# SAROJ SECURITIES

309  KAN CHAMBER, 14/113 CIVIL LINES, KANPUR – 208 001

Member: The National Stock Exchange of India Ltd.

SEBI Regn No: INZ 000224427

## Policy for transfer of trades

1. With reference to the SEBI circular ref no CIR/DNPD/6/2011 dated July 5 , 2011 regarding modification of the Client codes of Non institutional trades , the following client code modifications would be considered as genuine modifications  ,provided there is no consistent pattern in such modifications. And transfer of trades would be allowed for such cases only after submitting the transfer request to Exchange and obtaining necessary approval .

   i.     Error due to communication and/or punching or typing such that the original  client code /name and modified client code /name are similar to each other but such modifications are not repetitive.

   ii.    Modifications within relatives (Relative for this purpose would mean **Relative** as defined under the Companies Act ,1956 )

2. It shall be the duty of Compliance Officer / any other senior member of the management to check that the error is genuine and is non repetitive . The management of the member would be at liberty to refuse for transfer of trade , if it appears that the transfer is carried with an intention of malpractice .

3. .In case of trading in wrong client code in Capital Market Segment , ensure that the error is humanly and Client code change is not carried for malpractice , ratify it with the correct client code through NCMS or transfer it to error code of Saroj Securities ,as the case may be , get it documented in Client Code Change Register and ensure to ratify it with the correct client code in the back office.

4.  In case of trading in wrong client code in F & O/Currency Derivative Segment , ratify it with the correct client code online or transfer it to error code of Saroj Securities ,as the case may be before cut off time of NSEIL and get it documented in Client Code Change Register .

5. Such trades will be transfer to correct client code in Back-office after reporting the same to Exchange and receiving confirmation from exchange .

6.Any modification in Client codes shall attract monetary penalty as per SEBI/NSE rules applicable at relevant time , and would be payable by the Clients responsible for error.

## Updated on 01.04.2021