EKLINGJI BROKING LLP

(**LLPIN**: ACA-2231)

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Client Code Modification Error Policy

Objective

This policy outlines procedures and penalties for modifications to client codes to minimize order entry errors and ensure compliance with NSE, BSE, MCX and NCDEX guidelines.

Applicability

Applicable to all segments traded by the Eklingji Broking LLP.

Penalty Framework

Non-institutional Client Modifications:

- Modifications involving non-institutional clients incur penalties:

Modified Trades (% of Total Turnover)	Penalty (% of Modified Trades)
≤ 5%	1%
> 5%	2%

Institutional Client Modifications:

- Modifications allowed only between different schemes/sub-accounts managed by the same institution are exempt from penalties.
- Modifications between unrelated institutional clients attract penalties as above.

Designated Error Account

- Brokerage to maintain an active designated error account with the client code nomenclature as "ERROR" or "ERROR%".
- Account name format: "TM Name - Error Account".
- Non-maintenance of a single active error account incurs a penalty of Rs.10,000 per month; further disciplinary action after three consecutive months of violation.

Error Account Liquidation

- Trades transferred to the error account must be liquidated within three working days (inclusive of trade day).
- Non-liquidation attracts penalties outlined above.

- Trading members must report liquidity issues to NSE within one trading day for resolution. Exchange's decision on liquidity is binding.

Repeated Errors and Internal Controls

- Modifications from the ERROR account to any other client account attract a 2% penalty on traded value; repeated instances invoke additional disciplinary actions.
- Brokerage firm must implement internal controls to minimize error account modifications, subject to inspection by NSE.

Reporting and Reasons for Modifications

- Mandatory reporting of modification reasons through NSE's ENIT portal under Compliance → Client Code Modification → Client Code Modification Reason.
- Accepted reasons:
    1. Communication or punching/typing error (similar client codes/names).
    2. Modifications within relatives (as defined under Companies Act, 2013).
    3. Allocation adjustments within related institutional schemes/sub-accounts.

Penalty Waiver Procedure

- Penalty waiver requests with reasons and supporting documents must be submitted within three calendar months from penalty imposition.
- Genuine errors eligible for waiver:
    1. Typing/punching errors with similar original and modified codes.
    2. Modifications between relatives as per Companies Act, 2013.

This policy is revised and approved by the Board of Partners in the meeting held on 1st September 2026 at its registered office and will be reviewed periodically for updates as per regulatory changes.

For, Eklingji Broking LLP

Partners

EKLINGJI BROKING LLP
M.R.Shah
DESIGNATED PARTNER

EKLINGJI BROKING LLP
Signature
DESIGNATED PARTNER