

(Pvt) Limited

BRK # 117, TREC Holder Code 186, TREC Holder / Broker: Pakistan Stock Exchange Limited. (Formerly: Karachi Stock Exchange Limited), 1stFloor, Room no. 36, Stock Exchange Building, Stock Exchange Road, Karachi. Phone no. +9221 32421624, 32413024, 32410835, Email id: <u>tarigmoti186@gmail.com</u>.

Date: 01 JUL 2015

Policy & Procedures

Account Opening:

Principally, company management has firm policy to open accounts of new clients with full reference and after completing all KYC & YDD formalities – thus not paving no way for the incomplete information and or having any risk behind such as political person or government employee or having unknown source of income.

Company does not opening of account without a format meeting in person with the respective client – which ultimately results in full confidence on both the parts.

Further, without completing all the formalities – no account will never be opened and no staff member is allowed to open the account without having consent of the CEO and getting his signatures on the Account Opening Form.

The following documents are required for opening an account:

- Original NIC copy of the individual and any joint account holder.
- Original NIC copy of nominee mentioned in account opening form.
- Bank verification from the individual account mentioned as the operational bank for transactions.
- Zakat declaration optional
- NTN Certificate optional

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Exposure Requirement:

Executing trades on behalf of client without having proper is needless to risky for the company and thus we do not allow any client to place orders without appropriate exposure.

Indeed, our company has only delivery-based clients and thus very limited numbers of trades are executed; thus we do not face any major risk.

Further, duties have been assigned to the concerned staff to make compliance of exposure online. In addition, one of the directors makes sure to check and verify the daily reports in the regard from the back office.

Settlement:

Nevertheless, after almost all the securities eligible for CDC, settlement has become very easy. In addition, after make sure to collect the CDC D.O/T.Os in advance from the respective clients, who opt to sell their shares (standing in CDC Investor Account)

Since, the settlement of securities is done automatically in NCCPL; thus, no major work is done by our staff and they rather concentrate on collection and disbursement of funds thereof. In this regard, company keeps a vigilant eye on smooth settlement, which is mutually beneficial for the company and its clients.

Segregation of Clients' Funds and Securities:

We strongly believe that the securities and funds of the clients in our company are purely "Amanat" and thus it's the duty of our company to keep them segregated from our own business/property.

As a matter of fact, our company has a very limited business activity and thus faces no problem in segregation, which is monitored regularly and daily basis.

All the cheques to the clients and from the clients are performed through the clients account in Bank which is separate from the house account.

The house account is only used for clearing and brokerage expenses while all client related activities are done through a client account.



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Compliance of Rules & Regulations

We have firm belief that all the rules and regulation are indeed beneficial for the improvement and progress of the market and ourselves as well; thus, we concentrate in complying all the rules and regulations of the regulators including KSE & SECP.

In this regard, our compliance officer makes sure to read and keep the records of notices/circulars in this regard and after due discussions with the management, we make it sure to fully comply with.

Check and Balance & Reconciliation of Records

Management has assigned duties to the staff to keep a check and balance of all the trades/transaction on a daily basis. Further, Stock Position and Funds reconciliation report is prepared regularly, which is counter checked by one of the directors to keep all the records up to date and reconciled.

AML and KYC policy

We strongly adhere to the AML Policy regulations whereby any such activity must be reported to the exchange. A report "Gazette of Pakistan "is submitted to the NCCPL/SECP every quarter clarifying any unknown or mysterious investors.

No client is entertained without complete documents provided, plus the NCCPL verifies the NIC and provides an UIN which allows validity of clients.

KYC covers brief information of the clients and is duly filled at the time of account opening form by the compliance officer. It covers the sources of funds and information as outlined by the KSE rule book.

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Order confirmations and Order Taking

Order confirmations are provided through email at the end of the day which includes the total holding of the client plus the cash ledger i.e. the receipts and payments due or conducted at that day.

Moreover, clients are also informed of their buying/selling orders through verbal communications which is conducted by the respective Traders involved, plus the in-house clients are provided a print out of their transactions duly signed by them as confirmation of their orders.

Timely submission of Reports etc to the Regulators

Management is very serious in making the submission of all the required reports/statements to the regulators including Net Capital Balance Certificate, Annual and Bi-Annual Accounts, Segregation Reports and quarterly submission of data with SECP and makes all possible efforts to remain 100% compliant in this regard.

Availability of Reports for Clients

Indeed, making available all the concerned reports such as CDC Balance Reports, ledger reports for the clients is very essential, as it not only provide them up-to-date status; but, also make it possible for them and us to reconcile the records regularly

In the light of above, we highly emphasize to make it sure that clients are receiving their required reports regularly and upon their requirement at any time as well.

Zero Activity in Cash

Principally, we do not allow our clients to deal in cash and as such we do not accept cash receipts and simultaneously do not make payments in cash at all, which is needless to say very beneficial for the reconciliation of records and fully documented transactions always.

In some rare cases we might accept a maximum of Rs 25000 in cash which is acceptable under the rules.

Staff Recruitment

Indeed, we have highly experienced staff, which is associated with our company since very long and no change has been made in the staff of our client for the last long time, where we enjoy cordial relationship with our staff.

Complete records of salary disbursement and deduction of tax (if any) is made properly. Further, Attendance register is also maintained in our office.

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