



CENTILLION CAPITAL PRIVATE LIMITED

(Formerly PELF FINSTOCK LTD)
(MEMBER : NSE, BSE, DP: NSDL)
SEBI Regn. No. INZ000168834, DPID: IN 302943
CIN: U65993DL1995PTC073247

CENTILLION CAPITAL PRIVATE LIMITED

POLICY ON CLIENT CODE MODIFICATION

Client Code Modification means modification of client code after the execution of trade. The Stock Exchange provides a facility to modify the client code to rectify an error. Further the Genuine Errors will be modified and after being transferred to 'Error Account'. The Modification should be done within the Stock Exchange Guidelines. The modification of client code is to be done only in exceptional cases and not in routine cases.

1. The following constitute Genuine Errors with regard to Client Code Modification:
 - (A) Error due to communication and/ or punching or typing such that original client code/ name and the modified client code/ name are similar to each other.
 - (B) Modification within Relatives ('Relatives' for this purpose would means "Relatives" as defined under the Companies Act, 2013.)
2. Our shifting of any trade (Institutional or non institutional) to the error account is not treated as modification of client code under SEBI Circular dated July 05, 2011, provided the positions arising out of trades in error account are subsequently liquidated/ closed out in the market and not shifted to some other client code.
3. Client Code which is classified as 'Error Account' is disclosed to the Exchange at the time of UCC upload.
4. We have a well documented Error Policy to handle Client Code Modifications, which is approved by our management.

BOARD AND MANAGEMENT DIRECTIVES:

1. The Board and Management have approved under mentioned policy in this regard and instruct the entire officer bearer to follow it strictly.
 - To control the punching error, it has been decided that client code mapping will be restricted in trading terminals.
 - To create a separate error account in the name of "CENTILLION CAPITAL PRIVATE LIMITED" as per the exchange circular.
 - To maintain Client Modification Register with immediate effect for recording the errors.



- To review periodically list of inactive client for marking in CTCL Surveillance System.
- 2. Dealers are advised to hear patiently the client code/ scrip name and reconfirm the same to their best possible efforts before placing order into the system.
- 3. Department Head are advised to analyse the mistake and to take/ implement corrective measures to their best possible efforts to minimize.
- 4. Department Head are advised to update the report to the Board/ Management on the implementation of the said policy periodically.

REPORTING SYSTEM:

1. Client Code Modification issue is reported to the Key Personnel's and can be done only after getting approval after knowing it's genuinely as per exchange directives.
2. Any Client Code Modification is subject to this policy being carried at Head Office of the company.
3. The company review every day the Error Account file send by the Exchange.

Policy last reviewed on March 31, 2025.

