



T&G Securities (Private) Limited.

T&G SECURITIES (PRIVATE) LIMITED

Trec Holder / Broker: Pakistan Stock Exchange Limited.

T&G SECURITIES (PRIVATE) LIMITED

TRE Certificate Holder, PSX

**POLICY AND PROCEDURES OF
MAINTAINING CONFIDENTIALITY OF
INFORMATION**

T&G SECURITIES (PRIVATE) LIMITED

Version 1.0

| Process | Action by | Date |
|---------|--------------------------------|------------|
| 1 | Reviewed by Company Secretary | 13-09-2023 |
| 2 | Approved by Board of Directors | 14-09-2023 |



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Policy and Procedures of Maintaining Confidentiality of Information

1. Purpose:

1.1 Confidentiality is the only duty owed to a client that continues forever. This means that even after your relationship ends, you are prohibited from sharing or using information about your former client. 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 clients.

1.1.2 How the duty of confidentiality applies to past clients.

1.1.3 How teams can impact confidentiality and your duties.

1.2 The Securities and Exchange Commission of Pakistan (the "**Commission**") 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
- Customers' profile
- Customers' 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, in relation to persons responsible for the execution of orders concerning listed securities, which is conveyed by a client to such person and related to the client's pending orders.

3.2 In line with the 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 also in other securities on clients' orders, as the case may be, and that this information is not disclosed to third parties.

4. Confidentiality:

4.1 Information that 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 Securities Broker.

4.2 Each director, Executives 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 clients, shareholders or other associates' information at all times 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, clients, 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 be in compliance 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 clients/associates.
- 5.4 In order to avoid a lack of clarity and/or misunderstandings, only expressly authorized official(s) can provide company statements. This applies in particular 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, contradicts 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 also 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, client 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 own advantage or the advantage of third parties.



8. Corruption, 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 clients/customers or other third parties must ensure that the latter also comply with these rules.

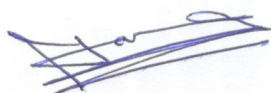
9. Gifts and Entertainment:

Gifts, favors, 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 and behave professionally and follow the Company's code of conduct for the employees.

APPROVED BY



CHIEF EXECUTIVE OFFICER

Dated : September 14, 2023.