

Objective:

Client Code Modification is a massive problem of the organization. The main objective of the company 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. To Prevent misuse of the facility Stock Exchanges levy penalty/fine for all non-institutional client code modifications.

Details about the Genuine Error:

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

- 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.
- Trade entered for wrong client due to any miscommunication from the client/authorized representative of the client.
- Client code/name and modified client code/name are similar to each other but such Modifications are not repetitive.
- Family code (Spouse, dependent parents, dependent children and HUF)
- Institutional trades modified to broker error/pro account.

In case of NSE (NOTE: no consistent pattern in such modifications):

Client code/name and modified client code/name are similar to each other but such modifications are not repetitive.

Relative Code (spouse, dependent parents, dependent children and HUF) as defined under the companies Act, 1956.

Example of Genuine Error

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

Client code TV8118 wrongly entered TA4114 would be constructed as intentionally committed where as TV8118 entered as VT8118 or VT1188 may be a genuine punching error.

In Case of BSE:

- Punching error/typing error of client code due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
- Trade entered for wrong client due to any miscommunication from the client/authorized representative of the client.
- Modification within family members.
- Institutional trades modified to broker error/pro-account

In Case of MCX-SX:

- Punching error/typing error of client code due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
- Trade entered for wrong client due to any miscommunication from the client/authorized representative of the client.

General Conditions:

- The facility for Client Code Modification can be used only in case of Error Trade.
- The Client Code Modification shall be carried out only on the designated system and / or as per the process as may be prescribed by SEBI/ Stock Exchange.

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 be carried at Head Office of the company.

The company review every day the Error Account file send by the Exchange.

A separate register to be maintained by the company for above purpose where full details will be recorded.

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 February17, 2011
 Circular No.-NSE/INVG/2011/18484 dated July 29, 2011
 Circular No.-NSE/INVG/2011/870 dated August 26, 2011