



MARGALLA FINANCIAL (PRIVATE) LIMITED

POLICIES & PROCEDURES

DISCLAIMER

The information contained herein is subject to change without prior notice. While every effort is made to ensure accuracy and completeness of information contained, Margalla Financial (Pvt) Limited makes no guarantee and assumes no liability for any errors or omissions of information. No person can use the information for any claim, demand or cause of action.

INTRODUCTION

Policies and procedures of Margalla Financial (Private) Ltd establish the rules of conduct for clients, employees and the employer. These policies and procedures are in place to protect the rights of employees and clients as well as the business interests of the employer. The policies and procedures also provide a framework to ensure compliance with the regulations and rules as ordained by the Securities and Exchange Commission of Pakistan (SECP) and the Pakistan Stock Exchange (PSX).

CUSTOMER DEALING

- All of our customers are our assets and we will deal with each customer with dignity and respect
- No customer will be discriminated in any way on the basis of sex, caste, colour or religion. Each customer will be dealt in a fair and equal manner
- We will observe a high standard of integrity and fair dealing
- We will act with due care, skill and intelligence
- We will observe high standards of market conduct
- We will take steps to provide public information to each customer which will enable them to make a balanced and informed investment decision
- We will seek from customer information about their circumstances and investment objectives which might reasonably be expected to be relevant in enabling us to fulfill our responsibilities our the customer
- We will avoid any conflict of interest with customers and, whereby such a conflict unavoidably arises, we will ensure fair treatment to the customer by complete disclosure and our interests will never be unfairly placed above those of the customers
- We will protect properly, by way of segregation and identification, all of the customer assets for which we are responsible
- All of the orders placed by the customer shall be recorded in both physical and electronic form and the customer will be apprised of their trading activity through physical (paper based) and/or electronic means (email/sms)

ORDER TAKING AND RECORDING:

- All customers will be advised to call our dedicated line to discuss any matters relating to taking and confirming orders, executing contracts, transferring funds, and queries regarding their accounts. All calls on the dedicated lines will be recorded and records will be kept in digital form on offline and online storage system.
- All calls to customers to discuss matters related to taking and confirming orders, execution of contracts, transferring funds will be done through the dedicated phone line. All calls on the dedicated lines will be recorded and records will be kept in digital form on offline and online storage systems.
- All call recordings will be downloaded at least once every day from Nayatel cloud servers and backup kept on offline storage system.
- All communications to and from customers regarding their orders whether through email, fax, regular mail etc. will be saved and records will be kept in physical or digital format.
- No order taking from customers will be done over personal mobile phones. All customers will be asked to call the phone lines dedicated for that purpose. In case of emergency/malfunction of dedicated lines, only the company provided mobile phone with call recording software will be used as backup.

CUSTOMER COMPLAINTS

- We will encourage all our customers to inform us immediately through verbal or written communication in case of any concerns or grievances
- Each customer complaint will be documented and followed up until resolution is achieved
- We will provide customers with information on how to register their complaints with us
- A dropbox will be provided at each office where customers can put their complaints
- We will also guide our customers on procedures on filing complaints with PSX and SECP in case a satisfactory resolution has not been achieved

ANTI MONEY LAUNDERING/ COUNTERING FINANCING FOR TERRORISM

See separate document titled “AML/CFT Policies and Procedures Manual” for detailed policies and procedures related to this subject.

KYC/CDD

- We will maintain KYC of all customer and update them on a regular basis
- We will confirm the identity of all clients and if the person is acting on behalf of another person, all relevant documents of that person will also be obtained
- In case of non-individual customer, we will establish the ownership and control structure of the organization. All authorized personnel of the organization will be clearly identified.
- We will document in broad terms what the objectives of the clients are and their intentions
- All transactions above PKR 25,000 shall be done through legal banking instruments.
- We will categorize all clients into High, Medium and low risk based on the guidelines as provided by the SECP
- Comply with all guidelines as provided in the PSX document No. KSE/N-1388.

INTERNAL CONTROL AND AUDIT POLICY

- All major decisions that can impact the business of Margalla Financial (Pvt) Ltd will be done only through the approval of the Board of Directors
- All major policies will be disseminated to all employees and relevant board resolution will be posted on the notice board
- Proper records of all transactions will be maintained
- No financial transactions, other than trading activity, beyond PRK 25,000 will be made without prior approval of the authorized signatories of the company
- We will appoint an independent auditor based on the list of approved auditors as provided by the PSX
- We will prepare Annual Financial Reports duly authorized by the independent auditor and provide them to the relevant authorities (PSX, SECP, CDC, NCCPL etc.)
- We will prepare duly audited NCB and provide copies to the relevant authorities
- We will have complete segregation of funds of all clients. For that purpose, a separate bank account will be maintained with the title of "Clients Account"
- We will create sub-Accounts for all clients with the CDC to ensure safety and separation of customer's securities from that of the brokerage house