**MACONOCHIE &CO**

**CLIENT CODE MODIFICATION AND ERROR CODE POLICY**

**OBJECTIVE**
THE MAIN OBJECTIVE OF THE POLICY IS TO DEAL WITH MODIFICATION OF CLIENT CODE AFTER THE EXECUTION OF TRADE AND TO CREATE AWARENESS AMONGST THE RELEVANT STAFF SUCH AS DEALERS, BRANCH IN CHARGE, COMPLIANCE OFFICER, SUB-BROKERS AND AUTHORSIED PERSONS.

 **TERMS USED IN THIS POLICY**

1.**GENUINE ERRORS**: Errors due to communication and/or punching or typing such that the original client/code/name and the modified client code/name are similar to each other and modification within relatives. (‘Relative’ for this purpose would mean ‘Relative’ as defined under Companies’ Act, 1956)

2.**MODIFICATION OF CLIENT CODES**: Modification in client codes to that of ‘E0001 –‘MACONOCHIE&CO(ERROR CODE)’ , which will be subsequently closed out/liquidated and not shifted to any other client code.

 **POLICY**

Dealers are advised to hear patiently the client code / scrip code and reconfirm the same to their best possible efforts before placing order into the system. The dealer should not yield to any pressure or sense of urgency shown by the client in placing the order.

**CRITERIA FOR GENUINE ERROR**

The following instances would be considered as the genuine errors:

1. Where the Actual Client code and wrongly punched Client code are similar.

2. Error occurred due to any miscommunication from the client/authorised representative of the client.

3. Error due to wrong entry of client code among the family members of the client.

**PROCEDURE FOR CLIENT CODE MODIFICATION**

1. Any trade generated due to a genuine error shall be modified only into the account called ‘E0001 – . ‘MACONOCHIE&CO(ERROR CODE)’ The said position shall be subsequently liquidated / closed out. The new order shall be punched in the original code.

2. The occurrence of such incident shall be first reported to the compliance officer. The modification shall be carried out only at the head-office after verifying the SEBI / Exchange directives issued from time to time.

3. The compliance officer/operations in-charge shall review the Error Account Trades on daily basis.

4. A separate register has been maintained to record such occurrences.

5. An error account has been created with code ‘E0001’ and title ‘MACONOCHIE&CO(ERROR CODE)’ . The same has been uploaded to the NSE and UCC for it. ‘MACONOCHIE&CO(ERROR CODE)’

6. The access for the client code modifications is given only to the operations in-charge at Head Office. Any deviations from there shall be escalated to the compliance officer, who is also a partner of the firm.

7. The client code modification shall be done only in exceptional cases.

8. The compliance officer shall have a look at the correct code and the wrong code and satisfy himself as to the genuineness of the error. He shall further take immediate steps to avoid the repetition of the incidence.

9. Both, the compliance officer and the partners shall look at the pattern of incidence and take urgent steps to report to the exchange, the wrong doings, if any.

 **REPORTING SYSTEM**

1. Client code modifications shall be reported to all the key personnel in the organisation.
2. The firm shall review the Error Account file sent by the Exchange on daily basis.
3. A separate register is maintained at the Head Office to record full details of client code modifications.
 **APPROVAL AND REVIEW**

This policy is drafted by the partners themselves and shall stand to be reviewed periodically, as per the needs of the situation with reference to the circulars from time to time