

CLIENT CODE MODIFICATION POLICY

[Reference : SEBI Circular No. SEBI /HO/CDMRD/DMP/CIR/P/2016/43 29.03.2016]

Preamble –Rayalseema Bullion & Commtrade Pvt. Ltd. is a Commodity Broker member of MCX . As such, it carries out trading of its clients in respective exchange through various branch offices including offices of its sub-brokers / franchisees / authorised person etc.

While carrying out its functions as a Broker, it might happen sometimes that due to certain reasons, the client codes might not have been entered correctly at the time of either order entry or need to be changed once converted into trades so that proper and correct effect of those vary transactions can be given.

However, SEBI and Exchanges have issued various circulars in this regard. Accordingly, with a view to minimise the errors being committed in this regard, certain objective criteria for identifying genuine errors for client code modification of non-institutional trades and guidelines for the implementation of the requirement of those circulars are given below.

1. To rectify genuine error in entry of client code at the time of placing / modifying the related order, Permission of Head – RMS or such other higher authority designated by the management must be obtained prior to changing the client codes.
2. Such permission shall be given to change client codes of **non-institutional clients only** for the following criteria:
 - (a) Error due to communication and/or Punching / Typing error - Such that the original client code / name and the modified client code/name are similar to each other.

[For e.g. if the code entered by punching D001 instead of B001 due to communication error]

- (b) Modification within relatives (“Relative” for this purpose would mean “relative” as defined under the Companies Act, 2013)

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[A MEMBER OF MCX]

3. In case of shifting of any trade (Institutional or non-institutional trades) not accepted by any client, such trades MUST be first shifted to designated **"ERROR"** account and relevant position subsequently liquidated / closed out in the market. **Once, the trades have been transferred to such Error Account, the same shall NOT be shifted to some other client code.**
4. UCC for such Errors Account MUST be uploaded to respective Exchange. Accordingly, KYC Department is directed to take all necessary steps to upload the same immediately and to report about successful uploading of the same (with documentary evidences, if any) to the Compliance & RMS Team.
5. Further, the designated employee(s) MUST inform the respective Exchange (as per the mechanism established by them in this regard) on a daily basis by end of day, the reasons for modification of client codes of non-institutional trades based on the aforesaid objective criteria. Further, he/she MUST preserve all related documentary records in this regard so as to assist the Compliance Team at the time of Inspection in this regard.
6. All related employees are STRICTLY warned not to modify any client code in the back-office system or after the close of the modification window provided by the Exchange(s).
7. All concerned or deemed to be concerned employees are strictly advised to comply with this guideline or policy in true letter and spirit.

Note : The aforesaid policy is approved by the Board of Directors of the Company i.e. Rayalseema Bullion & Commtrade Pvt. Ltd. as per its meeting held on 01 April, 2017.