



INTERNAL CONTROL POLICY / INTERNAL CONTROL SYSTEM & PROCEDURES

Javed Iqbal Securities (Pvt) Ltd.

Policy Date: 20 November 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

Javed Iqbal Securities (Pvt) Ltd. shall maintain an effective internal control system appropriate to its activities as a PSX securities brokerage firm to safeguard client assets, ensure accurate books and records, support reliable regulatory reporting and ensure compliance with PSX, SECP, NCCPL and CDC requirements.

2. Governance and Responsibility

The Chief Executive Officer is responsible for the overall control environment. The Executive Director, Compliance Officer and responsible departmental personnel shall implement controls within their functions. Duties and authority shall be clearly assigned.

3. Segregation of Duties

Front-office dealing, back-office recording, settlement, accounting, reconciliation and authorization functions shall be segregated as far as practicable. Persons executing client/proprietary trades shall not be permitted to improperly alter back-office records. Where staffing limits full segregation, documented supervisory review shall operate as a compensating control.

4. Customer Account Controls

Accounts shall be opened only after completion of prescribed account-opening, KYC/CDD, UIN and documentation requirements. Changes to customer particulars, bank details, authorized persons or account status shall be properly verified, authorized and recorded.

5. Order and Trade Controls

Customer orders shall be received through authorized channels and executed by authorized personnel. Required order evidence, chronological logs, trade records and confirmations shall be maintained. Unauthorized trading, misuse of client accounts, wash trades, insider trading and other prohibited practices shall be prevented and escalated.

6. Client Money and Securities



Client money and securities shall be handled and segregated in accordance with applicable PSX, SECP, NCCPL and CDC requirements. Payments, withdrawals, securities transfers and journal entries shall require appropriate supporting evidence and authorization.

7. Reconciliations

Bank balances, client ledgers, CDC balances, NCCPL obligations, securities positions and other relevant control accounts shall be reconciled at prescribed intervals. Exceptions shall be investigated and resolved promptly.

8. System and Access Controls

Access to trading, back-office, accounting and regulatory systems shall be role-based and restricted to authorized users. Shared credentials are prohibited. Access shall be changed or revoked promptly when duties or employment change.

9. Compliance and Supervisory Review

The Compliance Officer shall monitor adherence to regulatory and internal requirements. Management shall review material exceptions, complaints, unusual transactions and unresolved reconciliation differences. Corrective actions shall be documented.

10. Records and Audit Trail

The Company shall maintain complete, accurate and retrievable books, order records, transaction records, approvals, reconciliations and supporting documents for the regulatory retention period.

11. Review

Internal controls shall be reviewed periodically through compliance, internal/system audit and management review. Material weaknesses shall be reported to the Chief Executive Officer and corrected without undue delay.

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

APPROVED BY



TREC # PSX/288 PAKISTAN STOCK EXCHANGE

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Javed Iqbal

Chief Executive Officer

Date: _____

Company Stamp: _____



Ali Javaid

Executive Director

Date: _____