

**Policies and procedures, systems and controls to resolve customer complaints, handle conflict management, monitor unethical conduct and market abuse, prevent money laundering and combat terrorist financing:**

### **1. Customer Registration**

Open an account by filling and signing the standardized account opening forms (SAOF) including KYC forms and any other form(s) deemed necessary from time to time by PSX and SECP. The compliance officer checks the forms and rates the clients according to the risk category (High, Medium, Low). In case the form is rejected, the compliance officer records the reason(s) and returns the forms to the prospective client with a letter of rejection stating the reason(s). After the compliance officer approves the SAOF, the form is forwarded to the CEO for final approval. If approved by the CEO, the Back Office operator creates a form number and client code on the Back Office software. The client's UIN is then entered into the NCCPL system. When the UIN is activated by the NCCPL, the sub-account is opened in the CDS system and subsequently tagged with the client code in NCCPL. This sub-account opening step is skipped for institutional clients (IDS). A trader is then assigned to the new client. The CDC set-up report and commission slabs are sent to the new client for signatures. Employees are allowed to open an account and trade after approval from the CEO. UIN of all employees is opened in NCCPL and tagged as Employee but CDC sub-account is optional. The compliance officer will periodically check trades of employees and report any unusual activity to the CEO.

### **2. Customer Dealing / Trades Recording**

KATS Operators have the authority to enter orders on the trading terminals after receiving the orders for respective client either through telephone or client's physical presence in the office. All orders received on telephone must be recorded. If the client is physically present in the office, client signature must be taken on the transaction summary report. The telephone recording is retained for a minimum period of six months. The confirmation of orders executed are sent by email or hand delivered to the clients within 24 hours of the trade.

### **3. Settlement of Trades**

Receiving or paying cash is discouraged. Cash above Rs 25,000, if accepted, is reported to the PSX and reasons provided. All payments are made/received by crossed cheques in the name of client as mentioned in the SAOF. All payments/receipts from clients are recorded in the respective client ledger in a timely manner and copies of cheques/deposit slips maintained. Client securities are transferred from the sub-account only as per specific instruction(s) received from client.

