

Code of Conduct

Lakson Investments Limited



CONTENTS

1. Mission
2. Vision
3. Business Principles
4. Statement of Ethics
5. Statement of Business Practices
 - a. Relationship with Responsibilities to Clients and Prospects
 - b. Relationships with and Responsibilities to the Employer
 - c. Fundamental Responsibilities

MISSION

To deliver superior performance as measured by market share parameters, high-quality service and a portfolio of innovative yet tailored products across a range of investment disciplines and distribution channels. To provide a fulfilling, stimulating and supportive environment for our employees that fosters their personal growth and facilitates our productivity as a team.

VISION

To be a top quartile provider of investment solutions to both individuals and institutions. Through the success of our clients and employees we seek to build sustainable and long-term shareholder value, and to be an employer of choice in the asset management industry.

BUSINESS PRINCIPLES

- Our investors' interests always come first. We believe that if we serve our clients well, our own success will follow.
- Integrity and honesty are at the heart of our business. We expect our people to maintain high ethical standards.
- Our commitment to our clients, integrity, professional excellence, entrepreneurial spirit and teamwork will set us apart.
- Our firm shares bonuses with all employees - not just top management, but also those who perform standard administrative and clerical duties.
- Our goal is to provide superior returns to our shareholders. Profitability is critical to achieving superior returns, building our capital, and attracting and keeping the best people.
- Our business is highly competitive and we will aggressively seek to expand our client relationships. However, we are always fair competitors and never denigrate other firms.

In carrying out the business operations, the Company shall

- ensure that the investment decisions and all related actions are in accordance with the investment policy, objectives and restrictions including risk parameters, as stated in the investment documents (constitutive documents and investment mandates, other related documents);
- not carry out any transaction on behalf of client's with any of its connected person unless such transaction is carried out on arm's length terms and with appropriate disclosure;
- not trade excessively on behalf of the clients, taking into account the stated investments objective of the clients;

- take necessary measures for restricting excessive trading that cannot be directly linked to a profitable trade for the CIS, and ensure that only the minimal number of trades take place taking into account the schemes' stated objectives;
- take measures for always ensuring that the best price and terms are negotiated when trading in securities, in the interest of the CIS investors;
- establish mechanism for ongoing and timely unit / certificate holder communications such as Collective Investment Scheme's portfolio information, which does not contain any inaccurate or misleading information;
- establish proper procedures to ensure confidentiality of clients' information
- establish mechanism and process for proper and timely handling of any client complaints along with details of dedicated personnel to deal with such matters
- not involve directly or indirectly in the mis-selling of securities
- not directly or indirectly sell securities by making a false or misleading statement
- not directly or indirectly sell securities by concealing or omitting material facts of investments
- not directly or indirectly sell securities by concealing the associated risk factors of the scheme
- not assume and issue any type of guarantee ,in relation to and on behalf of the portfolio managed by investment advisor

STATEMENT OF ETHICS

The Directors and the Employees of the Company shall always and at all times:

- Act with integrity, competence, and dignity and in an ethical manner when dealing the public, clients, prospects and employees and peers.
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on their profession and the Company.
- Strive to maintain and improve their competence and the competence of others in profession.
- Use reasonable care and exercise independent professional judgment.
- Refrain from divulgence of information.

The Employees of the Company shall also always and at all times:

- Ensure good attendance and punctuality and demonstrate a consistently good record in this area. For any absence during working hours, they shall obtain written permission of their immediate supervisor.
- Maintain a standard of personal hygiene and dress appropriately for attendance at work. Their appearance must inspire confidence and convey a sense of professionalism.
- As personal responsibility, safeguard both the tangible and intangible assets of Company that are under their personal control and shall not use Company's assets for their personal benefits except where permitted by Company.
- Not indulge in any kind of harassment including sexual harassment or intimidation whether committed by or against any senior/junior, co-worker, customer, vendor or visitor. They shall not use language, written or spoken in intra-office communication(s) or communication(s) with individual(s) outside the office that may contain any statement or material that is offensive to others.
- Meet their responsibilities to fellow employees, customers and investors they shall help in maintaining a healthy and productive work environment and shall not engage in the selling, manufacturing, distributing, using, any illegal substance or being under the influence of illegal drugs while on the job.
- Ensure strict adherence to all health and safety policies as may be implemented from time to time by the Company.
- Not give any interview in the print/ electronic media or have their photograph displayed or act in television / stage plays or in cinema without having permission from the competent authority.

