



Client Code Modification Policy

Entity Name	Manog Securities Pvt Ltd
SEBI Registration No.	INZ000278434
Compliance Officer	Pawan Pratap Singh
Date of Adoption	28-JAN-2026

1. Regulatory Basis

- SEBI Master Circular SEBI/HO/MIRSD/MIRSD-PoD/P/CIR/2025/90 dated June 17, 2025 — para 38
- NSE Circular No. 61813 dated April 29, 2024
- Companies Act 2013 — Section 2(77) defines 'Relative' for permissible modifications

2. Genuine Error — Definition

Client code modification is permitted ONLY for genuine errors:

- Error due to communication and/or punching / typing such that original and modified client code/name are similar to each other
- Modification within relatives — 'Relative' means as defined under **Section 2(77) of the Companies Act, 2013**
- INSTITUTIONAL CLIENTS: Client code modification for institutional clients (FII's, FPIs, Mutual Funds, Insurance Companies, Banks) is **STRICTLY PROHIBITED**. Any such request must be immediately reported to the Compliance Officer.

3. Approval Process — Written Approval Mandatory

- Dealer identifies error and submits written request (email) to Compliance Officer immediately
- Request must include: original code, modified code, trade details, reason, dealer name
- Compliance Officer provides **written email approval** before modification is executed — verbal approval is not valid
- Modification executed within Exchange-prescribed time limit
- Client notified by SMS and email within 24 hours
- Entry made in Code Modification Register (Section 5)

4. Operator Training and Warning Protocol

- 3 or more errors in a calendar quarter: **formal written warning** from Compliance Officer
- 5 or more errors in a calendar quarter: **single-dealer order authority suspended for 30 days** — dual confirmation required for all orders

5. Code Modification Register

Field	Description
Date and Time	Date and exact time of modification
Original Client Code	UCC before modification
Modified Client Code	UCC after modification
Trade Details	Exchange, segment, scrip, quantity, price, trade reference
Reason	Specific description of error (communication / punching / relative)
Operator Name	Name of dealer who made the error
Approval Reference	Compliance Officer name and email approval reference
Client Notification	Date and mode (SMS / email)

- Error Account reviewed **daily** — no trade to remain beyond the settlement cycle
- Error Account disclosed to Exchange at every UCC upload

Policy Review

Last Reviewed	11-FEB-2026
Reviewed By	Pawan Pratap Singh (Compliance Officer)
Approved By	Director

For and on behalf of: Manog Securities Pvt Ltd

Authorised Signatory	Mr. Vivek Gupta
Designation	Director
Date	11-FEB-2026
Signature	<u>For Manog Securities Pvt. Ltd.</u>



Director