

SEPTEMBER 15, 2021

EMPLOYEE TRADING POLICY

Approval & Amendments

	Effective Date	Description of Change
1 st	30 November, 2019	Updates in AML laws and regulations
2 nd	31 May, 2020	Updates in Laws and regulation
3 ^d	10 August, 2020	Change in Laws and regulation
Amendments		
Version	Effective Date	Description of Change
1 st	30 November, 2019	Updates in AML laws and regulations
2 nd	31 May, 2020	Updates in Laws and regulation

Purpose

Aba Ali Habib Securities (Private) Limited. "AAHS" reputation for integrity and fair dealing is one of its most valuable assets to protect that reputation, all employees must engage in personal account trading in a manner that is in compliance with applicable rules and regulations and one in which conflict of interest related to personal investment activities are avoided.

Scope

This policy applies to all of the employees of AAHS. It defines the minimum standards for employees to follow in their personal trading accounts.

Employees are required to be familiar with this Policy and any such additional requirement and to comply with them in all respects. An Employee Personal Trading Account is defined as an account that has brokerage capability. i.e. that ability to execute transaction in securities and other.

Per-Clearance of Employee Transaction

Employees must be familiar with and abide by any preclearance requirement for transaction in our Employee Personal Trading Accounts. Employees with pre-clearance requirement may not trade until receiving written permission as defined in SOPs.

Minimum Holding Periods

Employees are strictly restricted from same day Buy-Sell. Employees should hold securities for a minimum period of 3 working day.

TRADING BY EMPLOYEES OF BROKERAGE HOUSE

- 1) The employee trading will be allow only through at Aba Ali Habib Securities Private Limited.
- 2) Company shall open all their employees UIN in NCCPL database with all registration details including their respective designations and registration details. We update any change occurs within five (5) working days from the date of employment or any change in their registration details.
- 3) The company shall ensure that while trading, the concerned employee strictly observes the Code of Conduct of the company
 - i. Employees of company desirous of trading must obtain prior written authorization for such activity from the company or authorized officer of the company for trading account opening form.
 - ii. Employee must submit to the company or authorized officer of the company, a written undertaking of his understanding and willingness to strictly abide by all the relevant rules, regulations, codes and procedures as prescribed by the Exchange, Clearing

Company, Depository Company and the Commission at all times while trading on his own account.

- iii. The provisions of all PSX Regulations or any other Regulation which may be made from time to time in this regard would be applicable to such trades.
- iv. All trades on behalf of the employees concerned shall be executed against their own respective UINs and shall be subject to these Regulations.
- v. Employees must ensure that investment advice given to clients by them does not result in a conflict of interest with their individual trading activities.
- vi. The employees should not indulge in buying or selling securities of a company for their own account or any account over which they exercise control if they possess non-public information or inside information of that company or information pertaining to any potential trade/deal which may affect the share price of that company. Further, they will not pass any such information to others.
- vii. The employees should not buy or sell those securities for their own account in which they are aware of clients' proposed trades, trades by the company or forthcoming research report regarding such securities.
- viii. The company shall monitor their employees' trades regularly and the Internal Audit Department will ensure compliance of these Regulations and any violation shall be communicated to Audit Committee and Chief Executive Officer and shall be submitted to the Exchange and/or the Commission as and when demanded.
- ix. Adherence by the company as well as their employees, in letter and spirit, to this Code of Conduct is mandatory.

4) The company shall not allow trading on behalf of another Securities Broker's employees.

Prohibition on Transactions that Pose Conflicts of Interest

As an Employee of AAHS employees must pursue the best interests of AAHS and its client and not put their own trading interests ahead of clients and AAHS interests. As such, Employees must adhere to the following principles.

- Employees' transaction involving a conflict of interest between employees and AAHS are strictly prohibited.
- Employees are prohibited from using their access to AAHS proprietary accounts to advantage their personal investing
- Employees are prohibited from trading in any other brokerage house

Where this Policy precludes employees from conducting a transaction in their Employees Personal Trading Account, they are prohibited from procuring another person to make such a transaction on your behalf.

Monitoring of Employees Transaction

Employees personal Trading Accounts are subject to monitoring by Compliance and / or supervisory review.

Violation of this Policy

AAHS may, at employees' expense and without prior notice, freeze or cancel any transaction or positions resulting from transactions in violation of this Policy.

Employees, may be required to disgorge profits, if any, Employees may also be subject to disciplinary action by AAHS, including termination of employment. In the event applicable rules or regulations are violated, Employee may also be subject to regulatory sanction and civil and criminal penalties.

Undertaking

I solemnly affirm and undertake that I have read and understood the employee Trading policy of Aba Ali Habib Securities (Private) Limited. I hereby undertake to abide by all applicable rules and regulations at all time with no exceptions.

To
The Compliance Officer
Aba Ali Habib Securities Private Limited
505, Fifth Floor, Business Plaza Off SBP
I.I Chadriger Road
Karachi.

APPLICATION FOR PRE-CLEARANCE

As on date I /my immediate relative Mr./Ms. am/is holding shares in your Company, under Folio No./ DP ID - Client ID I/my immediate relative am/is desirous of trading (buying / selling / dealing/pledging/revocation of pledge/subscribing) Shares of the Company. I seek your approval for the same under the Company's Code.

I hereby state that--

- a) I do not have access or has not received any price sensitive information as defined in the Code that has not become public, upto the time of signing this undertaking.
- b) In the event that I have access to or receive any unpublished price sensitive information as defined in the code, after the signing of this undertaking but before executing the transaction, shall inform the Compliance Officer of the change in my position and that I / my immediate relatives would completely refrain from trading in the securities of the company until such information becomes public;
- c) I and my immediate relatives have not contravened the provisions of the Code as notified by the company from time to time.
- d) I have made full and true disclosure in the matter.

(Signature of the Applicant)

Date:

UNDERTAKING

To
The Compliance Officer
Aba Ali Habib Securities Private Limited
505, Fifth Floor, Business Plaza Off SBP
I.I Chadriger Road
Karachi.

I, Mr./Ms. _____, resident of _____, hereby declare that I am Director/Officer or Employee/ Designated Person/ Dependent or Immediate Relative of Designated Person of Aba Ali Habib Securities Private Limited.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Code of Conduct to Regulate, Monitor and Report Trading in Securities by Designated Persons ("Code")) up to the time of signing this Undertaking.

In case I have access to or I receive any Unpublished Price Sensitive Information after signing this Undertaking but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would ensure that I or my Dependents/ Immediate Relatives completely refrain from Trading in the Securities of the Company till the time such Unpublished Price Sensitive Information becomes Generally Available Information.

I declare that I have not contravened the Code as notified by the Company from time to time.

I undertake to submit the necessary report within four (4) days of execution of the transaction/a 'Nil' report if the transaction is not undertaken.

I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.

I solemnly affirm and undertake that I have read and understood the employee Trading policy of Aba Ali Habib Securities (Private) Limited. I hereby undertake to abide by all applicable rules and regulations at all time with no exceptions.

(Signature of the Applicant)

Date: