



GANPATI FINSEC PRIVATE LIMITED

37 K BLOCK, SRIGANGANAGAR (RAJ.) 335001

Member- BSE, NSE Capital, F&O, Currency, Debt & MFSS

Phone-2483029-30 email-info@ganpationline.com, Web-www.ganpationline.com

Guidelines w.r.t. Post-trade Client Code Modifications in NSE / BSE / MCX/NCDEX

Policy created by:	Operational/Risk Management Staff
Policy reviewed by:	Compliance Officer
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Officer responsible for implementation:	Compliance Officer

The following guidelines pertaining to “Post-trade Client Code Modifications in NSE / BSE / MCX-SX/MCX/NCDEX have been adopted by Board of Directors of the Company in their meeting dated 1st September, 2011

The Company shall not carry out any Post-trade Client Code Modification in its Back-Office Software. Further, the guidelines with regard to online Client Codes Modifications shall be as under:

The client code modification facility shall be provided to the Corporate Manager only. Further, the facility extended by NSE / BSE / MCX-SX for the purpose of Post-trade Client Code Modifications shall be used in following cases only:

- ✓ 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; and
- ✓ Modification within relatives (‘Relative’ for this purpose would mean “Relative” as defined under the Companies Act, 1956). A list of such relatives is given hereinafter for ready reference of the respective users.

In all such cases where client code modifications is necessiated due to any of the reasons mentioned herein above, the wrongly punched client code shall be modified to client code “Error” which has already been uploaded in UCC as designated Error Code. It shall be ensured that the positions arising out of trades

in said "Error" account are subsequently liquidated/closed out in the market and not shifted to some other client code.

In exceptional case wherein client insist for same trade and there is risk of client dispute in case wrong punched trades shifted to error code, then wrong trade should be transferred to actual client code through exchange provided facility after getting approval from senior management to avoid client dispute.

For GANPATI FINSEC PRIVATE LIMITED

Devender Mittal

Director

Annexure

List of relatives for the purpose of post-trade Client Codes Modification:

1. Father.
2. Mother (including step-mother).
3. Son (including step-son).
4. Son's wife.
5. Daughter (including step-daughter).
6. Father's father.
7. Father's mother.
8. Mother's mother.
9. Mother's father.
10. Son's son.
11. Son's Son's wife.
12. Son's daughter.
13. Son's daughter's husband.
14. Daughter's husband.
15. Daughter's son.
16. Daughter's son's wife.
17. Daughter's daughter.
18. Daughter's daughter's husband.
19. Brother (including step-brother).
20. Brother's wife.
21. Sister (including step-sister).
22. Sister's husband.