

Dormant Accounts Policy

Policy

Stone Edge Capital Ltd (hereinafter the “Company”) is an investment firm established in the Republic of Cyprus and authorised by the Cyprus Securities and Exchange Commission (the “CySEC”) pursuant to the Law 87(I)/2017, to provide one or more investment services to third parties or/and perform one or more investment activities in accordance with its Cyprus Investment Firm (“CIF”) authorisation.

The Company has established and implemented a Dormant Accounts Policy (the “Policy”), which has been approved by the Board of Directors and has been incorporated in the Company’s IOM. It is noted that the Policy must be followed by the Company at all times.

The Company reserves the right to amend the current Policy at any time if such amendment is needed as a result of any amendments of the law, any regulations or for any reason the Company considers as a proper reason to amend the Policy.

An account is considered as dormant when:

- In case of zero credit balance, the account has been opened over a period of one (1) year and during that period no transactions have been carried out in relation to the account by or on the instructions of the holder of the account.
- In case of a positive credit balance, the account has been opened over a period of two (2) years and during that period no transactions have carried out in relation to the account by or on the instructions of the holder of the account.

An account is NOT to be treated as dormant under the following circumstances:

- The Company was explicitly instructed from the holder of the account to “hold mail” and to avoid any communication with that person in any other means.
- Under the terms of the account, withdrawals of cash or securities are prevented or there is a penalty or other disincentive for effecting such actions.
- The holder of the account has other active account(s) and the Company maintains direct communication with him.

Procedure

Clients will be subject to ongoing monitoring since the date they have been approved by the AMLCO and/or Senior Management and entered into a business relationship with the Company.

The Company shall review all Client documentation and information, as required by Law. The review shall be performed regularly and at least on an annual basis. During the review process, the Company shall monitor the activity of the Clients’ trading account.

Once an account is treated as Dormant, the Client will be informed accordingly via email, stating:

- (a) that the account is classified as dormant due to the absence of trading activity for a specified period of time, depending on the credit balance of the trading account;
- (b) the right of the Client to reactivate his/her account, along with the requirements for reactivation;
- (c) the right of the Company to reset the password for security purposes.

Where a Client's trading account has a credit balance, a request to withdraw funds will be made to the client within a given time period. The Company shall take all reasonable steps to ensure contact with the client. If no action is taken by the Client, the company will investigate the matter and act accordingly and on the best interest of the Client.

The dormant accounts procedure falls under the responsibility of the Back Office and Compliance Departments.

Charges

There are no fees or charges imposed to dormant accounts.

Reactivation of a dormant account

For the reactivation of a dormant account, the Client shall contact and inform the Company about his/her wish to reactivate his/her trading account. The Client's dormant account will then be reactivated (Active Account), subject to the provision of all the required KYC documentation and any other relevant information by the Client. Once all the information is gathered, the Client shall proceed with at least one (1) of the following:

- i. deposit funds into the Client's account;
- ii. place a trade;
- iii. open or close positions.

If the above procedure is not completed by the Client, then the account will remain dormant.

Closure of a dormant account

A dormant account shall be closed following the written request of the Client. If the Client does not explicitly request the closure of his/her trading account, then the account shall remain dormant.