

POLICY ON CLIENT CODE MODIFICATION

ADOPTED BY

GIRIRAJ STOCK BROKING PRIVATE LIMITED

**MEMBER: BSE LTD
NSE LTD**



Policy on Client Code Modifications:

Introduction:

Giriraj Stock Broking Private Limited is a SEBI registered Stock Broker of BSE Ltd & NSE Ltd.

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 modified and transferred to 'Error Account'. The modification shall be done within the Stock Exchange guidelines.

Client Code Modification and Error Code:

1. The modification to the client code is to be done only in exceptional cases and not as a routine one.
2. The reason for modification has to be ascertained and analysed and genuineness is to be established and also its impact on the clients should be studied before the modification. In cases where voice recording is in practice, the same should be studied.
3. Normally as a principle, other than for punching errors, no modification to the client codes is allowed. The trade modification policy in the aforesaid exceptional cases is centralised. No transfers shall be made from the Error code to the Client Code.
4. Therefore it is imperative that the issue should be reported to the senior level Manager/Director and only with his approval, the modification should be carried after being satisfied that it is genuine, the same is required to be done to protect the interests of the client.
5. Hence the facility to modify the client codes should be available only at the Corporate Manager level and should not be given to the branches/franchise/sub-brokers.
6. Training program should be conducted to all the Dealers and they should be explained how code modifications can be misused and what steps should be taken to avoid the same. It also should be explained that code modifications should not be encouraged to the clients except for cases like 'punching errors'/'typing errors'.
7. A register is to be maintained for recording all the code modifications with details like error code, correct code, scrip name quantity, client name, the name of the dealer who punched the code, the explanation of the dealer/Branch Manager, the 'analysis /study' of the authorized Manager and his Approval / disapproval for modification.
8. Finally the decision of the authorised Manager should be ratified later by the Director



9. There shall be weekly review of the Client Code Modification by the Director to ensure that the Company is diligently following and adhering to the policy

For Giriraj Stock Broking Private Limited

Vinay Jajodia

**Vinay Jajodia
Compliance Officer**