



**Wealthstreet**

The Financial Engineers

# Transfer of Trades

## Introduction

The transfer of trades between client accounts is a sensitive matter that requires adherence to strict protocols to ensure transparency, accuracy, and regulatory compliance. At Wealthstreet, we prioritize the integrity of client transactions and the accuracy of trade executions. As part of our commitment to maintaining high standards of professionalism and ensuring a smooth trading experience, this policy outlines the guidelines for the transfer of trades between client accounts. It is crucial that clients and dealers alike follow the outlined procedures to ensure all trades are executed with precision.

## Policy Statement

As per the Company's policy, **trade transfers between client accounts are not generally permissible.** All trades must be executed under the respective client codes, and dealers are expected to take the utmost care when executing trades to ensure the accuracy of critical trade details such as the client code, quantity, price, etc.

However, in cases where exceptional circumstances arise, such as errors caused by typographical mistakes or miscommunication, the policy allows for a detailed review process before a trade is transferred from one client account to another on the exchange platform.

## Exceptions to the Policy

In the event that a trade is captured under an incorrect client code due to typographical errors, family member codes, miscommunication, or any other reason, the following procedure will be followed:

1. **Investigation and Review:** A thorough investigation will be conducted to understand the circumstances of the error. This investigation will help determine whether the transfer is justified.
2. **Board Approval:** If the investigation concludes that the trade should be transferred, the matter will be presented to the Board for review and approval.
3. **Cross-Verification:** Both clients involved in the trade transfer—the client under whose account the trade was originally executed and the client to whom the trade is being transferred—will be contacted for verification and consent.
4. **Final Decision:** Only after thorough investigation, cross-verification, and Board approval, will the transfer be authorized.

## Wealthstreet Financial Services Private Limited

*Formerly Known as Wealthstreet Advisors Private Limited*

**CIN: U74999GJ2016PTC094432**

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### **Key Procedures for Trade Transfer**

1. **Accurate Trade Execution:** Dealers must ensure that all trades are executed accurately under the correct client code. This includes verifying the quantity, price, and other trade details.
2. **Error Identification:** In the event of a typographical error, incorrect code from the client, or any other mistake, an immediate investigation will be initiated.
3. **Investigation and Documentation:** The dealer will document all details of the error, including the nature of the mistake and its cause, and submit it for investigation.
4. **Approval Process:** After the investigation, if the issue is deemed to be an error, the transfer request will be presented to the Board for final approval.
5. **Client Consent:** Both clients involved will be contacted to confirm their consent for the trade transfer. This cross-verification ensures that both parties are in agreement with the change.

### **Board Oversight**

All cases where trade transfers are requested or come to the attention of the management will be submitted to the Board for review and approval before any action is taken. The Board will assess the circumstances surrounding the transfer request and make a final decision based on the available information.

### **Conclusion**

At Wealthstreet, we are committed to upholding the highest standards of trade integrity and transparency. While trade transfers are not generally allowed, we recognize that exceptional circumstances may arise. In such cases, we follow a structured process of investigation, cross-verification, and Board approval to ensure that any trade transfer is handled with care, accuracy, and fairness. This policy ensures that clients can trust Wealthstreet to manage their trades in a secure and professional manner, while also maintaining compliance with regulatory requirements.

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