

CUSTOMERS DEALING POLICY

SCOPE

Yasir Mahmood Securities (Pvt) Limited shall ensure that not deal in securities on account of customer without instructions of such customer. Appropriate controls must be developed and implemented to ensure this objective including maintenance of evidence of instructions by the customers and matching the trades executed on behalf of customer with the instructions by compliance function on a test basis.

An authorized personnel of a Yasir Mahmood Securities (Pvt) Limited shall take reasonable measures to execute the orders placed by the customers on the most advantageous terms as expeditiously as practical in the prevailing market conditions.

Yasir Mahmood Securities (Pvt) Limited shall ensure to develop customer profile in which all the relevant factors. Customer particulars/ profiles should be maintained through appropriate database and remains available to relevant departments of brokers /inspections. The policy should be implemented across the board and its implementation must be checked by the compliance function.

Yasir Mahmood Securities (Pvt) Limited shall ensure that any updation in client's profile should be supported by reasonable evidence and the same should be reviewed within a reasonable time period by the Compliance function.

Yasir Mahmood Securities (Pvt) Limited shall ensure that reasonable steps/checks should be taken by the securities broker to assess the correctness of information, provided by customer at the time of opening account.

Maintenance of Order Register

All orders to buy or sell securities that a customer may place shall be entered, in the chronological order in an order register (electronic) and order log maintained in a form which shows the name of the person who placed the order and the time at which the order is placed, the name and number of securities to be bought or sold, nature of the transaction clearly indicating the limits of the securities.

Yasir Mahmood Securities (Pvt) Limited further ensure fair treatment of its customers, not discriminate amongst them, and treat customers instruction and orders in due turn.

Orders on Recordings Lines

Yasir Mahmood Securities (Pvt) Limited shall ensure that all orders placed by customers through telephone are recorded over telephone lines.

Yasir Mahmood Securities (Pvt) Limited share ensure that:

- a) All telephone lines to be used by its employees and accredited representatives who are responsible for taking and confirming orders, executing contracts, transferring funds, or carrying out instruction incidental thereto, shall be routed through a centralized call recording system; and
- b) All lines of communication are regularly tested to ensure ongoing proper functioning.

Orders by Visiting Customers

Yasir Mahmood Securities (Pvt) Limited shall ensure that all orders received in-person from visiting customer are adequately recorded and acknowledgment is obtained from the customers.

Orders by Other Means (Email, Fax, and other means)

Yasir Mahmood Securities (Pvt) Limited shall ensure that it has preserved all records pertaining to all orders in writing or through any other document, fax, email, or through any other means.

A walk –in-customer

A walk –in-customer would not be accepted straightway, unless strong identification/reference is given satisfactorily.

Fair Treatment

All Clients are to be treated equally. The only priority is price and time in placing of orders.

DUTIES AND OBLIGATIONS/RIGHTS OF YASIR MAHMOOD SECURITIES TO ITS CUSTOMERS

1- YASIR MAHMOOD SECURITIES shall:

- i. Ensure fair treatment of its customers, not discriminate amongst them, and treat customers` instructions and orders in due turn.
- ii. Exercise due care and diligence while handling unsubstantiated market information or non-public price sensitive information;
- iii. Take reasonable steps to ensure that any agreement, written communication, notification or information that YASIR MAHMOOD SECURITIES gives or sends to customers to whom the services are to be provided or are being provided is presented fairly and clearly and adequate details regarding the services to be provided by the securities broker are covered therein.
- iv. Establish an internal code of practice aimed at ensuring that members of the board, directors, employees and accredited representatives act in accordance with the best interests of its customers, the integrity of the market and are in compliance of the Securities Act, 2015 read with Securities Brokers (Licensing and Operations) Regulations 2016 and any other applicable laws, guidelines, directives, circulars etc.
- v. Frame policies and procedures to ensure compliance with regulatory requirements governing prohibition of insider dealing and market abuse.
- vi. Ensure that „Know Your Customer“ and „Customer Due Diligence“ is being conducted properly in accordance with the relevant regulations/guidelines/circulars etc. issued by SECP from time to time.
- vii. Ensure

that the credit worthiness of YASIR MAHMOOD SECURITIES's customers is evaluated through a proper credit risk assessment methodology and trading limits are assigned to each customer beyond which the customer shall not be allowed to take a position.

2- YASIR MAHMOOD SECURITIES shall not:

- a) Encourage sale or purchase of securities on account of a customer with the sole objective of generating commission or any other financial benefit.
- b) Have an incentive structure that encourages dealing in securities not suiting the risk profile of its customers.
- c) Deal or transact business directly or indirectly or execute an order for a customer where the name of such customer is appearing on the list of delinquent customers maintained by the SECP.
- d) Accept any money from a customer on a promise of predetermined or guaranteed return