

UNETHICAL CONDUCT & MARKET ABUSE POLICY

ARN Securities Private Limited

ARN SECURITIES (PRIVATE) LIMITED

GOALS & OBJECTIVES

The objective of this policy is to that sufficient and appropriate controls exists to the monitoring and prevention of unethical conduct and market abuse.

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Policy Statement

ARNSPL has a strict policy of demonstrating ethical and professional attitude and behavior.

ARNSPL has a policy of zero tolerance in the application and compliance with this policy document and this policy is applicable to all the functional areas and resources of the organization

Risk Management Systems

1. ARNSPL will have a Risk Management System through Eclear Services Limited that will manage clients trading and exposure limits
2. The allowed trading limits will be assigned by the RMS based on the actual cash balances of the clients
3. Order Management System (Also provided by Eclear Services) will be tightly integrated with the RMS that will control and manage clients' limits
4. No order will be executed that's in excess of the available cash balance of the clients
5. None of our staff is allowed to place trades on behalf of clients
6. As an online only company, we will not be doing proprietary trading and all our employees will be restricted to trade within predetermined limits
7. Their trading limits will be linked to their verified incomes as per the tax records
8. As a strict policy, we will not be doing or offering short selling of securities

Communication with Clients

1. All communication to our clients will be through our registered modes of communication which will be communicated to our clients at the time of account opening.
2. A proper record and log of all these communications will be maintained in controlled custody
3. As a strict policy, no communication will be made promising any returns or rewards to our clients
4. All our clients will be given an investor's guide vol 1 and 2, as published by SECP, at the time of account opening
5. Our commission rates will be in writing communicated to our clients and their acknowledgement will be taken at the time of account opening
6. All the risks in IBFT and investments in capital market will be communicated to our clients and their acknowledgement taken at the time of account opening

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7. SMS will be sent to all our clients for all trades executed by them at the end of each day
8. Client statements will be sent to them on a monthly basis