



Communication and Disclosure Policy

1. What does this policy cover and who is covered?

This policy explains your responsibilities when you communicate through any media, both on our business premises and in your own time. It confirms that **Topline Securities Limited** ["**Topline**"] may monitor your use of any communication media. Monitoring is required to protect the business interest and reputation of Topline.

Failure to comply with this policy may lead to action being taken by **Topline** against you, which in the case of serious breaches, may result in your dismissal from the business on grounds of gross misconduct.

Serious breach may include e.g. any communications which: (i) cause harm to the reputation of Topline (ii) disclose of Topline's confidential information or trade secrets, (iii) infringe any copyright and other IP (iv) are unlawful and discriminatory in nature.

We may require you to remove any communication or other postings which you publish or place in breach of this policy. If you refuse or fail to do so, this will be treated by us as a serious disciplinary matter.

You may also face legal proceedings from **Topline** and potentially affected third parties as well, if your communication and media postings causes harm to our business or to its reputation, is offensive or derogatory or discloses confidential information, and/or to other named individuals whose reputations are damaged by your actions.

You should contact **Internal Auditor** if you find anything posted that breaches this policy or otherwise brings **Topline** into disrepute along with the screenshot or other evidence. Identity of the person reporting will remain confidential.

2. Who does it apply to?

This policy is applicable on any person under an existing employment contract with Topline, including those working for Topline as full and part-time employees and trainees or on a contract of probation.

3. It is not part of your employment contract

This policy is not part of your employment contract. Any amendment of this policy is at the sole discretion of Topline and shall be done without the need for any prior consent from the employees. Employees will be notified through written notice of any amendments made.

4. Your Media and communication obligations and responsibilities

It is your duty to protect **Topline's** interests. This means, for example, (but not exhaustively) that:

- a) You must not publish anything that could directly or indirectly damage Topline's interests or that might compromise our reputation
- b) If you are ever unsure about the appropriateness of a publication, whether it complies with this policy and/or whether it is necessary, you should seek prior views and approval to publish from Internal Audit before taking any further action, and absolutely before posting that content.
- c) Unless you have been specifically authorised to do so, and the content of your communication has been approved by Management, you must not speak on behalf of Topline or indeed, on behalf of any other person within our business or connected with it.
- d) Social media is generally a public resource – and one where posts can be freely and rapidly shared, often without material moderation, control or constraint. You should assume that anything you publish anywhere will sooner or later reach the public domain. When you share content posted by others, remember that you may be seen as giving tacit approval to opinions that could bring the Company into disrepute.
- e) Always respect copyright, and always check whether or not a third party's content is provided before you reuse or repost it.
- f) Anything you post must be accurate and lawful.
- g) You must not publish any of **Topline's** trading secrets and confidential information. This includes not posting anything that relates, for example (and non-exhaustively), to any of the following:
 - unpublished details of **Topline's** current or future performance
 - information of any description that is clearly intended for internal use only
 - Anything else that is not already in the public domain (and not as a result of you having unlawfully leaked or disclosed it)
- h) It must be clear at all times that unless (with prior permission from Management to do so), you are posting on behalf of our business and for the purpose of relating our business' position on something specific, any opinions you express are your own and that you are not speaking on **Topline's** behalf.
- i) You are personally responsible for your own social media and other modes of communication and any and all content that may be posted on or linked to them.
- j) We also insist that you never use our logo, trademark, or other corporate artwork in anything you post or as part of any of your social media profiles, unless you have our express consent to do so, in advance of any publication.
- k) You remain at all times a representative of and ambassador for our business. This means that you must ensure your profiles and postings are at all times appropriate and not in any way at risk of bringing our business into disrepute or any controversy. Even if you do not name us as your employer, people who know you and where you work may still make an unwelcome association with Topline if your social media activity is unprofessional and/or damaging to us.

- l) Many people use social media and other sources of communication in a personal capacity to have a rant. Take care when engaging in any such public outbursts that you are not damaging both your personal and our business reputations for professionalism and moderation. Do not criticise Topline or any other business or individual (including our suppliers, clients, business associates or your colleagues).
- m) Be respectful of others when using social media and other sources of communication. Just as in the workplace and during working hours, where we do not tolerate bullying or harassment and unfair discrimination on any grounds, we also do not tolerate it on social media either. You must not engage in activities that are immoral or considered unprofessional. Some examples may include:
- Making unlawful or disrespectful comments
 - Using abusive or threatening language
 - Posting sexually explicit language or images
 - Publishing false or misleading statements
 - Trolling (starting or pursuing arguments in an online community with the intention of disrupting normal discussions within that community)
 - Impersonating your colleagues or third parties
 - Inciting somebody to commit a crime
- n) Be respectful of our business also. We will not tolerate the airing of grievances about our business or any of its activities on social media. If you want to make a complaint, you should use our internal process
- o) Before posting any photographs or videos which contain your colleagues and/or other people, you must first obtain the express consent of those persons to be included in the photos and/or videos being posted. Do not publish or post such items without the aforesaid consent being obtained. Consent to the posting of any photographic or videographic images containing colleagues and/or other people must have the express consent of those persons to be a part of this posting. Do not publish without this consent.
- p) Do not publish any other images where you have not first acquired any and all permissions (including copyright) to do so.

Do not publish any person's personal details unless you have their express consent to do so (as well as the consent of Management, if applicable), and this is strictly necessary for the legitimate business objective underpinning the posting. Personal details may include Any information that relates directly or indirectly to a person, who is identified or identifiable from such information. This includes, but is not limited to name, address, date of birth, ethnicity, religion, and CNIC number.