

Policy for Client code Modification

(Version 2023-24)

SEBI vide its circular dated January 03, 2011 has issued guidelines pertaining to parameters to be put in place by the stock brokers for identification of client code modifications, arising as a result of genuine error or wrong data entry while placing online/offline trades. In order to give effect to the said guidelines we advise all dealing/operational staff of the Company to observe the following code of conduct:

1. Genuine punching errors in client code may be allowed to be modified subject to the verification of genuineness as mentioned below.
 - a. Error in communication of code by investors when they have holding in one account and the code being communicated is that of other account like HUF or business entity represented by them.
 - b. Misinterpretation of communication as to what Investor speaks and what Dealer listens because of similar sounding alphas and numbers like 'B' is being heard as 'P' etc. as generally the dealing room environment is very noisy.
 - c. Shifting of character positions like 4356 is punched as 4536 or one serial up or down.
 - d. Order getting punched in hurry in the previously retained code. All the front-end application has facilities to retain code of last punched order in order entry window and most of the dealers use this feature to speed up the order entry process.
 - e. Wrong trades due to the mistake of dealers like 'Buy' order punched as 'Sell' or error in quantity or prices.

Such trades needs to be owned up by the Trading Member and has to be transferred to 'Mistake/Error Account' of the Trading Member.

- f. Punching error of "O" from "0 (Zero)" or vice a versa.
2. Following guidelines are required to be followed for changing the client code during and post trading hours.

During Trading Hours

- a. Client code modification facilities are available at all the dealer terminals and shall be reported to the Department Head/authorized officials and it has to be carried out only after taking due approvals from authorized officials/ Department Head.
- b. Complete records of daily online trade modifications shall be maintained in soft form by Front Office Operation Team.

Post Trading Hours

- a. Such client code modification shall be carried out through back office system to do the needful on receipt of duly filled & signed Annexure 1 enclosed herewith.
- b. In most of the cases for Futures & Options and Currency Derivative segment, the errors would be rectified with the consent of the client by reversing the trade in next trading session and the rate differences shall be set off by passing JV entry in the ledgers of affected clients. In the rest of the cases trades may be rectified by moving both legs of the trades to the account of actual client instead of settling it through JV entry.

For Cash segment any such errors would be rectified after verifying genuineness of error.

A register / file shall containing required details shall be maintained for all such modifications.