

## Policy for Client Code Modification

### 1. Objective

To frame the guidelines for modification to client codes post trade execution and reporting of such Client Code Modifications.

### 2. Brief about Client Code Modification:

Client Code Modification means modification / change of the client codes after execution of trades. Stock Exchanges provide a facility to modify any client code after the trade has been executed to rectify any error or wrong data entry done by the dealers at the time of punching orders. However, such Client Code modification is subject to certain guidelines as to the time limit within which the client code modification is to be carried out, terminal / system on which such modifications can be done etc. The facility is mainly to provide a system for modification of client codes in case genuine errors in punching / placing the orders. It is to be used as an exception and not a routine. To prevent misuse of the facility Stock Exchanges levy the penalty / fine for all non-institutional client code modifications.

### 3. Scope of the Policy:

This policy covers all the Client Code Modifications carried out / to be carried out in any of the client accounts controlled by Delhi HO, subject to the guidelines issued by the SEBI / Stock Exchanges from time to time, in any segment of any exchange for which VARDHAMANGLOBAL is a member broker.

### 4. Definitions:

(a) **“Approving Authority”** for the purpose of approval of any client code modification for any Error Trade means the persons mentioned herein under:

Mr. YASH GANGWAL

Mr. SHUBHAM GANGWAL

(b) **“Error Trades”** means the trades which will be modified / to be modified / allowed, to be modified subject to guidelines of the SEBI / Stock Exchanges and this policy.

For the purpose of this Policy, only the following types of trades shall be modified / allowed to be modified:

(i) Wrong Trade which has occurred due to any genuine error or mistake in order entry, while punching the order, by any of dealer of VARDHAMANGLOBAL

(ii) Wrong Trade which has occurred due to any miscommunication from the client / authorized representative of the client.

(iii) Trade which any of the Designated Director, who is overall in charge of trading operations, at his / her discretion considers or deem it fit and declare the trade to be an Error Trade.

(c) VARDHAMANGLOBAL in its capacity as member broker of stock exchange(s).

**5. General Conditions:**

- (i) The facility for Client Code Modification can be used only in case of Error Trade.
- (ii) The Client Code Modification shall be carried out only on the designated system and / or as per the process as may be prescribed by SEBI / Stock Exchange.
- (iii) *The Client Code Modification shall not be permitted at the request of any non-Institutional Client when there is no error or mistake in punching the order / trade by the Dealer of the VARDHAMANGLOBAL.*
- (iv) The modification of trade from any Institutional client to any non-Institutional client and *vice-versa* shall not be permitted.

**6. Place for Client Code Modification:**

Any Client Code Modification shall, subject to compliance of this policy, be carried out by:

- (i) By RMS – all the Error Trades happened in Capital Market Segment of NSE and BSE in any of the clients controlled by HO including the client of any branch / sub broker / AP under HO.
- (ii) By Operations – all the Error Trades happened in F&O of NSE or Currency Derivatives Segment of NSE.

**7. Procedure for Client Code Modification for Non - Institutional Error Trades:**

- (i) When any Error Trade is happened, the concerned Dealer will forthwith inform his / her head of Department about such trade.
- (ii) The concerned dealer shall forward Client Code Modification Approval Form for Retails (CCMAFR) as given in this policy to his / her Head of Department for verification, who will in turn forward the same to the Approving Authority for approval.
- (iii) The Approving Authority may approve or reject the CCMAFR. If the CCMAFR is rejected, the Approving Authority shall forward the rejected CCMAFR to the concerned Dealer and / or his Head of Department with a copy to Compliance Department.
- (iv) If the CCMAFR is approved, the same shall be forwarded to the RMS or Operations as the case may be. The approved CCMAFR is to reach RMS / Operations at the earliest and in no case beyond 20 minutes after closure of the market hours of the concerned stock Exchange. The duly approved CCMAFR may be sent in hard copy, through fax or by an e-mail.
- (v) Upon receipt of the duly approved CCMAFR, the RMS & Operations shall carry out the necessary Client Code Modification as per the system / process of the concerned stock exchange.
- (vi) After the Client Code Modification, the RMS & Operations shall inscribe the status and details of such modification in CCMAFR and also intimate the concerned Approving Authority about the status of the Client Code Modification.
- (vii) A copy of such CCMAFR shall be forwarded to the Compliance Department for records and MIS.
- (viii) The penalty or fine, if any, levied on VARDHAMANGLOBAL for any wrong trade occurred due to any miscommunication from the client / authorized representative of the client shall be borne by the client.

