Policy for

Client Code Modification / Error Account Policy

Objective: To frame the guidelines for modification to client codes post trade execution and reporting of such Client Code Modifications.

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.

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 New Berry Capitals Private Limited is a member broker.

"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:

In case of Exchange (NOTE: no consistent pattern in such modifications):

- client code/name and modified client code/name are similar to each other but such modifications are not repetitive.
- Family Code (spouse, dependent parents, dependent children and HUF)
- 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.
- Trade entered for wrong client due to any miscommunication from the client / authorized representative of the client.
- Modification within family members
- Institutional trades modified to broker error/pro account

General Conditions:

- The facility for Client Code Modification can be used only in case of Error Trade.
- 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.

Place for Client Code Modification: Any Client Code Modification shall, subject to compliance of this policy, be carried out at HO of all the Error Trades happened in Capital Market Segment of NSE and BSE.

Penalty: The penalty or fine, if any, levied on New Berry Capitals Private Limited for any wrong trade occurred due to any miscommunication from the client / authorized representative of the client shall be borne by the client.

Error Account Policy

1. Trades are executed in respective clients account and are not transferred from one client code to another client code or from client code to pro or vice-versa in the back office of the member.

2. Modifications of Client codes of trades on the Exchange platform, if any, are done only to rectify a genuine error in entry of client code at the time of placing/modifying the related order as per the provisions of Circular Ref. No.: NSE/INVG/2011/670, dated August 26, 2011).The following would constitute genuine errors with regard to client code modifications:

    - Error due to communication and/or punching or typing such that the original client code/name and the modified client code/name are similar to each other.

    - Modification within relatives ('Relative' for this purpose would mean "Relative" as defined under the Companies Act, 2013).

3. Shifting of any trade on account of genuine error (institutional or non-institutional) to error account are subsequently liquidated/closed out in the market and are not shifted to other client code.

4. "Error Accounts" are classified properly and UCC uploaded to Exchanges.

5. Trades transferred to 'Error Accounts' are reviewed/monitored properly to check the genuineness and to prevent the use of client code modification facility for purposes other than correcting mistakes arising out of client code order entry.

6. The trades modified by the member to the "Error Code" has been settled in Error Account.

7. This policy would be modified time to time as per circulars of SEBI/Exchanges.