



Key elements of significant policies of AWT INVESTMENTS LIMITED

For the compliance of Code of Corporate Governance Regulation



Code of Conduct:

The Code of Conduct covers a wide range of business practices and procedures and applies to the officers / Employees in their conduct of the business and affairs of AWT Investments Limited (“The Company”). It has been adopted with the objectives of preventing wrongdoing and promoting honest and ethical conduct, full, fair, accurate, timely and understandable disclosure, compliance with applicable laws, rules and regulations, prompt internal reporting of violations of this Code, and accountability for adherence to this Code. This Code is intended as a code of Conduct as required by code of corporate governance issued by SECP and is specifically applicable to the Chief Executive officers, Chief Financial Officer, Key Heads (or persons performing similar functions, whether or not as officers or employees of the Company). Honesty at work is a necessary trait, and the Code of Business Conduct and Ethics sets out basic principles to guide the officers in discharging their duties for the Company. The Company policy prohibits harassment of any of its employees by anyone, including any supervisor, co-worker, vendor, client or customer.

Harassment is counter to the mission of the Company and a violation of Pakistan laws. The Company takes allegations of harassment seriously and responds promptly to complaints. Abuse and violence are also prohibited. The Company is a non-sectarian, apolitical, profit oriented business house working across Pakistan without regard to sectarian or political considerations. It is necessary for all employees, both individually and collectively, to abstain from any activity that may be perceived as aligning them or the Company for or against.



Whistle Blowing Policy:

The Whistle Blowing Policy is a process where an employee within the organization discloses to the co-workers or to those in authority, about any mismanagement, illegality, corruption, breach of trust or some other wrongdoing. It applies to all employees, including those designated as permanent, contractual, probation. Confidentiality and reporting in good faith are important aspects of the policy. Only genuine concerns should be reported, such as criminal offence, fraud and corruption, dissemination of organization's confidential information, unauthorized access or use of Organization's property, conduct which is an offence or a breach of law, failure to comply with a legal obligation, danger to the health and safety of any other employee, unauthorized use of funds, abuse of authority, sexual, physical or other abuse, and other unethical conduct. When any employee becomes aware of any suspected wrongdoing, one should notify the matter to the line manager or Head of the Department, Compliance Officer, HR authority, or Chief Executive Officer.

The Whistle Blowing Policy is a tool used by employees to report suspected wrongdoing. It includes an outline of the known or suspected wrongdoing, details of when and where it occurred, a list of names of those suspected of being involved, details of how the employee came to know about the suspected activities, the value of the loss to the company, breaches of internal controls, policy, procedure or other requirements, names of anyone with whom the incident has been discussed or reported to, name and contact details of the employee, and the date and time of making the report. Following speaking up, an employee will be acknowledged within 3 working days and may attend meetings as part of the process.



Risk Management:

Risk Management is the overall process of identifying and understanding the full spectrum of variable degrees and kinds of risk and taking informed actions to mitigate them. The Risk Management Department headed by the Head of Risk Management is responsible for identifying, evaluating or measuring significant risks inherent in the investment management as well as the business operations of the organization. The three major components of risk management process are: Identify/define risk, Risk Measurement and Risk Management. Identifying risk involves identifying the risks such as Market Risk, Credit Risk, Spread Risks, Liquidity Risk and Operational risk. Risk Measurement involves measuring the risk level and comparing it to the risk profile of the respective investments.

Risk Management involves a risk response which is of the following types: Avoidance-liquidation or no investment, Reduction through diversification and risk limits, sharing through hedging or insurance, and Acceptance-no action taken. AWT Investments seeks to reduce its exposure to risks that are not essential to its core business. To achieve this, the company has adapted its risk management policies and processes to reduce exposure to interest rate, currency, liquidity, counterparty, legal, Model and other operational risks. Additionally, AWT Investments has broadly classified integrated financial risks into different areas with respect to various functions and exposures created by the activities of its relevant departments.