

Policy on Client Code Modifications

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 its genuineness has to be analysed and also its impact on the clients is studied before the modification. If voice recording is in practice, the same is studied.
3. Normally as a principle, other than for punching errors, no modification to the client codes is allowed.
4. Therefore it is imperative that the issue is reported to the senior level Manager/Director i.e Mrs. Shikha Gupta (Director) / Mr. A.K Jain (Designated Director) and only with their approval, the modification is carried after being satisfied that it is genuine. The same is required to be done to protect the interests of the client.
5. Hence the facility to modify the client codes is available only at the Corporate Manager level and should not be given to the branches.
6. Training program is conducted to all the Dealers and they are explained how code Modifications can be misused and what steps should be taken to avoid the same. It is also explained that code modifications should not be encouraged to the clients except for cases like 'punching errors'/'typing errors'. This helps in reducing the modification of client codes.
7. A register is to be maintained for recording all the code modifications with details like error code, correct code, scrip name quantity, client name, the name of the dealer who punched the code, the explanation of the dealer/Branch Manager, the 'analysis /study' of the authorised Manager and his approval /disapproval for modification.
8. "Error Accounts" are classified properly and UCC uploaded to Exchanges.
9. If the error is detected in the Market hours then it is shifted to Error Account but if it is detected after the Market hours then it is uploaded in the Exchange portal with correct code.
10. Shifting of any trade on account of genuine error (institutional or non institutional) to error account are subsequently liquidated/closed out in the market and are not shifted to other client code.
11. Trades transferred to 'Error Accounts' are reviewed/monitored properly to check the genuineness and to prevent the use of client code modification facility for purposes other than correcting mistakes arising out of client code order entry.
12. This policy would be modified time to time as per circulars of SEBI/Exchanges.

For Frontline Capital Services Limited

Authorised signatory