

Alignment of Interest of Policy

The policy has been developed to align the interests of its key employees i.e. (Chief Executive Officer and Chief Investment Officer) with those of the unit holders of the Collective Investment Schemes (CIS) managed by the Atlas Asset Management Limited (AAML). The policy is developed in accordance with the direction of Securities and Exchange Commission of Pakistan (SECP) via NBFC Regulation, 2008 as amended from time to time.

The following are the requirements for alignment of interest of key employees with the unitholders of CIS/Mutual Funds managed by AAML:

- i. Twenty percent of the bonus paid (net of income tax) to the key employees will be in the form of units of CIS (open for subscription at the time of disbursement of such bonuses).
- ii. To align the interest of key employees, twenty percent of the bonus paid (net of taxes) will be equally invested in CIS managed by AAML. Chief Financial Officer will ensure allocation and investment of bonus amount in units of CIS in accordance with the Policy.
- iii. AAML will disclose such bonus paid to the key employees in the form of units of each scheme in aggregate along with the scheme return in respective annual accounts.
- iv. The lock-in period for the units allocated to the key employees during which, no redemption of such units can be made is sixteen months.
- v. AAML reserves the right to forfeit/claw back the units of Key Employees, in case of fraud, gross negligence, mis-selling or deceptive conduct on their part. The Process for determining fraud, theft, misappropriation, mis-selling or deceptive conduct, breach of code of conduct will be handled in accordance with the company's disciplinary action and code of conduct. Prevention in implementation of moral hazard will be dealt in accordance with the respective company policy.
- vi. All AAML employees are required to ensure compliance with AAML code of conduct.
- vii. The Chief Compliance Officer will be responsible for compliance. He would ensure that adequate record with applicable requirements shall be generated and retained.
- viii. The AMC will disclose the formulated policy along with summary of any exemption to the policy on its website and annual report.