

Sr. #	Type of Information	Required Documents	Required Clients
1	Individuals/Sole proprietorship	<ul style="list-style-type: none"> • Name and Father's Name <ul style="list-style-type: none"> • Address • Telephone Number(s) • Sources of Income • Nationality & NTN • Guardian name (if Applicable) 	<ul style="list-style-type: none"> • Copy of CNIC or passport or attested copy of B form in case of Minor <ul style="list-style-type: none"> • Detail of Business / Employment Proof • Zakat Exemption Certificate (If Applicable) • Guardian Certificate (If Applicable)
2	Partnership based entity	<ul style="list-style-type: none"> • Name of Partnership Entity <ul style="list-style-type: none"> • Names of Partners • Father's Name of Partners • Address of Partnership entity • Telephone Number(s) 	<ul style="list-style-type: none"> • Copy of CNIC/ passport of all Partners • Copy of CNIC of authorized signatories • List of Authorized signatories along with power of attorney <ul style="list-style-type: none"> • Resolution authorizing investments • Copy of latest financials of partnership
3	Companies (Institutional and Corporate)	<ul style="list-style-type: none"> • Name of Company & its Directors <ul style="list-style-type: none"> • Registered Address • Telephone number (s) <ul style="list-style-type: none"> • Contact persons • Nationality & NTN • Registered number & NTN 	<ul style="list-style-type: none"> • Copy of CNIC/ passport of all Directors • Audited Accounts of the company • Memorandum and Article of Association • Board Resolution authorizing investments • Certificate of Incorporation/ Commencement of Business • List of Authorized Signatories along with copy of CNICs and power attorney
4	Clubs, Societies And Associations	<ul style="list-style-type: none"> • Name of Club, Society or Association • Registered address of Club, Society or Association <ul style="list-style-type: none"> • Telephone number(s) • Contact persons 	<ul style="list-style-type: none"> • Board / Governing Body Resolution for investment • Certified copy of by laws/ rules and regulations <ul style="list-style-type: none"> • Copy of CNIC of Board's members • Certified copy of certificate of Registration • List of Authorized Signatories along with copy of CNICs and power attorney

			<ul style="list-style-type: none"> • Copy of latest financials
5	Trusts including, but not limited to, Provident Fund, Gratuity Fund, Pension Fund, mutual fund, etc.)	<ul style="list-style-type: none"> • Name of trust, Fund etc • Name of Trustee • Address of Trust/ Fund etc. • Telephone number(s) • Contact persons 	<ul style="list-style-type: none"> • Copy of CNIC of all Trustees • Certified copy of Trust Deed • Trustee / Governing body Resolution for investment • Copy of the latest financials of the Trust • List of Authorized Signatories along with copy of CNICs and power attorney
6	Executors and Administrators	<ul style="list-style-type: none"> • Name of Entity for Executor/Admin is appointed • Name of Executor/Administrator • Address of entity & tele numbers 	<ul style="list-style-type: none"> • Copy of CNIC of Executor/Administrator • Certified copy of the letter of Administration
7	Government Entities	<ul style="list-style-type: none"> • Name of government owned organization • Address of Government owned organization <ul style="list-style-type: none"> • Telephone numbers • Contact persons 	<ul style="list-style-type: none"> • A Special Resolution/ authority endorsed by the Ministry of Finance or Finance Department from concerned Government (Federal/Provincial/Local) clearly listing the persons/officers authorised to operate such account • List of Authorized Signatories • Copy of CNIC of authorized officer(s) • Resolution authorizing investment

Effective Implementation of KYC/CDD Policy

ZSL follows the regulations that the all receipts/payments above Rs 25,000/- are made through cross –cheques , bank drafts, pay orders or other crossed banking instruments. Where any cash is accepted from a customer in an exceptional circumstance only, it is immediately reported to the Exchange with clear reasons as to why the cash receipt was accepted by the broker.

Third party cheques shall be endorsed by the issuer for the account intended.

