

CDD / KYC Policy for Investors

1. Introduction

This Customer Due Diligence (CDD) and Know Your Customer (KYC) Policy has been developed in compliance with the Securities and Exchange Commission of Pakistan (SECP) regulations, the Pakistan Stock Exchange (PSX) Rule Book, Anti-Money Laundering (AML) Laws, and applicable regulatory requirements. The objective of this policy is to establish robust procedures for verifying the identity of investors, preventing money laundering, ensuring transparency, and safeguarding the integrity of the capital markets.

2. Customer Identification (KYC)

All investors must provide the following verified documents before account opening:

- CNIC / NICOP / Passport (verified through NADRA Verisys)
- Proof of Address (Utility Bill, Bank Statement, Rent Agreement)
- Source of Income / Occupation details
- Bank Account Verification (IBAN in investor's name)
- Recent Passport Size Photograph

For **Corporate / Institutional Clients**:

- Certificate of Incorporation
- Memorandum & Articles of Association
- Board Resolution authorizing account opening
- List of Directors / Authorized Signatories
- NTN Certificate

3. Customer Due Diligence (CDD)

The brokerage will conduct due diligence by:

1. Identifying and verifying the client's identity.
2. Assessing the risk profile of the customer (Low, Medium, High).
3. Screening against international and local sanction lists (UN, SECP, NACTA).



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4. Understanding the purpose of investment and source of funds.
5. Applying Enhanced Due Diligence (EDD) for:
 - Politically Exposed Persons (PEPs)
 - High-risk investors
 - Foreign nationals

4. Ongoing Monitoring

- All investor accounts and transactions will be monitored regularly.
- Any suspicious transaction will be reported to the Financial Monitoring Unit (FMU).
- Annual KYC updates will be conducted.

5. Risk Categorization

- **Low Risk:** Salaried individuals, small investors
- **Medium Risk:** Businesspersons, medium-scale investors
- **High Risk:** Politically Exposed Persons (PEPs), foreign clients, offshore entities

6. Record Keeping

- All records and documents will be preserved for at least 10 years.
- Both physical and electronic formats will be maintained.

7. Investor Awareness

This policy is publicly available on the brokerage's website under the **"Investor Information / Compliance"** section. Investors are encouraged to review it carefully and comply with all KYC requirements for secure trading.


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