

Policy for Client Code Modification.

Stock Exchanges provide a facility to modify client code after the trade has been executed to rectify any error or wrong data entry at the time of punching orders. However, such Client Code Modification is subject to certain guidelines issued by SEBI and the Stock Exchanges in this regard.

“Error Trades” means the trades which will be modified / to be modified / allowed, to be modified subject to guidelines of the SEBI / Stock Exchanges and this policy. The Exchange has provided the facility of client code modification only with a view to rectify genuine errors.

The facility is mainly to provide a system for modification of client codes in case of genuine errors in punching / placing the orders. It is to be used as an exception and not a routine. To prevent misuse of the facility Stock Exchanges levy penalty / fine for all non-institutional client code modifications.

This policy is applicable to all Client Code Modifications carried out / to be carried out in any of the client accounts, subject to guidelines issued by the SEBI / Stock Exchanges from time to time, in any segment of any exchange of which the company is a Member.

The following client code modifications would be considered as genuine modifications, provided there is no consistent pattern in such modifications:

- a. Where original client code/name and modified client code/name are similar to each other but such modifications are not repetitive.
- b. Where original client code and modified client code belong to a family. (Family for this purpose means spouse, dependent parents, dependent children and HUF)

However, there may also be a need to resort to client code modification in following situations:

- a. 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.
- b. Trade entered for wrong client due to any miscommunication from the client/ authorized representative of the client.

The facility for Client Code Modification can be used only in case of Error Trade and the Client Code Modification shall be carried out only after obtaining approval of any of the Designated Directors of the Company and in their absence that of Compliance Officer subject to the process as may be prescribed by SEBI / Stock Exchange.

However, it needs to be reiterated that in all cases adequate precautions need to be taken while placing/executing orders so as to minimize the need for resorting to client code modification.

The penalty or fine, if any, levied on the Company for any wrong trade due to any miscommunication from the client / authorized representative of the client shall be borne by the client.

For Stratagem Stock Broker (P) Ltd.

Compliance Officer