

Introduction – Jambuwala Commodities Private Limited is full-service broking houses, which are a Trading Member of Bombay Stock Exchange Limited (BSE), National Stock Exchange of India Limited (NSE), Multi Commodity Exchange Limited (MCX) and National Commodity & Derivatives Exchange Limited (NCDEX) Bearing SEBI Registration No. INZ000056036 and a Depository Participant with CDSL SEBI Reg. IN – DP – 527 – 2020.

Client Code Modification and Error Code Policy

Client Code Modification is a massive problem of the organization. The main objective of the company to framed a policy for modification of client code for post trade execution and takes the report on such modification of client codes. Further educate the dealers and create awareness among them about this policy.

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 after being transferred to 'Error Account'. The modification should be done within the Stock Exchange guidelines. The modification of client code is to be done only in exceptional cases and not in routine case.

Details about Genuine error

The following trades shall be modify/ allowed to be modify, shall be treated as genuine error and transferred to Error Account.

- I. Punching error / typing error of client codes due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
- II. Trade entered for wrong client due to any miscommunication from the client /authorized representative of the client.
- III. Client code/name and modified client code/name are similar to each other but such modifications are not repetitive.
- IV. Family Code (spouse, dependent parents, dependent children and HUF).
- V. Institutional trades modified to broker error/pro account.

Example of Genuine Error

The criteria for determining the genuineness of client code modification are as follows:

- Client code FA1234 wrongly entered MN5678 would be constructed as intentionally committed whereas FA1234 entered as AF1234 or FA2341 may be a genuine punching error.

The Board and Management have approved under mention policy in this regard and instruct all the office bearers to follow it strictly.

- a) To control the punching error, it has been decided that client code mapping will be restricted in trading terminals.
- b) To create a separate error account as per the exchange circular.

- c) To maintained Client Modification registers with immediate effect for recording the errors.
- d) To review periodically list of inactive clients for marking in CTCL Surveillance system.
- Dealers are advised to hear patiently the client code /scrip name and reconfirm the same to their best possible efforts before placing order into the system.
- Department head/ compliance officer is advice to analyses the mistake and to take/implement corrective measures to their best possible efforts to minimize.
- Department Head/ Compliance officer is advice to update the report to the Board/management on the implementation of the said policy periodically.

Reporting System

Client code modification issues should be reported to the Key Personnel's and can be done only after getting approval after knowing it's genuinely as per exchange directives.

Any client code modification shall be subjected to this policy be carried at Head Office of the company.

Policy Reviewed and Authorised by

Mr. Kamal Shah
Director