

SW CAPITAL PRIVATE LIMITED

4th Floor, Sunteck Centre, 37-40, Subhash Road, Vile Parle (E), Mumbai-400057, India.
Tel.: (91-22) 42687474, Fax : (91-22)42687436

Policy on Client Code Modifications:

- The modification to the client code is to be done only in exceptional cases and not as a routine one.
- The reason for modification has to be ascertained and analysed and genuineness is to be established and also it's impact on the clients should be studied before the modification. If voice recording is in practice, the same should be studied.
- Normally as a principle, other than for punching errors, no modification to the client codes be allowed.
- 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.
- 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.
- 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'/'communication errors'.
- 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 authorised Manager and his approval/disapproval for modification.

Member: NSE, BSE, MCX-SX, USE and CDSL
E-mail: contact@swcapital.in Web: www.swcapital.in

- Finally the decision of the authorised Manager should be ratified later by the Director.
- If during verification, it is found that there is ambiguity for ownership of the trade, then the trade shall be transferred to **ERROR Account** to avoid any consequences in future.
- The trades transferred in ERROR Account, shall be settled in ERROR Account only and the gain or loss arise from such settlement shall be borne by the member.
- Then, we will issue contract note to our clients accordingly.
- If after receipt of contract note, client has any grievance with respect to trade executed in his account. He may e-mail us on our investor's grievance e-mail id, or he may call us which would be reduced to writing in our complaint book.
- After receipt of client complaint, we do verification of the complaint.
- We investigate the matter in our records and verify it from our Dealer/Branch Head.
- After that we would take necessary action in corrective manner and we would keep informed to our valuable client.

**Thanking You,
For SW Capital Private Limited**

**Sd/-
Director**