

**LPC SECURITIES PRIVATE LIMITED POLICY**  
**FOR CLIENT CODE MODIFICATION**

Background

This policy has been issued in compliance with the requirements 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. NSE Circular Ref. No. NSE/INVG/2011/670 dated 26-Aug-2011
4. Other circulars issued by NSE from time to time

Policy

1. All orders will be placed in the trading system in the Unique Client Code of the client
2. Only genuine punching errors in client codes while placing orders shall be allowed to be modified.
3. While carrying out code modification, genuineness of the punching errors shall be verified against corroborative circumstantial evidences like similarities of codes/ names, trades in immediately preceding codes, square off trades without holdings or position or any such other evidences.
4. Client code modification shall be carried out only after prior permission from one of the Directors
5. All such Genuine Error code modification shall be carried out through UCC registered 'ERROR' account. Any rate difference including transactions costs shall be accounted for. Due reason will be recorded in the exchange system appropriately.
6. In case of any code changes directly from client code to client code bypassing the ERROR code, the same shall be informed to the exchange with the appropriate reason code, being
  - a. Error due to miscommunication – similar codes/ similar name
  - b. Transfer between relatives
7. The Penalties, if any charged by the Exchange/any regulatory authorities shall be passed on to the concerned client/Authorised Person if the reason of the error is attributable to any negligence on their part else shall be borne by LPC Securities Private Limited
8. Wherever applicable, waiver for penalty shall be requested as per SEBI Circular ref. CIR/MRD/DP/29/2014 dated 21-Oct-2014

Sd/-

Jogesh Lalkumar Chheda  
Director