

Client code modification Policy

With respect to the new SEBI directive on 'UCC changes and its implications'. The following is the modification policy of **Jamnadas Virji Shares & Stock Brokers Pvt Ltd.**

- All terminal ID's of BSE except Terminal no 1
- For NSE-CM segment, the modification, if any, can be done through the **NSE's NCMS platform**, the access of which is with the Compliance officer. For NSE-F&O segment, the modification, if any, can be done through the Corporate ID which is accessible by the Director's only.
- No back-office UCC modification is allowed.
- In case of any genuine punching errors during trading session, the same would be transferred to the "ERROR" code. For that the particular ID would be activated **for modification only** through ADMIN terminal. In case of BSE, the reason for change, **if any**, would be submitted at the end of the day through BEFS site provided by exchange.
- 'ERROR' code would be created & uploaded in UCC site of BSE / NSE/ MCX-SX, which will incorporate details of the trading member including PAN number. The wrong code trades can be transferred to the ERROR code and further transferred to the correct code thereby squaring up the transaction in ERROR code. By doing so, we can avoid penalty, provided the ERROR code is squared up the same day. The difference would be borne by the wrongdoer.
- Institutional to Institutional trades can be modified without attracting penalty.

We can change code only in case of following.

- Communication Error and/or
- Punching Error and/or
- Typing error (similar client code/name)
- We can change code between relatives. Relative as defined under sec. 6 the Companies Act, 1956.

Even though we can change code, a penalty of 1% or 2% of trade value depending on quantum of changes for the day will be levied.

The Compliance officer keeps a track of the ERROR code modification on a daily basis.

Policy on Circulation of Unauthenticated News
Prohibition on circulation of unauthenticated News:
To Protect Investors from Unauthenticated News Circulation
by the Company's Employees / Temporary Staff or other
dealing person and by company Infrastructure.

As per code of conduct for Stock Broker in SEBI (Stock Brokers and Sub-brokers) Regulations, 1992 and SEBI circular Cir/ISD/1/2011 dated March 23, 2011, all SEBI registered market intermediaries are required to have proper internal code of conduct to govern the conduct of its Employees.

In view of same, **Jamnadas Virji Shares & Stock Brokers Pvt Ltd.** Implements the code of conduct for communicating through various modes of communication. Company Directors / Officers / Employees/ Temporary Staff / Voluntary Workers are prohibited from:

1. Circulation of unauthenticated news related to various Scrips in blogs / chat forums / e-mail etc.
2. Encouraging or circulating rumors or unverified information obtained from client, industry, any trade or any other sources without verification.
3. Either forwarding any market related news received in their official mail / personal mail / blog or in any other manner except after the same has been seen and approved by the Compliance Officer.
4. Our Company Directors / Officers / Employees/ Temporary Staff /Voluntary Workers are restricted from circulation of rumors or unverified information obtained from client, industry, any trade or other sources without verification.
5. The Company Directors / Officers / Employees / Temporary Staff / Voluntary Workers will have to seek prior approval from Compliance Officer of **Jamnadas Virji Shares & Stock Brokers Pvt Ltd.** before forwarding any market related news received by them either in their official mail / personal mail / blog or in any other manner and all the reporting with regard to violation of the same shall be done to the designated Compliance Officer.
6. If an employee fails to do so, he / she shall be deemed to have violated the various provisions contained in SEBI Act / Rules / Regulations etc. and shall be liable for disciplinary action.
7. Access to Blogs / chat forums / messenger sites etc. has been restricted by Jamnadas Virji Shares & Stock Brokers Pvt Ltd. & is not allowed.

This code of conduct can be modified /amended / altered as required from time to time in compliance of the relevant provisions / regulations in this regard.