any other segment as may be allowed by SEBI/stock exchanges from time to time.
- Transaction in nature of applying/subscribing IPOs (where the IPO bid is successful & not cancelled)/SGBs/Mutual Funds (lumpsum investment or investments through successful SIP instalment payments) on the Mutual Fund platform of the stock exchanges through the same Member or
- Modification/updation of e-mail Id/Mobile Number/Address in KYC record of client through the same Member and the same has been uploaded to KRA to ensure Validated/Registered status.

Identification of inactive Accounts

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

Once the account is marked as inactive, the client will not be able to place any orders in any trade segments.

Reactivation of Client account

Client can get his account reactivated only on fulfilling the following requirements:

- Mandatorily comply with In-Person Verification/Video In-Person Verification (IPV/VIPV) requirement specified in the SEBI Master Circular on KYC dated October 12, 2023.



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- Seek confirmation from the client if there is any change in clients' basic details such as Address, Mobile number, Email ID, Bank/DP account, income, etc. as registered with us. In case of changes in any of the said details, we shall seek the updated details along with the necessary documents and update in its records as well in the UCC records of the respective Exchanges. In case of KRA Validated status or Registered status through same intermediary cases, we may fetch the details along with the necessary documents from the KRA record and display the said details for confirmation of the client and updation in its record. If there is change, then we shall update the UCC records of Exchanges as well as KRA. If client has confirmed that there is no change, we shall maintain the verifiable logs of the same.
- Notwithstanding anything contained above, in case a client seeks re-activation then we shall verify client status as per KRA and if the client status as per KRA is not validated (i.e. "On hold"/"Rejected"/"Registered" through other intermediary, etc.) then we shall seek basic details like Address, Mobile number, Email ID, Bank/DP account, income, etc. along with the necessary documents as required by KRA and upload the same to KRA to ensure validated/registered status as per KRA before permitting client to trade on the Exchanges.

Return of Clients assets

All the assets of the inactive client should be settled monthly / quarterly basis as per client's preference in the manner prescribed from time to time. The unsettled securities or fund due to non-traceability of client/s shall be transferred to separate dedicated Client Bank/Client collateral Demat account. Keep audit trail of follow up with clients.

Closure of Inactive accounts

Account Closure may be initiated when the Company receives a specific request from the client to close his trading account and undertakes to clear all outstanding dues. Alternatively, the company may initiate involuntary closure by giving a notice of 30 days to the client and proceed to recover outstanding dues, if any from the client towards settlement of any outstanding obligations.

For Star Finvest Private Limited


Rajesh Sehgal
Compliance Officer

Date: 01-11-2024

