

# CLIENT CODE MODIFICATON POLICY



## **Introduction**

Fortune Interfinance Limited was founded in the year 1994 is a SEBI registered stock broker of National Stock Exchange of India Ltd. (NSEIL) and BSE Ltd. Our commitment to transparency, mutual trust, and top-notch services has fostered strong and lasting relationships with our clients. Today, we are a highly diversified group, offering a wide range of financial products and services to cater to various needs of our clients. Under the expert guidance of Mr. Rajendra Kumar Agarwal, one of our founding members with over 25 years of experience, we continue to grow, driven by our dedication and integrity in pursuing our long-term goals.

## **Risk Management policy/Internal control policy with respect to online client code modifications.:**

The following procedures are adopted for online client code modification:

1. As soon as, such trades are entered/ come into knowledge while cross checking, reconciliation, confirmation etc. by dealer, they shall be brought into notice of Compliance Officer that wrong trade has been executed.
2. Such trades shall be confirmed telephonically and then under the supervision of compliance officer, the modifications are done.
3. After modification, the same shall be confirmed to respective clients and confirmed.
4. The trade modifications shall be done only for genuine reasons. (Wrong punching of Codes or quantity).
5. Client codes which are classified as 'Error Accounts' would be disclose, as and when required to the Exchange at the time of UCC upload.

The Exchange has provided the facility of client code modification only to rectify genuine errors. Further, as per point 2 (a) and 3 (B) of the SEBI circular dated July 5, 2011, the following client code modifications would be considered as genuine modifications provided there is no consistent pattern in such modifications:

- i. Where original client code/name and modified client code/name are similar to each other but such modifications are not repetitive.
- ii. Modification within relatives ('Relative' for this purpose would mean "Relative" as defined under the Companies Act, 1956).
- iii. Error due to communication and/or punching or typing such that the original client



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code/name and the modified client code/name are similar to each other.

## **Personnel Authorized for online modifications?**

Under instructions of Compliance Office **Mr. Sushil Sanganeria** orders are to be modified.

## **In case the same is at Branch level, what is the mechanism to communicate the same to HO?**

All Modifications shall be done at HO only.

## **Is there any process by which compliance officer is being appraised with all such client code modifications?**

All instructions shall be issued by our Compliance Officer only and trade modification is done under his direct supervision.

## **In case of high value client code modification any escalation mechanism in place?**

All modifications are to done under instruction of Compliance officer hence there is no need for escalation mechanism.

## **Any system of monitoring such online transfer of trades?**

It shall be done under active supervision of Compliance Officer.

## **Steps to be followed to ascertain genuineness of such online client code modifications?**

The trades shall be brought into knowledge of Compliance officer and they shall be modified under his direct supervision of compliance officer after his satisfaction and confirmation.

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there is no consistent pattern in such modifications:

1. Where original client code/name and modified client code/name are similar to each other but such modifications are not repetitive.
2. Modification within relatives ('Relative' for this purpose would mean "Relative" as defined under the Companies Act, 1956).
3. 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.

## **Documents to be collected for ascertaining genuineness of such client code modifications?**

The effecting parties shall be informed telephonically and after their confirmation to compliance officer, the modification shall be executed. A list of relative shall be obtained

## **Procedure of intimation to clients & obtaining confirmations from them?**

Whenever applicable information shall be given to client telephonically or in writing.

**Change in the Policy will be adopted as and when required by the company and is binding on all the Staff/Employees/and Directors of the Company.**

**For Fortune Interfinance Limited**



**Designated Director**

**Date: - 20<sup>TH</sup> MARCH, 2023**