



BCB BROKERAGE PRIVATE LIMITED
POLICY FOR CLIENT CODE MODIFICATION
(Applicable for all exchanges/segment)

Version 5.0

Background

BCB Brokerage Private Limited is a member of BSE and NSE (SEBI Registration Number INZ000200633). This policy has been issued for modification of client codes of institutional and non-institutional trades, in compliance with the requirements of:

1. SEBI Circular ref. CIR/DNPD/6/2011 dated 05-Jul-2011 and CIR/MRD/DP/29/2014 dated 21-Oct-2014
2. Various notices/circulars issued by BSE and NSE from time to time

Policy

1. Client code modification shall be carried out only after prior permission from one of the Directors
2. **Genuine error criteria for Non-institutional Trades**
 - i. 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
 - ii. Modification within relatives as defined u/s 2(77) of the Companies Act, 2013
3. **Genuine error criteria for Institutional Trades**
 - i. Error due to communication or Punching/typing Error such that the original client code/name and the modified client code/name are similar to each other.
 - ii. Allocation to related FPIs
4. Proprietary trades shall not be allowed to be modified as client trade and vice versa.
5. Modification reasons shall be reported to exchanges within the stipulated time
6. 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 BCB Brokerage Private Limited
7. 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.
8. 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



9. Wherever applicable, waiver for penalty shall be requested as per SEBI Circular ref. CIR/MRD/DP/29/2014 dated 21-Oct-2014
10. All orders will be placed in the trading system in the Unique Client Code of the client
11. Only genuine punching errors/typing errors in client codes while placing orders shall be allowed to be modified.
12. 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.

The above revised policy was approved by BCB Brokerage Private Limited at the Board meeting held on 1st September, 2022

The policy was last reviewed on 1st July, 2024 without any changes.

For BCB Brokerage Private Limited

Sd/-
Uttam B. Bagri
Director
DIN 01379841