

POLICY FOR CLIENT CODE MODIFICATION/ERROR ACCOUNT

(Applicable for all exchange/segment)

- Genuine punching errors in client codes while placing orders shall be allowed to be modified.
- Client code modification facilities shall be disabled from all the dealer terminals.
- Client code modification shall be carried out only from the admin terminals located at H.O. surveillance desk by Mr. Harish Kumar Singhania- Authorised Signatory).
- While carrying out code modification, genuineness of the punching errors shall be verified against corroborative circumstantial evidences like similarities of codes, trades in immediately preceding codes, square off trades without holdings or position or any such other evidences shall have to be taken into account.
- Complete records of daily online trade modifications shall be maintained in soft form.
- Shifting of any trade (Institutional or non institutional) to the error account of the HKS shall not be treated as modification of client code under SEBI circular dated July 5, 2011, provided the position arising out of trades in error account are subsequently liquidated/closed out in the market and not shifted to some other client code.
- HKS would be required to disclose the client codes which are classified as 'Error Accounts' to the Exchange at the time of UCC upload.
- We review on weekly basis whether any client code has been modified.
- Training regarding punching orders in proper manner is being carried out so that errors should not be repeated further any trade executed by error is being set aside in 'Error Code' and the same is being monitored by Director and Compliance Officer as no one in Back Office can change the code in any other client's name.

For M/s Harish Kumar Singhania & Co

Compliance Officer