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# CLIENTS DEALING POLICY

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MARCH 1, 2017  
SPINZER EQUITIES (PVT) LTD  
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Policy No.: 0005  
Effective Date: 1<sup>ST</sup> March, 2017

### Purpose:

To establish a policy for fair dealing of clients including fulfillment of ancillary requirements.

### Scope:

Applies to all company employees including Directors.

### Responsible Party:

Equity Manager/Admin Manager

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## Policy & Procedures:

### Client Fair Dealing:

1. Clients should be dealt fairly at all times. There should be no discrimination between any clients while dealing them. (Discrimination includes preference made between High Net worth Clients and Medium or Low Net worth Clients.)
2. Order of placing a Bid or Offer should not be manipulated/discriminated for any clients including directors/officers of the company, and should be placed on first come, first serve basis.
3. In case of any query from a client, he/she should be guided properly or else sent to responsible officer for proper guidance.
4. "Client is always right" policy should be always followed. Except in cases where the client stance is adversely affecting any of our company's policies or PSX or SECP's guidelines or regulations.

### Order Register Maintenance:

1. Clients' daily orders are to be maintained on a manual register or be saved from KATs Terminal and printed or saved in a folder on computer on daily basis.
2. Register maintenance is to be reviewed by Compliance Officer on weekly basis.

### Order Recording:

1. All clients' orders are to be recorded whether on telephone or placed physically present.
2. For orders placed on telephone; telephone recorders are to be placed on every telephone receiving clients' orders.
3. The records are to be maintained for at least ten years.
4. For clients' visiting the office for trading; daily trade logs are to be signed from the respective clients.
5. Clients' daily trades are to be emailed daily on their registered email addresses at the end of the trade day.
6. In-case of malfunction of telephone recording system, Compliance officer & CEO are to be informed and necessary actions to restore the recording system must be taken immediately. However, during this malfunction, signed trade logs shall be kept from the clients ordering through telephones.

### Regular Testing of Clients:

1. Compliance Officer is required to test the recording lines on monthly basis and report to CEO on the next working day in case of any non-compliance regarding recording of telephone lines.

### Walk-in Customers:

1. All walk-in customers are to be treated fairly.
2. Reference must be asked from the walk-in customers. The person who referred then must be contacted for scrutiny of the walk-in client.
3. In case there is no reference then, the walk-in client must be scrutinized asking at least the following questions:
  - a. Does he have any experience of trading?
  - b. Whether he has a trading account with any other house?
  - c. What is his source of income?
  - d. What are his views about trading & what is his usual style of trading?
4. Any other scrutinization method is also suggested for inspection of walk-in customers.
5. If there seems to be no doubt, and proper documentation is available, then the walk-in client account can be opened.

### Clients Complaints:

1. Proper complaint box is to be placed at a proper displayable place in reach of clients for registration of complaints by clients.
2. The box shall be under control of Admin Manager and all the complaints shall be reviewed by CEO on weekly basis.

3. An email ID shall also be created for online submission of any complaints which shall be under control of Compliance Officer.
4. In case of receiving of any complaints, the complaints are to be reported to the concerned department and be resolved at the earliest.
5. If the complaint is of very serious nature and needs guidance and the complaint shall be referred to Company Secretary. If Company Secretary does not have the powers to resolve then it will be forwarded to CEO.
6. All complaints are to be resolved amicably and the complainant will not be harassed at any stage.
7. In case of any harassment, the concerned officer will be penalized.