AAA INSTITUTIONAL SECURITIES PVT LTD

Space On B-16-A, Plot No-5, Community Centre, New Friends Colony, New Delhi - 110065 | Tel. No.: +91-11-45511315 | Mob. No. +91-96677 38861

Email: info@aaa-securities.com | Website: www.aaa-securities.com

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POLICY ON CLIENT CODE MODIFICATION

1. INTRODUCTION

Client Code Modification means modification of the client code after execution of a trade. The Stock Exchanges provide a facility for modification of client codes for the purpose of rectification of genuine errors, subject to the applicable guidelines, circulars and directions issued by SEBI and the concerned Stock Exchange(s), as amended from time to time.

Client Code Modification shall be undertaken **only in exceptional circumstances and not as a routine practice**. Any modification shall be carried out strictly within the timelines, conditions and procedures prescribed by the Stock Exchange(s) and SEBI.

Genuine errors identified by the Company shall be appropriately rectified and, wherever applicable, the resultant position may be transferred to the designated **Error Account**, subject to the applicable regulatory requirements.

2. GENUINE ERRORS

The following shall constitute genuine errors for the purpose of Client Code Modification, subject to the applicable SEBI and Stock Exchange guidelines:

(A) Communication, Punching or Typing Error

An error arising due to incorrect communication, punching or typing, where the original client code/name and the modified client code/name are similar to each other and the modification is undertaken solely for rectification of such genuine error.

(B) Modification within Relatives

Modification of a trade between relatives, wherever permitted under the applicable regulatory framework.

For this purpose, the term **"Relatives"** shall have the meaning assigned to it under the **Companies Act, 2013**, as amended from time to time.

3. ERROR ACCOUNT

The shifting of any trade, whether institutional or non-institutional, to the designated **Error Account** shall not be treated as Client Code Modification to the extent permitted under the applicable SEBI and Stock Exchange requirements, including the applicable provisions relating to erroneous trades.

The Company shall ensure that positions arising out of trades transferred to the Error Account are subsequently **liquidated/closed out in the market** and are not transferred to another client code, except where specifically permitted under applicable regulatory requirements.

The Client Code designated as the **"Error Account"** shall be disclosed to the Stock Exchange at the time of uploading the Unique Client Code (UCC), wherever required.

4. ERROR POLICY AND INTERNAL CONTROLS

The Company shall maintain a well-documented process for handling Client Code Modifications and erroneous trades. Such process shall be approved by the appropriate authority of the Company and shall be implemented in accordance with the applicable SEBI and Stock Exchange requirements.

The following internal controls shall be maintained:

- Client code mapping on trading terminals shall be appropriately restricted to minimise the possibility of punching errors.
- A separate **Error Account** shall be maintained in the name of **AAA Institutional Securities Private Limited**, or such other nomenclature as may be prescribed or permitted by the concerned Stock Exchange.
- A **Client Code Modification Register** shall be maintained for recording details of all Client Code Modifications/errors.
- The list of inactive clients shall be periodically reviewed and appropriate updates shall be made in the **CTCL/Surveillance System**, wherever applicable.

5. BOARD AND MANAGEMENT DIRECTIVES

The Board of Directors and Management of the Company shall ensure strict adherence to this Policy by all concerned officers, employees, dealers and other personnel.

5.1 Dealer Responsibility

Dealers shall exercise due care while receiving client orders. Before placing an order in the trading system, the dealer shall, to the best of his/her ability:

- carefully listen to and confirm the client code;
- confirm the scrip/security name; and
- reconfirm the **relevant** order details wherever necessary.

Dealers shall exercise reasonable care to minimise errors arising from incorrect communication, punching or typing.

5.2 Department Head Responsibility

The concerned Department Head shall analyse the circumstances and causes of any error and shall take or implement appropriate corrective and preventive measures to minimise recurrence.

The Department Head shall also periodically report to the Board/Management regarding the implementation and effectiveness of this Policy and any material or recurring instances of Client Code Modification.

6. REPORTING AND APPROVAL SYSTEM

1. Any request for Client Code Modification shall be reported to the designated **Key Personnel/authorised person** and shall be undertaken only after obtaining the requisite approval and confirming that the proposed modification constitutes a genuine error in accordance with the applicable SEBI and Stock Exchange requirements.

2. Client Code Modification shall be processed through the **Head Office** of the Company or such other location/function as may be authorised by the Company.

3. The Company shall review the **Error Account file/report received from the Stock Exchange on a daily basis**, wherever such file/report is made available by the Exchange.

4. All Client Code Modifications shall be appropriately recorded in the Client Code Modification Register and supported by the relevant details and approval.

7. COMPLIANCE WITH REGULATORY REQUIREMENTS

All Client Code Modifications shall be carried out strictly in accordance with the applicable provisions of SEBI, the recognised Stock Exchange(s), Clearing Corporation(s) and other applicable regulatory authorities.

In the event of any amendment, clarification or replacement of the applicable regulatory requirements, the Company shall comply with the revised requirements from the applicable effective date.

8. POLICY REVIEW

This Policy shall be reviewed periodically and whenever there is any material change in the applicable SEBI/Stock Exchange requirements or the Company's operational processes.

The Compliance Officer shall be responsible for monitoring the implementation of this Policy and recommending appropriate amendments to the Management/Board, wherever required.

9. POLICY APPROVAL

This **Policy on Client Code Modification** was approved by the Board of Directors of **AAA Institutional Securities Private Limited** at its meeting held on **24th July 2026**.