Policy for Client Code Modification

(Applicable to All Exchanges/Segments)

1. Background

KJMC Capital Market Services Limited is registered with the Securities and Exchange Board of India (SEBI) as:

a. Stock Broker (SEBI Registration Number INZ000221631)
b. Depository Participant (SEBI Registration Number IN-DP-462-2008)
   The Policy has been issued in compliance with the requirement of :

1. SEBI Circular Ref : CIR/DNPD/6/2011 dated 05-Jul-2011
2. SEBI Circular Ref : CIR/MRD/DP/29/2014 dated 21-Oct-2014
3. SEBI Circular No. SEBI /HO/CDMRD/DMP/CIR/P/2016/43 29.03.2016
4. BSE Notice No. 20110826-4 dated 26-Aug-2011
5. NSE Circular Ref. No. NSE/INVG/2011/670 dated 26-Aug-2011
6. Other Circular issued by NSE,BSE,MCX and MSEI

- All orders will be placed in the trading system in the Unique Client code of the client.

- We do not make any client code changes in the back office system.

- The code changes are made only for correcting the mistakes by the Dealers if it is learned well within time limit permitted by the Exchange.

- As soon as the code changes request is received, It is checked & verified who has committed mistake and brought to the notice of the management and after obtaining approval verbally the code changes are carried out. We would constitute genuine errors with regard to client code modifications if

    o Error 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.

    o Modification within relatives ('Relative' for this purpose would mean "Relative" as defined under the Companies Act, 1956).

- Code changes module is not used any purpose other than this.

- We disclose the client codes which are classified as 'Error Accounts' to the Exchange at the time of UCC upload

- We periodically review the trades flowing to the 'Error Account.

- Transactions not accepted by clients due to wrong scrip, rate mismatch, buy instead of sell or vice versa are transferred to "Error" account and the second leg of the transaction is done in "Error" account to square of the position.

- We keep record of code changes and mistakes made by repetitive terminal operator to ensure such mistakes are minimized.

- The Penalties, if any charged by the Exchange/any regulatory authorities shall be passed on to the concerned client/Authorized Person/Dealer if the reason of the error is attributable to any negligence on their part else shall be borne by KJMC Capital Market Services Limited.

7. Wherever applicable, waiver for penalty shall be requested as per SEBI Circular Ref : CIR/MRD/DP/29/2014 dated 21-Oct-2014

Sd/-

Rajnesh Jain - Director

Director DIN 00151988

KJMC Capital Market Services Limited

The above revised policy was approved by KJMC Capital Market Services Limited at the Board meeting held on 06-Nov-2023. The Policy will be reviewed on Annual basis