



MMC STOCKBROKERS PRIVATE LIMITED

CLIENT PROTECTION PRINCIPLES & PROFESSIONAL CONDUCT POLICY



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1. Purpose

This policy establishes a clear framework for protecting client rights and promoting ethical, professional conduct across all operations. It reinforces our commitment to transparency, fairness, and regulatory compliance in line with the Securities and Exchange Commission of Zimbabwe (SECZim) and Zimbabwe Stock Exchange (ZSE) standards.

2. Scope

This policy applies to all employees and clients of MMC Stockbrokers Private Limited, covering all stockbroking services including trading, advisory, settlement, and client engagement.

3. Minimum Client Protection Principles

A. Right to Transparent Information

Clients shall receive clear, accurate, and timely information regarding products, fees, risks, and performance. All communications must be honest and not misleading.

B. Right to Fair Treatment

Clients must be treated equitably, without bias or discrimination. Conflicts of interest must be disclosed and managed appropriately.

C. Right to Privacy & Data Protection

Client data shall be handled with strict confidentiality and in accordance with applicable data protection laws. No personal information shall be shared without consent, unless required by law.



D. Right to Redress

Clients have access to a formal complaint resolution mechanism. Complaints must be acknowledged within 2 working hours and resolved within 2 working days.

E. Right to Informed Consent

Clients must be given sufficient information and time to make informed decisions. No transaction shall be executed without explicit client authorization.

4. Client Responsibilities

- Provide accurate and complete personal and financial information
- Understand the risks associated with investment products
- Review account statements and transaction records regularly
- Promptly report discrepancies or concerns
- Comply with KYC and AML requirements

5. Professional Code of Conduct for Staff

A. Integrity & Ethics

Act honestly, transparently, and in the best interest of clients. Avoid conflicts of interest and disclose any potential bias.

B. Confidentiality

Maintain strict confidentiality of client information. Do not misuse or disclose sensitive data.



C. Competence & Diligence

Maintain professional knowledge and skills relevant to your role. Execute duties with care, accuracy, and timeliness.

D. Accountability

Take responsibility for actions and decisions. Cooperate fully with internal audits and regulatory reviews.

E. Respect & Professionalism

Treat clients and colleagues with courtesy and respect. Avoid discriminatory, abusive, or unethical behaviour.

6. Confidentiality & Non-Retaliation

All complaints and client interactions shall be treated with strict confidentiality. Information will only be shared with individuals directly involved in resolution. Retaliation against clients or staff who raise or participate in complaints is strictly prohibited and may result in disciplinary action.

7. Enforcement & Disciplinary Action

Violations of this policy may result in disciplinary measures, including warnings, suspension, or termination. Serious breaches may be reported to regulatory authorities.

8. Continuous Improvement

- Regular staff training on ethics, compliance, and client engagement
- Periodic review of client feedback and complaint trends
- Annual policy updates to reflect regulatory changes and best practices



9. Policy Review

This policy shall be reviewed annually or as required to ensure continued relevance and alignment with regulatory standards.

Approved by:

MMC Stockbrokers Private Limited

Executive Director

E. Mapokotera

Compliance Officer

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Date

December 2025