

Client Code Modification and Error Code Policy

➤ **BRIEF CRITERIA ABOUT CLIENT CODE MODIFICATION**

Stock Exchanges provide a facility to modify client code after the trade has been executed to rectify any error or wrong data entry at the time of punching orders. However, such Client Code Modification is subject to certain guidelines issued by SEBI and the Stock Exchanges in this regard. “Error Trades” means the trades which will be modified / to be modified / allowed, to be modified subject to guidelines of the SEBI / Stock Exchanges and this policy. The Exchange has provided the facility of client code modification only with a view to rectify genuine errors.

The facility is mainly to provide a system for modification of client codes in case of genuine errors in punching / placing the orders. It is to be used as an exception and not a routine. To prevent misuse of the facility Stock Exchanges levy penalty / fine for all non-institutional client code modifications.

This policy is applicable to all Client Code Modifications carried out / to be carried out in any of the client accounts, subject to guidelines issued by the SEBI / Stock Exchanges from time to time, in any segment of any exchange of which the company is a Member.

➤ **DETAILS ABOUT GENUINE ERROR**

The following trades shall be modify/ allowed to be modify, shall be treated as genuine error and transferred to Error Account.

- I. Punching error / typing error of client codes due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
- II. Trade entered for wrong client due to any miscommunication from the client / authorized representative of the client.
- III. Client code/name and modified client code/name are similar to each other but such Modifications are not repetitive.
- IV. Family Code (spouse, dependent parents, dependent children and (HUF)
- V. Institutional trades modified to broker error/pro account.

➤ **THE BOARD AND MANAGEMENT DIRECTIVES**

The Board and Management have approved under mention policy in this regard and instruct all the office bearers to follow it strictly.

- 1(a) To control the punching error, it has been decided that client code mapping will be restricted in trading terminals.
- 1(b) To create a separate error account in the name of **“ERROR”** as per the exchange circular.
- 1(c) To maintained Client Modification registers with immediate effect for recording

- the errors.
2. Dealers are advised to hear patiently the client code /scrip name and reconfirm the same to their best possible efforts before placing order into the system.
 3. Department head/ compliance officer are advice to analyses the mistake and to take /implement corrective measures to their best possible efforts to minimize.
 4. Department Head/ Compliance officer are advice to update the report to the Board / management on the implementation of the said policy periodically.

➤ **REPORTING SYSTEM**

1. Client code modification issues should be reported to the Operation-Head and can be done only after getting approval after knowing it's genuinely as per exchange directives.
2. Any client code modification shall be subjected to this policy be carried at Head Office of the company.
3. The company review every day the Error Account file send by the Exchange.
4. A separate register to be maintained by the company for above purpose where full details will be recorded.