INACTIVE / DORMANT CLIENT ACCOUNT POLICY

GOODFLOW SECURITIES PRIVATE LIMITED

1. Objective

This Policy lays down the framework for identification, monitoring, treatment and reactivation of inactive/dormant client accounts maintained with Goodflow Securities Private Limited ("GFS" / "Company").

The objective is to protect client assets, prevent unauthorised transactions and ensure appropriate due diligence before reactivation of an inactive account.

2. Classification of Inactive Account

A client trading account may be classified as **Inactive/Dormant** where there has been no trading transaction initiated by the client for a continuous period of **12 months**.

For this purpose, the last trading activity of the client shall be considered for determining the period of inactivity.

The classification of an account as inactive shall not affect the client's ownership of securities or funds lying to the client's credit.

3. Monitoring of Inactive Accounts

GFS shall periodically identify accounts which have crossed the prescribed period of inactivity.

The Company shall maintain appropriate records of such accounts and shall monitor the funds and securities, if any, lying in such accounts.

Inactive status shall not be treated as permission for GFS to utilise or transfer client funds or securities for any purpose other than as permitted under applicable SEBI/exchange/depository requirements.

4. Treatment of Client Funds and Securities

Client funds and securities belonging to an inactive client shall continue to be dealt with in accordance with applicable SEBI, Stock Exchange, Clearing Corporation and Depository requirements.

Where funds/securities are required to be settled, returned or transferred pursuant to applicable regulations, GFS shall undertake such settlement/transfer in accordance with the applicable regulatory framework.

Classification of an account as inactive shall not result in forfeiture of any client asset.

5. Restrictions on Inactive Accounts

GFS may apply appropriate controls/restrictions to an inactive account to prevent unauthorised transactions.

Any transaction or service requiring reactivation of the account shall be permitted only after completion of the prescribed reactivation process.

6. Procedure for Reactivation

A client whose account has been classified as inactive may request reactivation by submitting a request through the prescribed channel of GFS.

Before reactivation, GFS may undertake such checks as are required under applicable regulatory requirements, including:

- verification of the client's identity and KYC details;
- verification/updation of registered mobile number and email ID, wherever required;
- verification of bank/demat details, wherever applicable;
- confirmation/validation of the client's request for reactivation; and
- completion of any applicable KYC, IPV/video verification, authentication or other due diligence requirements.

The account shall be reactivated only after satisfactory completion of the applicable checks.

7. Change in KYC / Client Details

Where the client's KYC or other particulars have changed during the period of inactivity, the client shall be required to update the relevant information and provide supporting documents as may be applicable before reactivation.

8. Client Communication

Where considered necessary, GFS may communicate with clients regarding the status of their inactive account and the procedure for reactivation through their registered communication channels.

9. Regulatory Compliance

The Company shall comply with all applicable SEBI, Stock Exchange, Clearing Corporation, Depository and other regulatory requirements relating to inactive/dormant client accounts, client funds and securities.

In case of any change in applicable regulatory requirements, this Policy shall be read and implemented in accordance with such amended requirements.

10. Review of Policy

This Policy shall be reviewed periodically and amended as may be necessary to remain aligned with applicable regulatory requirements and the Company's operational framework.

For Goodflow Securities Private Limited

Approved By: _____
Name: Harshit Mukesh Taliwal
Designation: Director / Authorised Signatory
Date: