



Centinel Securities Pvt. Ltd.

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CENTINEL SECURITIES (PRIVATE) LIMITED

PAKISTAN STOCK EXCHANGE TRE CERTIFICATE NO. 551

Confidentiality and Data

Protection Policy

S.No.	Detail	Date
1.	Prepared by Compliance Officer	23 June 2025
2.	Reviewed & Approved by CEO	26 June 2025

Confidentiality and Data Protection Policy

1. Purpose

1.1 The obligation to maintain a client's confidentiality is ongoing and does not end with the termination of a business relationship. Even after the formal association with a client concludes, any personal or sensitive information learned must not be disclosed or used. The way confidential data is managed may also depend on the business model adopted by the brokerage—whether designated or otherwise. This policy outlines:

- 1.1.1 How confidentiality should be maintained for active clients.
- 1.1.2 How it applies to clients with whom the business relationship has ended.
- 1.1.3 The impact of team-based services on confidentiality responsibilities.

1.2 Regulation 15 of the *Securities Brokers (Licensing and Operations) Regulations, 2016*, issued by the Securities and Exchange Commission of Pakistan (SECP), mandates brokers to establish internal policies and mechanisms that ensure the privacy of client and company-related information is upheld by all stakeholders, including directors, sponsors, and employees.

2. What Constitutes Confidential Business Information

2.1 Confidential business information refers to non-public, sensitive details that could negatively affect the company's competitiveness or operations if disclosed. Such information may include, but is not limited to:

- Non-public material information (Insider Information under the *Securities Act, 2015*)
- Intellectual property or proprietary processes
- Vendor and purchase details
- Operational workflows
- Client profiles and portfolios
- Financial records such as income sources, revenues, and expenditures

2.2 Unauthorized release of such information could hinder the organization's performance, damage relationships, or expose the company to legal and reputational risks.

3. Insider Information and Trading Restrictions

3.1 All insider information must be handled with utmost discretion. This includes any unpublished material information that may influence investor decisions or securities pricing. It also covers details conveyed by clients concerning their pending orders or trading strategies.

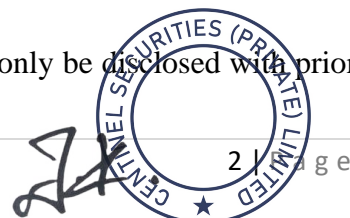
3.2 In line with SECP regulations, directors, sponsors, and staff must not engage in trading activities based on undisclosed material information, nor should they share such information with unauthorized individuals.

4. Data Confidentiality Standards

4.1 All non-public data obtained by the company must be treated as confidential and may not be shared with unauthorized persons either during or after an individual's tenure with the company, regardless of the reason for departure. Use of confidential data for personal gain, or to the detriment of the company, is strictly prohibited.

4.2 Every board member, senior executive, and employee is responsible for safeguarding sensitive information entrusted to them.

4.3 Confidential information belonging to clients, shareholders, or affiliated parties must only be disclosed with prior authorization by an appropriate company officer, and only when required under the law.



5. Transparency in Communication

- 5.1 All reports and communications—whether internal or external—must be clear, accurate, timely, and truthful.
- 5.2 These communications must comply with relevant legal and regulatory requirements.
- 5.3 Records of all client transactions and business activities must be maintained thoroughly and accurately.
- 5.4 Only officially designated representatives are permitted to issue statements on behalf of the company, especially when dealing with the media, investors, or regulators.

6. Responsible Use of Company Assets

Employees are expected to treat all company property and resources with care, ensuring they are used efficiently and appropriately for business purposes.

7. Policy on Dual Employment and Conflicts of Interest

- 7.1 Employees may not undertake external employment or business activities without prior written approval from the company.
- 7.2 Permission will generally not be granted if such outside activities interfere with job performance, create a conflict of interest, or contradict the company's values.
- 7.3 Non-Executive Directors are exempted from this clause subject to applicable laws and disclosure requirements. They must inform the company in advance if they intend to hold any other official position.
- 7.4 Employees must seek consent before acquiring significant interests in competing or partnering businesses.
- 7.5 No employee shall exploit the company's business opportunities for personal or third-party gain.

8. Anti-Corruption and Bribery

- 8.1 Employees are prohibited from accepting any form of gifts or incentives that could influence their decision-making unfairly.
- 8.2 No director or employee shall misuse their role to demand or receive illicit benefits.
- 8.3 Staff involved in negotiating contracts or working with external entities must ensure that partners comply with these anti-corruption principles.

9. Guidelines on Gifts and Entertainment

Only those gifts or hospitality offers that align with legal standards and company ethics, and do not damage the firm's integrity or reputation, may be accepted or offered.

10. Professional Conduct and Workplace Etiquette

All employees are expected to uphold professional standards, respect office decorum, and comply with the organization's internal code of conduct at all times.

Approved By:


Chief Executive Officer

