

July 2023

# Inactive / Dormant Accounts Policy

This Policy outlines the treatment of Dormant/Inactive accounts held by clients with Wisdompoint Capital Ltd (hereafter the “Company”).

1. **Dormant:** An account is classified as Dormant if there is no trading activity for more than six (6) months. For clarity, trading activity refers not only to the number of trades executed but also encompasses the act of trading itself.
2. In cases where the Client’s Trading Account remains Dormant for 12 months and no trades have been executed during this period, the Company reserves the right to close the account and terminate the agreement unilaterally with a written notice.
3. **Inactive:** If a Client does not activate the account with the Company, meaning no funds have been deposited and no transactions have been made, the account is considered Inactive.
4. Should the Client’s Trading Account remain inactive for more than 6 months from the date of account opening, the Company has the right to close the account and terminate the agreement unilaterally with written notice.
5. Reactivation of the Client's Account is possible upon funding the balance. Approval from a Back Officer is required for the removal of the dormant classification.
6. **Inactivity Fee:**
  - a. If an account under the Smart and Fix tariffs remains dormant for over 12 months, a monthly inactivity fee of €15 will be charged, and for accounts on the Super tariff, the monthly fee stays unchanged.
  - b. For outdated tariffs, the monthly fee is set at €11.
  - c. The Company is committed to providing clear and easily accessible information on the website regarding inactivity fees. The size of the inactivity fee is determined by considering maintenance and administrative costs.
  - d. Clients will be informed when their account is nearing the ‘inactive’ status and will receive a notice before the inactivity fee is charged.

7. This policy is subject to variation based on rules, regulations, exchanges, or other authoritative bodies or in accordance with the Company's internal policies. This Dormant account policy complements the Net Assets Value monitoring in Dormant accounts as per the Anti-Money Laundering Policy of the Company.

All CIFs, including Wisdompoint Capital Ltd, must ensure that their inactivity fee policies are in line with the regulatory expectations and requirements detailed in the circular. Ensuring transparent, fair, and timely communication with clients about inactivity fees is essential to maintain trust and compliance.