

# **ALANKIT IMAGINATIONS LIMITED**

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## **Client Codes Modification/ Error Policy - (All Segments)**

1. This is with reference to SEBI circular ref. no. CIR/DNPD/6/2011 dated July 5, 2011 and the Exchange circular ref no. NSE/INVG/2011/18484 dated July 29, 2011 and as amended regarding modification of client codes.
2. Client code modification means modification of client code after the execution of trade. The stock exchange provides a facility to modify the client code to rectify an error. The modification should be done within the Stock Exchange guidelines. The modification of client Code (UCC) is to be done only in exceptional cases and not in routine case.
3. The reason for modification has to be ascertained and analysed and genuineness is to be established and also, it's impact on the clients should be studied before the modification. If voice recording is in practice, the same is being studied.
4. Therefore, with a view to address the aforesaid concerns, it has been decided that we will modify the client code only in case of genuine errors, under the close and direct supervision of Compliance officer and Top Management of the Company.
5. The following would constitute genuine errors with regard to client code modifications: -
  - i) Punching error / typing error of client codes due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
  - ii) Trade entered for wrong client due to any miscommunication from the client /authorized representative of the client.
  - iii) Client code/name and modified client code/name are similar to each other but such Modifications are not repetitive.
  - iv) Family Code (spouse, dependent parents, dependent children and HUF)
  - v) Institutional trades modified to broker error/pro account.
  - vi) Modification within relatives ('Relative' for this purpose would mean "Relative" as defined under the Companies Act, 2013).
6. A register is to be maintained for recording all the code modifications with details like error client code, correct code, scrip name, quantity, client name, the name of the terminal ID where the order is punched, the explanation of the Dealer/Branch Manager, the 'analysis / study' of the Compliance Officer / Top Management for modification.
7. Training program should be conducted to all the Dealers and they should be explained how code modifications can be misused and what steps should be taken to avoid the same. It also should be explained that code modifications should not be encouraged to the clients except for cases like 'punching errors'/'typing errors'.

8. Periodic review and Acceptance

Policy on Error / Client Code Modification has duly placed and duly approved by the board of directors of the Company, further board has decided to have a periodic review of the same or as and when feel necessary as per the guideline issued by regulatory bodies from time to time.