



**FCIL**

**FIRST CAPITAL INVESTMENTS LIMITED**

**ALIGNMENT OF INTEREST OF  
KEY EMPLOYEES**

## **First Capital Investments Limited (“FCIL” or “the Company”)**

### **Alignment of Interest of Chief Executive Officer, Chief Investment Officer, and Head of Investment Committee with Unit holders of CIS**

#### **Objective and Applicability**

The purpose of policy is to comply SRO 592(I)/2023 dated 17 May 2023 issued from the Securities and Exchange Commission of Pakistan (SECP) whereby regulation 60A added with Non-Banking Finance Companies and Notified Entities Regulations, 2008.

In order to align the interest of key employees of FCIL the management of FCIL shall comply the following guidelines in compensating key employees;

- In case a Bonus is paid to the aforementioned Key Employees, 100% of total bonus assigned by Company shall be in the form of units of First Capital Mutual Fund (“FCMF”);
- The bonus Units shall be transferred in the names of key employees in electronic form;
- The minimum lock-in period shall be 1 year if the employee serves. Further, after retirement/resignation/termination minimum lock-in period shall be 2 months;
- Units given as bonuses to Key Employees shall be frozen, in case of fraud, gross negligence, miss-selling, or deception on the part of the key employees comprising of portion of compensation to be forfeited. The process for determining the fraud, gross negligence, miss-selling, and/or deceptive conduct by the aforementioned key employees will be conducted according to Policies, framed time to time;
- The Company shall disclose of such bonus paid to the Key Employees in the form of units of FCMF in aggregate along with the scheme return in respective annual accounts.;
- The Company shall maintain the data as per retention policy for adequate audit trail and record to verify compliance with applicable requirements;
- The Company shall disclose the formulated policy along with a summary of any exemption to the policy on its website and annual report