



AML / CFT / CPF POLICY & PROCEDURES

Javed Iqbal Securities (Pvt) Ltd.

Policy Date: 15 October 2025

This policy is made, adopted and maintained at the office of **Javed Iqbal Securities (Pvt) Ltd.**, situated at **Room # 7 & 8, Pakistan Stock Exchange Building, Mezzanine Floor, 19 Khayaban-e-Aiwan-e-Iqbal, Lahore, 54000**. The Company operates as a securities brokerage firm at Pakistan Stock Exchange Limited (PSX).

1. Purpose and Regulatory Basis

Javed Iqbal Securities (Pvt) Ltd., a securities brokerage firm of Pakistan Stock Exchange Limited (PSX), adopts this policy to prevent money laundering, terrorist financing and proliferation financing. The Company shall comply with the Anti-Money Laundering Act, 2010, applicable SECP AML/CFT/CPF Regulations, PSX requirements and directives of competent authorities, as amended from time to time.

2. Scope and Responsibility

These requirements apply to all customers, beneficial owners, authorized persons, directors and employees involved in account opening, dealing, settlement, compliance and record keeping. The Chief Executive Officer has overall responsibility; the designated Compliance Officer administers day-to-day AML/CFT/CPF controls.

3. Customer Due Diligence (CDD/KYC)

Before establishing a business relationship, the Company shall identify and verify the customer and beneficial owner using reliable documents/data; understand the purpose and intended nature of the relationship; obtain required source-of-income/source-of-funds information; and ensure the account is opened and operated in the correct name and UIN. Anonymous, fictitious or benami accounts are prohibited.

4. Risk-Based Approach

The Company shall assess customer risk considering customer type, occupation/business, geography, products/services, delivery channel, transaction pattern and other relevant factors. Higher-risk relationships shall be subject to enhanced due diligence and senior-management approval where required. Simplified measures may only be applied where permitted by law.

5. PEP, Sanctions and TFS Screening

Customers, beneficial owners and connected persons shall be screened, as applicable, for Politically Exposed Person status and against United Nations Security Council and



Pakistan-designated/sanctions lists. The Company shall immediately apply freezing/prohibition requirements and reporting obligations where a true match is identified.

6. Ongoing Monitoring

The Company shall monitor customer activity against the customer's profile and expected activity. Unusual, complex, large or apparently purposeless transactions shall be examined. KYC/CDD information shall be updated periodically and when material changes are identified.

7. Suspicious Transaction and Currency Transaction Reporting

Employees shall promptly refer unusual or suspicious activity to the Compliance Officer. The Compliance Officer shall assess and file STRs and CTRs with the Financial Monitoring Unit where legally required. Tipping-off a customer or any unauthorized person regarding an STR or related inquiry is prohibited.

8. Record Keeping

CDD/KYC records, account documents, transaction records, correspondence, screening evidence and AML/CFT/CPF review records shall be retained for the period prescribed by applicable law/regulation and shall be readily retrievable for SECP, PSX, FMU or other competent authorities.

9. Employee Screening and Training

Relevant employees shall be screened before/at employment as appropriate and shall receive periodic AML/CFT/CPF training covering red flags, sanctions/TFS, suspicious transaction escalation and confidentiality.

10. Independent Review and Breaches

AML/CFT/CPF controls shall be independently reviewed periodically. Deficiencies shall be documented, reported to management and corrected promptly. Any deliberate breach may result in disciplinary action and regulatory reporting.

11. Review

This policy shall be reviewed at least annually and whenever applicable AML/CFT/CPF laws, SECP regulations or PSX requirements change.

Regulatory Application: This policy shall be read and implemented together with the applicable laws, SECP regulations and directives, PSX Regulations/Rule Book, and applicable NCCPL and CDC requirements, as amended from time to time. Where a regulatory requirement is stricter than this policy, the regulatory requirement shall prevail.

APPROVED BY

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TREC # PSX/288 PAKISTAN STOCK EXCHANGE

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Javed Iqbal

Chief Executive Officer

Date: _____

Company Stamp: _____



Ali Javaid

Executive Director

Date: _____

