GPSK Capital Private Limited

POLICY ON CLIENT CODE MODIFICATION

Circular: - Ref.

Policy created by	**Compliance Team**
Policy reviewed by	**Compliance Officer**
Policy reviewed on	**January 3, 2025**
Policy Approved by	**Board of Directors**
Policy approved on	**January 10, 2025**

Version – 1.0

GPSK Capital Private Limited
CIN : U70101WB1988PTC045839
15A Hemanta Basu Sarani, 4th Floor, Kolkata - 700 001, India
Registered Office : 15, India Exchange Place, Kolkata - 700001
t +91 33 40215670, f +91 33 40215689, admin@gpsk.in
Members : National Stock Exchange of India Ltd (08065)
BSE Limited (6367) SEBI Registration (INZ 000219831)

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Objective

To frame the guidelines for rare / exceptional modification to client codes post trade execution and reporting of such Client Code Modifications.

Brief about Client Code Modification

Client Code Modification means modification / change of the client codes after execution of trades in rare or exceptional cases. Stock Exchanges provide a facility to modify any client code after the trade has been executed to rectify any error or wrong data entry done by the dealers at the time of punching orders. However, such Client Code modification is subject to certain guidelines as to the time limit within which the client code modification is to be carried out, terminal / system on which such modifications can be done etc. The facility is mainly to provide a system for modification of client codes in case genuine errors in punching / placing the orders. It is to be used as an exception and not as a routine process. To prevent misuse of the facility Stock Exchanges levy penalty / fine for all non-institutional client code modification.

Scope of the Policy

This policy covers all the Client Code Modifications carried out / to be carried out in any of the client accounts, subject to the guidelines issued by the SEBI / Stock Exchanges from time to time, in any segment of any exchange for which GPSK Capital Pvt Ltd. is a member.

"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. For the purpose of this Policy, only the following types of trades shall be modified / allowed to be modified, genuineness or error if the pre-condition of error modification:

- 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.
- Modification within relatives ('Relative' for this purpose would mean "Relative" as defined under the Companies Act, 1956) iii. 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.
- Trade entered for wrong client due to any miscommunication from the client.
- Modification within family members.
- Institutional trades modified to broker error account.

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General Conditions

- The facility for Client Code Modification can be used only in case of Error Trade.
- The Client Code Modification shall be carried out only on the designated system and / or as per the process as may be prescribed by SEBI / Stock Exchange and this policy.
- The client code modification shall be carried out after due approval from compliance / senior management i.e. the modification needs to be done by Risk Team only after due approval by Compliance head / Dealing Head or Organization Head.

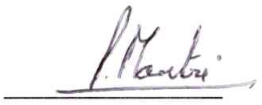
Internal Control

No client code modification shall be done save and except in unavoidable, rare or exceptional cases, without first informing the CEO or the Business Head and the Senior Sales Traders, Compliance Officer and Head of Back office.

Surveillance

A record for client code modification cases will be maintained on every financial year basis.

For M/s. GPSK Capital Private Limited,



Designated Director/Compliance Officer

Dated: - January 10, 2025

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