MEMBER: TRADEWELL SECURITIES LIMITED
NATIONAL STOCK EXCHANGE
BOMBAY STOCK EXCHANGE
MULTI COMMODITY EXCHANGE OF INDIA LIMITED

Client Code Modification and Error Code Policy

Objective

The main objective of the policy is to deal with Client Code Modification after the execution of Trade and to create awareness amongst the relevant staff such as Dealers, Branch In-Charges, Compliance Officer, Sub-Broker and Authorised Person

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.

Penalty

As per the Exchange circular, the Stock Exchange shall levy penalty to the Trading Member for Client Code Modification

Genuine error

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

1. Errors due to communication and/or Punching or Typing such that the Original Client Code and the Modified Client Code are similar to each other
2. And modification within relatives
3. Institutional trades modified to Broker Error/Pro Account.

Policy

Dealers are advised to hear patiently the Client Code/Scrip Name and reconfirm, the same to their best possible before placing the order.

Modification in Client Codes

1. Any Trade shifted to the Error Account are subsequently liquidated/Closed out in the Market and is not to be shifted to some other Client Code. New order would be placed in original code.
2. Client code modification issue should be reported to Compliance Officer or Concern Operations In-Charge at Head Office for approval and it should be approved only after verification as per SEBI / Exchange Circulars issue time to time
3. The Compliance Officer or Concern Operations In-Charge should see to that the same information has to be intimated/uploaded to Exchange on the same day.
4. A separate account by name "ERROR" is to be opened and UCC to be uploaded to Exchange
5. The modification of client code should be done only in exception cases not in routine case.
6. The access / rights of Client Code modification should be given only to a Officers as are approved by Head of Operations or by Compliance department.
7. Head Operations / Compliance Officer are advised to analyse the mistake for genuineness of code modification, verify the facts which indicates the intention to impact one investor over other by transferring profit/losses to from.

Reporting Process

1. Department Head/Compliance officer are advice to update the modified cases report to the Board/ Management on the implementation of the said policy periodically

Approval Process

This policy is approved by Board of Directors with the following conditions

1. This policy may be reviewed as and when there are any changes introduced by any Statutory Authority or as and when found necessary due to Business needs
2. A copy of policy shall be made available to all the relevant staff such as Dealers, Branch In-Charge, Compliance Officer and Authorised Persons.
   3. A separate register to be maintained by the company for above purpose where full details will be recorded