

CLIENT CODE MODIFICATION AND ERROR CODE POLICY

Client Code Modification is a massive problem of the organization. The main objective is to framed a policy for modification of client code for post trade execution and takes the report on such modification of client codes. Further educate the dealers and create awareness among them about this policy.

• Brief criteria about Client code Modification

Client code modification means modification of client code after the execution of trade. The stock exchange provides a facility to modify the client code to rectify an error. Further only the genuine errors will be modify and after being transferred to 'Error Account'. The modification should be done within the Stock Exchange guidelines. The modification of client code is to be done only in exceptional cases and not in routine case.

• 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)

• Example of Genuine Error

The criteria for determining the genuineness of client code modification are as follows:

- Client code 4006 wrongly entered 10011 would be constructed as intentionally committed whereas 4006 entered as 4003 or 4007 may be a genuine punching error.

• Directives

The Proprietor has approved under mention policy in this regard and instructs all the office bearers to follow it strictly.

(I)

(a) To control the punching error, it has been decided that to change Client Code in NEAT system in trading terminals.

(b) To create a separate error account in the name of "**Error Account**" as per the exchange circular.

(c) To review periodically list of inactive clients.

(II) 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.

(III) Compliance officer is advised to analyse the mistake and to take /implement corrective measures to their best possible efforts to minimize.

(IV) Proprietor / Compliance officer taking initiative to implementation of the said policy periodically.

• **Reporting System**

• Client code modification issues should be reported to the Key Personnel's and can be done only after getting approval after knowing it's genuinely as per exchange directives.

• Any client code modification shall be subjected to this policy

• We review every day the Error Account file send by the Exchange.

• **Reference to the Circular**

• SEBI – Circulars No. – CIR/DNPD/6/2011 dated January 01, 2011

Circulars No. – CIR/DNPD/01/2011 dated July 05, 2011

• NSE – Circular No. - NSE/INVG/2011/596 dated February 17, 2011

Circular No.- NSE/INVG/2011/18484 dated July 29, 2011

Circular No. - NSE /INVG/2011/870 dated August 26, 2011.

For Ashish Vaid

Proprietor