

CLIENT CODE MODIFICATION POLICY

BACKGROUND:

This policy shall apply to all the whole company and all its employees. These policy is for internal use of **Mili Consultants & Investment Pvt. Ltd.** and it intends to draw a framework for modification of client code carried out due to error while placement of order on behalf of the client.

ORDER PLACEMENT:

Dealers of the company are required to place the order as per the instructions of the client. The dealers should mandatorily enquire about the client name and client code before accepting any order from the client. The same client code should be carefully entered on the trading screen of the Exchange in the order entry form. Abundant caution and care should be exercised while plaing the order to ensure that correct details of security, Quantity, Rate & client code is entered on terminal to minimize the possibility of data entry error at the time of placement of order on behalf of the client. The management however recognizes that, **“TO ERR IS HUMAN”** and these document deals in detail with the incident of error in entering the client code while placement of orders.

DEALING WITH ERROR:

The National Stock Exchange provides a facility for modification of client code in Cash, F&O and Currency Derivative Segment. This facility is provided only as a rectification Mechanism and it should be used only for that purpose and for no other reason whatsoever.

ACTION BY DEALER:

Upon Identification of the incident of an error while entering the client code in the order placement form. The dealer shall communicate the same to his Immediate higher up who shall coordinate with the Head Office for rectification of this error. The Head Office shall accept these request on a face to face basis upon being satisfied that it is a genuine a data entry error.

ERROR FROM CLIENT:

The client may sometimes mention a wrong client code and in such a situation the client may request the dealer to accept his instruction to modify the client code. The dealer shall forward such a request to the Head Office only in case there is a ground to believe that it was a genuine error on part of the of the client. Than trades have been transferred to error account otherwise CLD file is sent to the exchange for client code modification.

ACTIVITY AT HEAD OFFICE:

At the Head Office adequate due diligence shall be exercised while entertaining the request for the code modification. The factors to be taken in to account shall include a scrutiny of the wrong client code and it's a similarity or closeness to the correct client code that should have been entered while the placement of order, regularity or otherwise of such requests coming from a single dealer or a single location, the trades getting reversed due to such a modification, liquidity in the counter or otherwise etc. The team at Head Office shall have full discretion to seek any further clarification and may allow or carry out the requested modification with or without the satisfaction of all the above conditions.

REPORTING AT HEAD OFFICE:

All the Incidents of client code modification shall be scrutinized by the compliance Officer or the partner or both. They shall also validate the genuiness of these requests postfacto. In case it is felt necessary they shall seek clarification from the person who has carried out the modification or from the dealer who has entered the erroneous client code while placing the order.

REPORTING TO CLIENT:

In case where one existing client code is entered instead of another existing client code. The intimation of such an error shall be communicated to both the clients. In case where the client erroneous client code is not allotted to any of the existing clients, the intimation of dealing error shall be sent to the client in whose code the trades stand after such rectification. The format of the letter to be sent to the client is given as **exhibit 1** to this policy.

ACTION FOR ABUSE/MISUSE OF CLIENT CODE MODIFICATION FACILITY:

In a case where there is a genuine ground to believe that the client code modification facility has been used for any other purpose other than the rectification of a genuine data entry error, the persons responsible shall be severely reprimanded either orally or in writing as felt suitable. Repeated abuse or misuse of the system will make the persons responsible subject to disciplinary action by the management which may even extend to discontinuation of the services of persons involved.

ACCESS TO THE CODE MODIFICATION FACILITY:

The client code modification facility shall not be made available at any of the branches or Sub-Broker location and the same shall be available only to the Head Office.

MODIFICATION AND WAIVER:

No persons in this organization shall have right to modify these policy or waive any of the condition stipulated herein-above without the express permission of the management in writing. The policy shall be reviewed by the management and shall be modified taking in to account the regulatory changes or other situation that may command such a review.

For Mili Consultants & Investment Private Limited

Manak Chand Daga
Director
DIN: 00098486

Place: Mumbai

Exhibit 1:

To,
Client Name
Client Code:

Dear Sir/ Madam,

Sub. : Error in entering Client code while placement of order.

With reference to the captioned subject, you are requested to note that while executing your order on date _____ the dealer has entered a wrong client code erroneously. As a result we have modified the code in order / trade from code _____ to your code _____.

You are requested to accept the same by returning the acknowledgement to this letter.

Thanking You,
For

Compliance officer

Place : Mumbai.