

Policy and procedure for Confidentiality of Information of Value Stock and Commodities (Pvt) Ltd.

- 1) Creation of "Chinese walls" in order to prevent the improper or unintended dissemination of market sensitive information from one division or department to another of VSCL.
- 2) Physical infrastructure such as restricted entry and locked doors with access to authorized persons only and strict restriction on use of cellular phones in all dealing areas would be applicable to all employees inclusive of the senior management.
- 3) All employees shall refrain from trading on the basis of confidential information and shall not reveal any such information out the the VSCL.
- 4) The Company and its employees shall not disclose or discuss with any other person other than normal course of business or make improper use of the details of investments of customers and other information of confidential nature of a customer.
- 5) Chinese walls within VSCL exist between the employees of sales department (designated as "Public Side") and all other departments of the company to confidential information.

PUBLIC VS. PRIVATE SIDE	
PUBLIC	PRIVATE
Equity Sales & trading personnel	<ul style="list-style-type: none"> ● Back office ● Accounts Department ● Administration Department ● IT Department ● Audit and Compliance Department

Rules relating to the Chinese wall include:

- Office Space for the public side is segregated from the private side employees entrance is restricted to sales and trading person.
- Private side employees are prohibited from sharing any customer related information with public side employees, either verbally or in written.
- The use of cellular devices is strictly prohibited in all dealing and trading areas for all staff member.

6) The Confidentiality of information is being monitored and implemented strictly in accordance with the provisions of Regulation 15 of Securities Broker (Licensing and Operations) Regulations 2016 which may be updated time to time in this regard the compliance shall assure that;

The Policy is duly approved by BOD on June 22, 2018

Office # 1, Value Tower, 13/B1 B2
 Commercial Zone, Ghalib Market,
 Gulberg III, Lahore, Pakistan.
 +92 (0) 42 35711050-54
 www.valuestock.pk

 Valuestock.pk

Head Office
 Room # 114, South Tower, LSE Plaza, 19-Khayaban-e-Aiwan-Iqbal, Lahore.
 +92 (0) 42 36314415-17 +92 (0) 301 8484000

Faisalabad Office:
 Room # 520, 5th Floor, State Life Building Civil Lines, Faisalabad.
 +92 (0) 41 2626548 +92 (0) 41 2615159

Lahore Stock Exchange 2nd Branch: (PMEX)
 Room # 116, 6th Floor, LSE Plaza, 19-Khayaban-e-Aiwan-Iqbal, Lahore.
 +92 (0) 42 36300046

