



**POLICY FOR ALIGNMENT OF
INTEREST**

INTRODUCTION AND OBJECTIVE OF POLICY:

This document is prepared in pursuance to the requirements of Regulation 60A of NBFC Regulations, 2008 recently notified by SECP vide SRO 592(I)/2023 which specifies the AMC to devise a policy to align the interest of its key employees with the unitholders of Collective Investment Schemes (CISs) being managed by the AMC.

APPLICATION OF POLICY:

This policy shall be applicable on the key employees of National Investment Trust Limited (NITL) which are part of investment committees of CISs being managed by NITL.

GUIDELINES:

To align the interest of key employees, fifteen percent of the bonus payable (net of income tax) shall be in the form of units of CISs being managed by NITL, open for subscription at the time of disbursement of bonus, in which they have a role.

Investment in units of CISs will be made in equal proportion on the date of disbursement of performance bonus.

Finance Department will ensure allocation and investment of bonus amount in the units of CISs in accordance with the policy.

The lock-in period for such units allocated to the key employees will be twelve months. However, the employees may redeem the allocated units prior to expiry of lock in period in case of retirement on attaining the superannuation age/ resignation/ completion of contract without renewal.

Forfeiture/ claw back of such units of key employees, in case of fraud, gross negligence, mis-selling or deceptive conduct shall be dealt with as per the company's HR manual.

DISCLOSURE REQUIREMENT:

Bonus paid to the key employees in the form of units of each scheme in aggregate along with the scheme return shall be disclosed in the respective annual accounts.

The approved formulated policy along with summary of any exemption to the policy shall be disclosed on NITL website and annual report.

RETENTION OF RECORDS:

The Compliance Department shall retain complete record of information for a period of ten years. The submitted record will not be shared with anyone except as required under the Regulatory Framework.

REVIEW AND AMENDMENTS TO THIS POLICY:

This policy may be reviewed and amended from time to time with the approval of Board. Reviewed and amended policy will be notified to the employees through Office Order/ Circular.