

# **INVESLINK CAPITAL (PVT) LTD**

## **PSX TREC HOLDER**

### **TRADING BY EMPLOYEES OF BROKERAGE HOUSE:**

1. Inveslink Capital (Pvt) Ltd may allow securities trading to their employees only through Inveslink Capital (Pvt) Ltd.
2. Inveslink Capital (Pvt) Ltd shall register their all employees into the UIN database with all registration details including their respective designations and update/modify the registration details whenever any change occurs within five (5) working days from the date of employment or any change in his/her registration details, as the case may be.
3. Inveslink Capital (Pvt) Ltd shall ensure that while trading, the concerned employee strictly observes the Code of Conduct prescribed by the Exchange, which is annexed in Annexure-II.

### **Annexure-II.**

### **CODE OF CONDUCT FOR TRADING BY EMPLOYEES**

1. Employees of Inveslink Capital (Pvt) Ltd desirous of trading must obtain prior written authorization for such activity from the Securities Broker or authorized officer of the Securities Broker on his trading account opening form.
2. Employee must submit to the Inveslink Capital (Pvt) Ltd or authorized officer of the Inveslink Capital (Pvt) Ltd, a written undertaking of his understanding and willingness to strictly abide by all the relevant rules, regulations, codes and procedures as prescribed by the Exchange, Clearing Company, Depository Company and the Commission at all times while trading on his own account.
3. The provisions of chapter 7 of Regulations or any other Regulation which may be made from time to time in this regard would be applicable to such trades.
4. All trades on behalf of the employees concerned shall be executed against their own respective UINs and shall be subject to these Regulations.
5. Employees must ensure that investment advice given to clients by them does not result in a conflict of interest with their individual trading activities.
6. The employees should not indulge in buying or selling securities of a company for their own account or any account over which they exercise control if they possess non-public information or inside information of that company or information pertaining to any potential trade/deal which may affect the share price of that company. Further, they will not pass any such information to others.
7. The employees should not buy or sell those securities for their own account in which they are aware of clients' proposed trades, trades by the Securities Broker or forthcoming research report regarding such securities.

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8. Inveslink Capital (Pvt) Ltd shall monitor their employees' trades regularly and the Internal Audit Department will ensure compliance of these Regulations and any violation shall be communicated to Audit Committee/Chief Executive Officer and shall be submitted to the Exchange and/or the Commission as and when demanded.

9. Adherence by Inveslink Capital (Pvt) Ltd as well as their employees, in letter and spirit, to this Code of Conduct is mandatory.