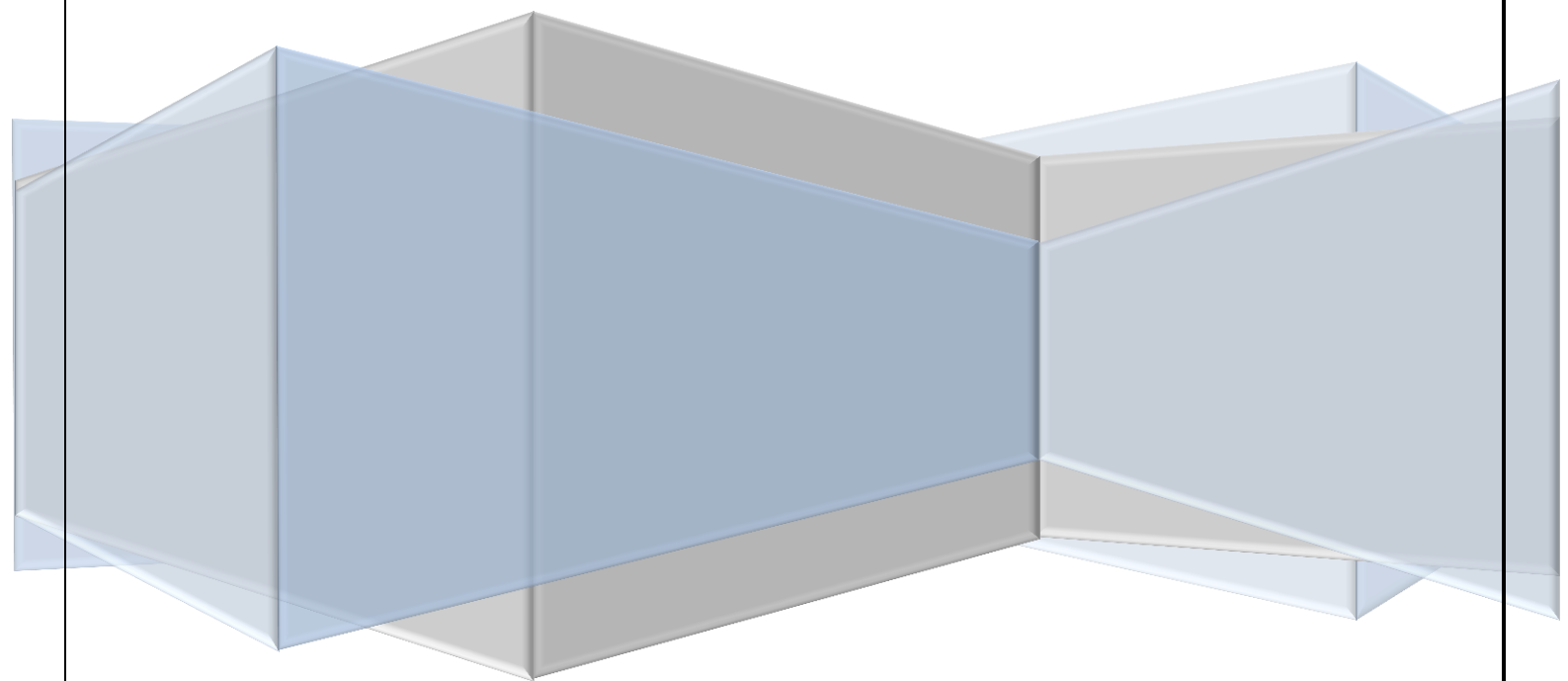


TRUST SECURITIES & BROKERAGE LIMITED

CODE OF CONDUCT



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- ❖ Trust Securities & Brokerage Limited will conduct its business with honesty, integrity and in accordance with the highest professional and legal standards. With the formation of the new board, the company has adopted a comprehensive Code Of Conduct for the members of the Board and its employees. The code will consist of acceptable and unacceptable behavior, guidance to Directors and employees in situations which may arise and foster a culture of honesty, accountability and standards of personal and professional integrity.

❖ CODE OF CONDUCT FOR DIRECTORS

Confidentiality: The Board of Directors must maintain confidentiality of all information entrusted upon them by the company except when disclosure is authorized by the Company Chairman or when legally mandated.

Honesty, Integrity and Fair Dealing: Directors of the Board must act honestly and fairly as well as comply to the highest ethical standards in dealing with all the stakeholders of the company.

Trading in Company Share: Complying to the code of conduct, the Directors will restrict/report to any trading in the company shares. The Directors would be required to remain compliant with the statutory requirements.

Compliance with Laws, Rules and Regulations: The Directors shall comply with laws, rules and regulations applicable to the company, including but not limited to the Companies Act 2017, Listing Regulations of the Pakistan Stock Exchange and Insider Trading laws.

