

## CLD Policy

### Error Account Policy

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 analyzed and genuineness is to be established and also it's impact on the clients should be studied before the modification. If voice recording is in practice, the same is being studied.
3. Normally as a principle, we are permitted to change client codes of non-institutional clients only for the following objective criteria;
  - a. Error due to communication and/or punching or typing such that the original client code/name and the modified client code/name are similar to each other.
  - b. Modification within relatives (Relative for this purpose would mean 'Relative' as defined under sec. 6 the Companies Act, 1956).
4. For easy identification of error account, we register a fresh client code as "ERROR" in the UCC database of the Exchange for the account which is classified as error account.
5. We will inform the Exchange by end of day, the reasons for modification of client codes of non-institutional trades based on the aforesaid objective criteria.
6. 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.
7. 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.
8. 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

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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'.

#### **Review Policy:**

This policy may be reviewed as and when there are any changes introduced by any Statutory authority or as and when it is found necessary to change the policy due to business needs.

The policy may be reviewed by the Managing Director / Compliance Officer Mr. Lakshmikanth Inani place the changes, if any in policy before the Board of Directors

#### **Approval Authority:**

This policy is as approved by the Board of Directors in its Board Meeting held on 14.02.2023.