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POLICY ON CLIENT CODE MODIFICATIONS

1. The modification to the client code is to be done only in exceptional cases and not as a routine one.
2. The reason for modification has to be ascertained and analysed and genuineness is to be established and also its impact on the clients should be studied before the modification.
3. Normally as a principle, other than for punching errors, no modification to the client codes is allowed. The trade modification policy in the aforesaid exceptional cases is centralised. No transfers shall be made from the Error code to the Client Code. Steps shall be taken to ensure that the same is also not altered in the back office except by such person duly authorised by the Board of Directors.
4. Therefore it is imperative that the issue should be reported to the senior level Manager/Director and only with his approval, the modification should be carried after being satisfied that it is genuine, the same is required to be done to protect the interests of the client. In NSL, the Compliance Officer is empowered to do such transfers only after the clearance by the Directors.
5. Hence the facility to modify the client codes should be available only at the Corporate Manager level and should not be given to the branches/franchise/sub-brokers.
6. Training program should be conducted to all the Dealers and they should be explained how code modifications can be misused and what steps should be taken to avoid the same. It also should be explained that code modifications should not be encouraged to the clients except for cases like 'punching errors'/'typing errors'.
7. A register is to be maintained for recording all the code modifications with details like error code, correct code, scrip name quantity, client name, the name of the dealer who punched the code, the explanation of the dealer/Branch Manager, the 'analysis /study' of the authorized Manager and his Approval / disapproval for modification.
8. Client Code Modification will be reviewed by the Directors to ensure that the Company is diligently following and adhering to the policy as and when the need arise.

For Nakamichi Securities Limited

Snigdha Tibrewala

Snigdha Tibrewala
Director
DIN - 02801711