Corporate Opportunities: Directors are prohibited from taking personal opportunities related to the company's business, using sensitive information, company's property for personal gain or competing with the company for business opportunities.

Conflict of Interests: Each Director must avoid conflict of interest between the Director and company and where such a situations arises, it may reasonably be expected to disclose it promptly.

Reporting of possible Illegal or Unethical Behavior: Each Director should take steps to ensure that the company promotes ethical behavior. Employees should be encouraged to talk to supervisors, managers or other appropriate personal when in doubt about a particular situation. Employees should also be encouraged to report violation of laws, rules, company policies and procedures to appropriate personal.

Compliance Procedures: Directors should disclose any suspected violations of this code promptly in the immediate upcoming meeting of the Board of Directors

❖ **CODE FOR EMPLOYEES**

Conflict of Interests: Employees/Trainees must not engage in any activity or transaction which may result to a rise of conflict between their personal interests and the interest of the company.

Political Contribution: No funds or assets should be contributed to any political party or organization or a certain individual who either holds public office or is a candidate for public office except where permitted by law

Bribes and Commercial Payments: An employee must not give or receive bribes or other payments which are intended to influence a business decision or compromise to the company's reputation.

Disclosure of Disbursements, Funds, Assets and Receipts: Disbursements of funds, assets and receipts must be properly recorded in the books of the company

Agreements with Agents and Clients: The employee must disclose in writing on any such agreements stating clearly the services to be performed, the amount to be paid or any such dealing with Agents or Clients

Relations with Suppliers, Vendors, Agents and Other Third Parties: The employee will make it visible to the relevant personnel or managers on the relations or agreements with certain Vendors, Agents and any sort of Third Party of which details or dealings are to be made public

Confidentiality and Disclosure Of Information: Employees/Trainees are to safeguard all confidential information about the company activities and must not without authority; disclose such information to the press, outside source or other employees.

Health & Safety: Every Employee/Trainee at work must take responsibility of personal health and hygiene as well as the safety for him/herself and others including visitors.

Unsolicited Gifts: Accepting gifts that might place an employee under obligation is strictly prohibited. All employees must decline any such offer which may result in harm to the company or people related to it.

Company and Personal Property: An employee must not take or use the company property or property of another employee without permission nor must the employee use company property/stationary for private purposes without the management's permission.

Rumor Mongering: Rumor Mongering, allegations and accusations with the purpose of negatively influencing and manipulating the minds and emotions of fellow employees is strictly prohibited

Harassment: The company will not tolerate verbal or physical misconduct by an employee that harasses or interferes with another's work performance, humiliate or create a hostile environment.

WORKPLACE ENVIRONMENT

❖ DISTRIBUTION OR SALE OF MATERIALS

The purpose of this policy is to establish the company's intent to have a work environment that is free from solicitation and distribution efforts that do not relate to company's business or interest.

Employees of the company are restricted on distribution or sale of any sort of material which affects the image of the company. Special emphasis is laid on politically related material in view of the personal capacity of the employee.

❖ DRUG FREE WORKPLACE POLICY

Trust Securities and Brokerage Limited in order to appropriately serve the needs of both the employees and clients has implemented a drug free workplace policy which has been made keeping in view the law of the land.

The company will be very strict on implementing the above whereby the employees should stay disciplined and respect the professional environment of the company. No use of illegal drug or alcohol will be allowed within the premises.

The company reserves the right to report and handover such an employee which having been suspected of use of drug or alcohol to the government authorities.

❖ SAFETY

All work related injuries/illness must be reported immediately to your supervisor/manager and should be treated properly.

It is the responsibility of each employee to maintain their work area and tidiness. Cleaning your work area at the end of each work day and maintaining the desk is act of personal hygiene. All measures should be taken to go paperless in order to save the environment as well as maintaining a safety of documents and potential fire hazards.

Access should not be blocked from Fire Alarms, Fire Equipment, Fire Doors, Exits, Walkways, Electric Panels, etc.

Clothing of each employee should be appropriate for the job and designation.

Only qualified personal are permitted to repair or operate such an equipment which

falls under the relevant department such as the computers, scanners, printers, etc for the I.T Department.

Proper waste disposal should be managed under the relevant department and where required gloves should be worn to dispose the trash.

Eating and drinking is permitted on the work desk while keeping in mind the cleanliness of the workplace and where the food has been eaten.

Containers in the lunchroom/cafeteria need to be labelled as to avoid wrong consumption.

Emergency Numbers for Ambulance, Police, Fire Safety, etc. should be well displayed in each department in order to maintain the safety standards.

Maintenance and Repair Work of Office Equipment or a certain area should be reported in advance and displayed on the notice board.

Use of Office before or after working hours should be reported and responsibility to lock outer doors should be the sole responsibility of the relevant employee(s).

Smoking is permitted only in the designated areas to keep the environment and health standards of others.