

POLICY FOR CLIENT CODE MODIFICATION/TRANSFER OF EXECUTED TRADE

CLIENT CODE MODIFICATION DURING MARKET HOURS

On execution of trade, Dealer immediately informs Client on telephone or confirms trade if client is personally sitting in office. If client does not confirm the trade or refuses to confirm the trade as the said trade is contrary to his instructions and is not belonging to him, Dealer immediately take steps to find the correct client code as per the records and informs the Director about dealing punching error. If there is genuine mistake by client in informing the client code while giving order, we confirm the same and do the necessary changes after taking compliance officer and Management into confidence and report the same. . After filling Error report and signing the same, Director authorizes the client code change. If there is a genuine punching mistake and client code entered is non existent, after filling Client code Error Sheet and taking approval from Director, correct client code is entered in the system.

CLIENT CODE MODIFICATION AFTER MARKET HOURS

Client code modification after market hours is done on an exceptional basis only. If a Dealer could not contact a client during market hours immediately after execution of trades and client refuses to accept the trade or client code is nonexistent, Dealer inquires other clients mapped with his terminal and on getting correct client code, after filling Client code Error Sheet and taking approval from Director, correct client code is entered and system upgraded accordingly.

Monitoring mechanism in place to review such transfer of trades.

Management has proper Monitoring mechanism in place to review such transfer of trades. Each code change is reviewed by Management in order to ensure that there is no regular pattern observed. Also number of daily punching errors made by each Dealer is reviewed and based on findings they are warned and instructed to be more careful and attentive. Even clients are called upon to find out reason for such code changes.

Steps taken to find out reason for such transfer

For each client code change, Management asks Dealers to write reasons for the same in Client code Error Sheet. Unless Management is satisfied with genuine reason, no client code change is permitted.

Steps taken to avoid such Instances of errors

As mentioned above, Dealers are asked to write reason in Client code Error Sheet. Daily monitoring of such client code changes are done by Management and Dealers are instructed to remain careful while punching/executing the trades. Daily trades of a Client are monitored if there are any modifications are observed in a day/week and such clients are not allowed to trade unless Management is satisfied with the reasons given by such client.