

# VT CAPITAL MARKET PRIVATE LIMITED

Registered Office: 27AB Royd Street, Ground Floor, Kolkata-700016  
Member-NSE-14759, BSE-4020 & MCX-35970 SEBI Reg no: INZ000168637

## Policy on Client Code Modifications

(Applicable for all Exchanges/Segments)

1. The modification to the client code is to be done only in exceptional cases and it should not be followed as a routine.
2. The reason for modification has to be ascertained and analyzed and genuineness is to be established and also, it's impact on the clients should be studied before the modification.
3. Normally as a principle, other than for punching errors, no modification to the client codes be allowed.
4. Therefore, it is imperative that the issue should be reported to the senior level Manager/Director and only with his approval, the modification should be carried after being satisfied that it is genuine, the same is required to be done to protect the interests of the client.
5. Hence the facility to modify the client codes should be available only at the Corporate Manager level and should not be given to the branches/franchise/sub-brokers/authorized persons.
6. Training program should be conducted for 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 genuine cases like 'punching errors'/'typing errors'.
7. A register is to be maintained for recording all the code modifications with details like error code, correct code, scrip name quantity, client name, the name of the dealer who punched the code, the explanation of the dealer/Branch Manager, the 'analysis /study' of the Compliance officer and his approval/disapproval for modification.
8. Finally, the decision of the Compliance Officer should be ratified later by the Director.

