



Amaan Capital (Private) Limited Policies

FY 2023 -2024

February 12, 2024 – Confidentiality of Information Policy Version 1.0

AMAAN CAPITAL (PVT.) LTD | 1, QASR-E-ZAINAB, CLUB ROAD, KARACHI, PAKISTAN

AMAAN CAPITAL (PRIVATE) LIMITED POLICY

Policy

Confidentiality of Information Policy

Approved by

Board of Directors (Amaan Capital (Private) Limited)

Date of Approval

12 February, 2024

Effective Date

12 February, 2024

1. PURPOSE

1.1 Confidentiality is the only duty owed to a customer that continues forever. This means that even after your relationship ends, you are prohibited from sharing or using information about your former customer. Your brokerage's business model of providing designated or brokerage services can also impact how confidential information is dealt with. This policy will help you understand:

- 1.1.1 How the duty of confidentiality applies to current customers.
- 1.1.2 How the duty of confidentiality applies to past customers.
- 1.1.3 How teams can impact confidentiality and your duties.

1.2 The Securities and Exchange Commission of Pakistan (SECP) has prescribed macro-level principles of "Maintaining Confidentiality of Information" under regulation 15 of the Securities Brokers (Licensing and Operations) Regulations, 2016. Wherein, the securities brokers shall be required to take all reasonable steps including the framing of appropriate policies and procedures to Maintaining Confidentiality of Information by the Securities broker and its employees including sponsors and board members.

2. DEFINING "CONFIDENTIAL BUSINESS INFORMATION"

2.1 Confidential business information is important information about a company that should not be public. If this type of information is disclosed, it could be harmful to the company's success. Confidential business information covers a wide array of subjects that have to do with the workings of a business. Some of this information could include:

- Insider Information as defined under the Securities Act, 2015.
- Trade secrets
- Purchases
- Production processes
- Customer's profile
- Customer's portfolio
- Customers; Sources of income
- Profits and expenditures

2.2 If any of this information, or other information related to business, is released, it could seriously impair the business' ability to operate effectively in the economy.

3. INSIDER INFORMATION/TRADING

3.1 Insider information shall always be treated in strict confidence and relates to facts the knowledge of which could affect an investor's decision about the purchase or sale of listed securities and/or price of listed securities. Further, it also includes, relevant persons responsible for the execution of orders concerning listed securities, which are conveyed by a customer to such person and related to the customer's pending orders.

3.2 In line with regulation 15 of the Securities Brokers (Licensing and Operations) Regulations, 2016, the Sponsors, Directors and employees of the Securities Broker must ensure that no insider information is used when trading in securities of the Company and in other securities on customer's orders, as the case may be, and that this information is not disclosed to third parties.

4. CONFIDENTIALITY

4.1 Information that the Securities Broker has not made public shall be treated in strict confidence. It must not be disclosed to unauthorized third parties during or after the end/termination of the directorship/employment relationship (regardless of reason). It is prohibited to use confidential business information during or after the end/termination of the directorship/employment relationship (regardless of reason) for personal advantage, the advantage of third parties or the disadvantage of the Securities Broker.

4.2 Each director, Executive and Employee of the Securities Broker shall handle confidential data responsibly and with foresight.

4.3 The Securities Broker shall be required to protect the confidentiality of customers, shareholders, or other associates' information always except with the approval of competent officer(s) of the Company where required by law to disclose it.

5. COMMUNICATION AND TRANSPARENCY

5.1 Reports and correspondences to those within the company, customers, business partners,

investors, the public, official organizations, and authorities shall be understandable, truthful, and submitted in good time.

5.2 Such reports and correspondences must also comply with the applicable laws and regulations.

5.3 The Securities Broker shall be required to maintain accurate records of business transactions related to the Company or its customers/associates.

5.4 To avoid a lack of clarity and/or misunderstandings, only expressly authorized official(s) can provide company statements. This applies to communication with the media, investors, and analysts.

6. USE OF COMPANY RESOURCES/ASSETS

Each employee shall handle the company's resources/assets responsibly and ensure their efficient and appropriate use.

7. PROHIBITION ON MULTIPLE EMPLOYMENT

7.1 Employees of the Securities Broker shall not engage with any other business or do any other job without permission of the Securities Broker.

7.2 The Securities Broker will not give its consent as a matter of principle if the secondary employment/business may adversely affect work performance, contradict the employee's duties or if there is a risk of a conflict of interest.

7.3 Non-Executive Directors are exempted from this requirement subject to such restrictions as imposed under the relevant laws, rules, regulations etc. being Director of a listed company, Corporate Brokerage House and otherwise; however, they are required to intimate in prior, the holding of any office/position to the Company.

7.4 Material interests held by employees with a competitor, customer or supplier of the Securities Broker requires the consent of the Company.

7.5 No employee shall exploit the business opportunities of his employer to his or her advantage or the advantage of third parties.

8. CORRUPTION AND BRIBERY

8.1 The employees of the Securities Broker shall not accept gifts whether through financial payments or other means from third parties directly or indirectly to exert an unfair influence.

8.2 No director/employee will use his or her directorship/employment to demand, accept or otherwise acquire unfair advantages.

8.3 Directors/Employees who sign contracts and/or deal with customers/customers or other third parties must ensure that the latter also comply with these rules.

9. GIFTS AND ENTERTAINMENT

Gifts, favours, hospitality, or other benefits may only be given or accepted if they do not infringe applicable laws and/or the Company's Policies and neither damage the public reputation of the Company nor the probity of the director/employee if they become known publicly.

10. OFFICE DECORUM

The Staff shall maintain the office decorum, behave professionally, and follow the Company's code of conduct for the employees.

Approved By



Mr. Aman Aziz Siddiqui

Chief Executive Officer

Amaan Capital (Pvt.) Limited