Any account which has been inactive for a period of more than one year will be marked as an “Inactive Account”. To re-activate the account, Reactivation form has to be submitted by the client or he has to send a request via e-mail using his old registered e-mail address. Only after necessary CDD/ KYC verification, the account is reactivated

Government account shall not be opened in the personal names of the Government Official(s)

KYC/CDD measures shall be enhanced for High Risk Customers

Dealing with any Politically Exposed Person or customers holding public or high profile position, relationship with them should be established and/ or maintained with the approval of Senior Management of ZSL, including if any existing customer becomes holder of any public office or high profile position

In case ZSL is not able to satisfactorily complete the required CDD/ KYC measures, account shall not be opened, business relationship shall not be established and business transaction shall not be carried out. Instead, reporting of suspicious transaction shall be considered. Similarly, relationship with existing customer shall be terminated and reporting of suspicious transactions be considered if CDD/ KYC is found unsatisfactory

ZSL shall have Enhanced Due Diligence (EDD) once a client has been categorized as High Risk. Any unusual transactions are reported in a Suspicious Transaction Report (STR).

Any exception (including suspicious transaction) identified in fulfilling the criteria/guidelines laid down in this policy shall be clearly indicated in writing and referred to the Chief Executive Officer (CEO) in order to decide future course of action.

ZSL realizes that CDD is not a one-time exercise at the time of opening an account only. We shall carry out On-going Due Diligence. We shall be vigilant at all times and keep monitoring transactions of all clients.

Client Verification

- Before Account opening, ZSL shall send the client’s CNIC copy to NCCPL and CDC for verification.
- Account shall be opened once verification is complete.

Risk Assessment of Client

ZSL shall conduct Enhanced Customers Due Diligence if the client falls within the definition of High Risk Clients, which are defined as under:

- Non-resident clients
- Legal persons or arrangements including non-governmental organizations(NGOs) / Not for profit organizations (NPOs) and Trusts/charities
- Client with links to offshore tax havens

- High net worth clients with no clearly identifiable source of income
- Clients dealing in high-value items
- Clients whose businesses present a higher risk of money laundering such as cash based business
- Non-face-to-face/On-line clients
- Politically Exposed Persons (PEPs). Those individuals who are or who have been entrusted with prominent public functions in a country or territory, for example heads of state or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned entities, important political party officials but not middle ranking or more junior individuals in these categories
- Clients from or in countries where KYC/CDD and anti-money laundering Regulations are lax and are not sufficiently applying Financial Action Task Force (FATF) recommendations
- Clients who have been refused services by another financial institution (based on reasonable information);
- Establishing business relationship or transactions with counterparts from or in countries not sufficiently applying FATF recommendations.

For **Low Risk Clients**, ZSL shall apply **Simplified or Reduced KYC/CDD** measures. A client may be considered Low Risk if his identity and that of the beneficial owner are publicly known or where adequate checks and controls exist.

Following cases may be considered as Low Risk Clients for application of simplified or reduced CDD/ KYC:

- Financial institutions provided they are subject to requirements to combat money laundering and terrorist financing and are supervised for compliance with those requirements.
- Public listed companies that are subject to regulatory disclosure requirements.
- Government administrations or enterprises.

Compliance Function

ZSL shall monitor customers' transactions and report any suspicious activity in a timely manner. For compliance function, we have suitable human resource and IT reporting capability.

Updating Records/Record Retention

- As KYC/CDD is an ongoing process, ZSL continuously update clients' records. Any update on information of a client for KYC purpose shall be done through an updating form provided for this purpose. This shall only be accepted after verification of the client's signature or his request received via an e-mail from his old registered e-mail address.
- Six months before the expiry of any client's CNIC, our IT system shall generate an alert. ZSL shall then send an e-mail to the concerned client to submit a copy of his renewed CNIC.
- ZSL shall keep record of client's identity, account files and correspondence exchanged with the client for at least ten years.

Training and Employee Screening

- ZSL shall have an on-going employee training program to ensure that all employees understand and perform their duties in accordance with the guidelines provided by the SECP regarding Know Your Client/Customer Due Diligence and Anti-Money Laundering.
- ZSL shall employ effective screening procedures while hiring employees to ensure high standards of professionalism and integrity. Also, screening shall be an on-going process.