STATEMENT OF BUSINESS PRACTICES

Fundamental Responsibilities

Compliance with Applicable Laws & Regulations

- Conform to and abide by the Company's rules and obey all lawful orders and directives which may from time to time be given by any person or persons under whose jurisdiction, superintendence or control they may for the time being, be placed. They shall comply with and observe all applicable laws, regulations and Company policies.
- Stand firmly against supporting the activities of any group or individual that unlawfully threatens public order and safety. They shall not express views detrimental to the ideology, sovereignty or integrity of Pakistan.
- Not bring or attempt to bring political or other pressure/influence directly or indirectly to bear on the authorities / superior officers or indulge in derogatory pamphleteering, contribute, or write letters to the news papers, anonymously or in their own name with an intent to induce the authority/superior officers to act in a manner inconsistent with rules, in respect of any matter relating to appointment, promotion, transfer, punishment, retirement or for any other conditions of service of employment.

Integrity

- Conduct themselves with the highest standards of ethics, professional integrity and dignity in all dealings with the public, clients, investors and employees and not engage in acts discreditable to the Company, profession and nation. If they become aware of any irregularity that might affect the interests of the Company, they shall inform the senior management immediately.
- Maintain all books, data, information and records with scrupulous integrity, reporting in an accurate and timely manner all transactions / reports.
- Avoid all such circumstance in which there is personal interest conflict, or may appear to be in conflict, with the interests of the Company or its customers.
- Not use their employment status to seek personal gain from those doing business or seeking to do business with the Company, nor accept such gain if offered. They shall not accept any gift, favour, entertainment or other benefits the size or frequency of which exceeds normal business contacts from a constituent or a subordinate employee of the Company or from persons likely to have dealings with the Company and candidates for employment in Company.

Confidentiality

- Maintain the privacy and confidentiality of all the information acquired during the course of professional activities and refrain from disclosing the same unless otherwise required by statutory authorities/law. All such information will remain as a trust and will only be used for the purpose for which it is intended and will not be used for the personal benefits of any individual(s). Inside information about Company's customers/affairs shall not be used for their own gain or for that of others either directly or indirectly.

Professionalism

- Serve the Company honestly and faithfully and shall strictly serve Company's affairs. They shall use utmost endeavor to promote the interest and goodwill of the Company and shall show courtesy and attention in all transactions/correspondence with officers of Government, Securities & Exchange Commission of Pakistan other Authorities and Financial Institutions.
- Not engage in Money Laundering and will be extremely vigilant in protecting the Company from being misused by anyone to launder money by strictly complying with "Know Your Customer" policies and procedures as stipulated in the Rules & Regulations for the Non-Banking Finance Companies.

Relationships with and Responsibilities to the Employer

- 1- Employees shall not undertake any independent practice that could result in compensation or other benefit in competition with their employer unless they obtain written consent from both their employer and the person or entities from which they undertake independent practice.
- 2- Employees shall disclose to the employer all beneficial ownership of securities or other investments.
- 3- Employees shall disclose to the employer all matters that could be expected to interfere with their duty to the employer or ability to make unbiased and objective recommendations.
- 4- Comply with prohibitions or activities imposed by their employer if a conflict of interest exist.
- 5- Employees with supervisory responsibilities, authority or the ability to influence the conduct of others shall exercise reasonable supervision over those subject to their supervision or authority to prevent any violation of applicable statutes or regulations.
- 6- Ensure proper flow of adequate information.

Relationship with Responsibilities to Clients and Prospects

- 1- Employees shall exercise diligence and thoroughness in making investment recommendation or in taking investment actions.
- 2- Have a reasonable and adequate basis, supported by appropriate research and investigation, for such recommendations or actions.
- 3- Make reasonable or diligent efforts to avoid any material misrepresentation in any research and investigations, for investment recommendations.
- 4- Maintain appropriate records to support the reasonableness of such recommendation or action.
- 5- Employees shall use reasonable care and judgment to achieve and maintain independence and objectivity in making investment recommendation or action.
- 6- Employees must act for the benefit of their clients and place their clients' interests before their own.
- 7- Employees shall preserve the confidentiality of information communicated by clients, prospect or employers concerning matters within the scope of client-employee or employer-employee relationships unless the employee receives information concerning illegal activities on the part of the client, prospect or employer. The Employee must bring the attention of the Supervisor on such illegal activities.
- 8- Employees shall not make any statements, orally or in writing, that misrepresent:
 - a- The services that they or their Company is capable of performing
 - b- Their qualifications or the qualifications of their Company
 - c- The employees' academic or professional credentials
 - d- Employees shall not make or imply, orally or in writing, any assurance or guarantees regarding any investment except to communicate accurate information regarding the terms of the investment instrument and the issuer's obligations under the instrument.
- 9- Employees shall not make any statement, orally or in writing, that misrepresent the investment performance that they or their Company has accomplished or can reasonably be expected to achieve.
- 10- If employees communicate individual or Company performance information directly or indirectly to clients or prospective clients or in a manner intended to be received by clients or

prospective client, employees shall make reasonable effort to assure that such performance information is fair, accurate and complete presentation of such performance.

- 11- Employees speaking to clients, investors or potential investors shall always speak on the recorded lines.