



POLICY ON CLIENT CODE MODIFICATION

1. BACKGROUND

As per the requirements of NSE, BSE and SEBI, the Company has designed a policy for Client Code Modification on the terminals for the Capital and Futures and Options Segment and Currency Derivatives Segment. To frame the guidelines for modification to client codes post trade execution and reporting of such Client Code Modifications.

2. BRIEF ABOUT CLIENT CODE MODIFICATION:

Client Code Modification means modification / change of the client codes after execution of trades. Stock Exchanges provide a facility to modify any client code after the trade has been executed to rectify any error or wrong data entry done by the dealers at the time of punching orders. However, such Client Code modification is subject to certain guidelines as to the time limit within which the client code modification is to be carried out, terminal / system on which such modifications can be done etc. The facility is mainly to provide a system for modification of client codes in case genuine errors in punching / placing the orders. It is to be used as an exception and not a routine. To prevent misuse of the facility Stock Exchanges levy penalty / fine for all non-institutional client code modifications.

3. SCOPE OF THE POLICY:

This policy covers all the Client Code Modifications carried out / to be carried out in any of the client accounts controlled by HO, subject to the guidelines issued by the SEBI / Stock Exchanges from time to time, in any segment of any exchange for which MSFL is a member broker.

4. "ERROR TRADES" means the trades which will be modified / to be modified / allowed, to be modified subject to guidelines of the SEBI / Stock Exchanges and this policy. For the purpose of this Policy, only the following types of trades shall be modified / allowed to be modified:

- i. Client code/name and modified client code/name are similar to each other but such modifications are not repetitive.
- ii. Family Code (spouse, dependent parents, dependent children and HUF)



***Rosy Blue Securities
Private Limited***

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- iii. Punching error / typing error of client codes due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
- iv. Trade entered for wrong client due to any miscommunication from the client / authorized representative of the client.
- v. Modification within family members
- vi. Institutional trades modified to respective scheme accounts of the funds.
- vii. NOTE - No consistent pattern in such modifications:

5. GENERAL CONDITIONS :

- a. The facility for Client Code Modification can be used only in case of Error Trade.
- b. The Client Code Modification shall be carried out only on the designated system and / or as per the process as may be prescribed by SEBI / Stock Exchange.

6. PENALTY

The penalty or fine, if any, levied on Rosy Blue Securities Pvt. Ltd. for any wrong trade occurred due to any miscommunication from the client / authorized representative of the client shall be borne by the client.

For Rosy Blue Securities Pvt. Ltd.

SD/-

**Shilpa Hirani
Director**



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CERTIFIED TRUE COPY OF THE RESOLUTION PASSED IN THE MEETING OF DIRECTORS OF ROSY BLUE SECURITIES PVT. LTD. HELD ON 1st OCTOBER, 2011 AT 154/C MITTAL COURT, NARIMAN POINT, MUMBAI - 400 021 AT THE REGISTERED OFFICE OF THE COMPANY.

TO APPROVE THE POLICY ON MODIFICATION OF CLIENT CODE

The Chairman informed the Board that SEBI has through the stock exchanges informed that the company has a policy for Modification of Client Codes for the trades executed on the exchange platform. Copy of the circular is tabled and initialled by the chairman for identification purposes.

A draft policy for the same has been formalised and the same is also tabled for the approval of the board and has been initialled by the chairman for identification.

“RESOLVED THAT the draft policy on the Modification of client code be and is hereby approved”

Certified True Copy

For Rosy Blue Securities Pvt. Ltd.

SD/-

**Shilpa Hirani
Director**