

## SANTOSH KUMAR KEJRIWAL SECURITIES PVT LTD

### **Client Code Modification and Error Account Policy**

1. Client code modification is not allowed, the modification to the client code is to be done only in exceptional cases subject to the approval of management.

1. The reason for modification has to be ascertained and analyzed and genuineness is to be established and also its impact on the clients should be studied before the modification. If voice recording is in practice, the same is being studied.

1. 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. No other modification to the client codes will be allowed.

1. For easy identification of error account, we register a fresh client code as **“ERROR ACCOUNT”** in the UCC database of the Exchange for the account which is classified as **“ERROR ACCOUNT”**.

1. 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.

1. 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.

1. 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’.

1. Any offline back office client code modification is strictly prohibited, under any circumstances

1. Errors due to wrong punching by the dealers for both (Institutional or non institutional) trades are required to be shifted to the error account of the trading

member and the positions arising out of trades in the error account are to be subsequently liquidated / closed out in the market and not shifted to some other client code.