

786 INVESTMENTS LIMITED

MARKETING POLICY

1. PURPOSE

The purpose of this **Marketing Policy** is to establish a clear, ethical, transparent and regulatory-compliant framework for all marketing and promotional activities undertaken by **786 Investments Limited** (the “Company”), an Asset Management Company (“AMC”).

The Policy aims to ensure that marketing activities:

- promote the Company's products and services responsibly;
 - provide investors with **clear, accurate and balanced information**;
 - protect investors from misleading or exaggerated claims;
 - comply with applicable SECP and other regulatory requirements;
 - support sustainable business growth and the Company's reputation;
 - maintain consistency in all marketing communications; and
 - preserve the integrity, independence and professionalism expected of an AMC.
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2. SCOPE

This Policy applies to all marketing, advertising, promotional and investor-education activities of the Company, including:

- Collective Investment Schemes (“CIS”) and Investment Plans;
- mutual funds and other investment products managed by the Company;
- digital and social media campaigns;
- website content;
- brochures, presentations and advertisements;
- investor seminars and events;
- email and SMS campaigns;
- telemarketing and direct marketing;
- distributor/channel marketing;
- public relations and media communications; and
- any third party engaged to undertake marketing on behalf of the Company.

The Policy applies to all employees, management, Directors and external agencies acting on behalf of the Company.

3. REGULATORY COMPLIANCE

All marketing activities shall comply with applicable:

- Companies Act, 2017;
- SECP laws, regulations, circulars, directions and guidelines applicable to AMCs and CISs;
- applicable requirements relating to advertisements, offering documents, Key Fact Statements (“KFS”), Fund Manager Reports (“FMRs”) and investor disclosures;
- AML/CFT requirements;
- consumer/investor protection requirements;
- applicable securities and capital-market laws; and
- the Company's internal policies and Code of Conduct.

Where this Policy conflicts with applicable law or regulatory requirements, the law or regulatory requirement shall prevail.

4. CORE MARKETING PRINCIPLES

All marketing activities shall be based on the following principles:

4.1 Accuracy

All information must be factually correct, verifiable and not misleading.

4.2 Fairness and Balance

Marketing shall present benefits and material risks fairly and shall not emphasize potential returns while obscuring relevant risks.

4.3 Transparency

Fees, charges, material conditions, eligibility criteria and relevant limitations shall be disclosed where required.

4.4 Investor Protection

Marketing shall facilitate informed investment decisions rather than encourage inappropriate or speculative investment behavior.

4.5 Professionalism

All marketing shall uphold the Company's reputation, integrity and fiduciary responsibilities.

4.6 Consistency

Marketing information shall be consistent with approved fund documents, KFS, offering documents, FMRs and regulatory disclosures.

4.7 No Misrepresentation

The Company shall not make false, exaggerated, unsubstantiated or deceptive claims.

5. PRODUCT MARKETING

Marketing of any fund or investment product shall be based on its approved documentation and shall accurately represent:

- investment objective;
- investment strategy;
- fund structure;
- risk profile;
- benchmark, where applicable;
- minimum investment;
- applicable fees and charges;
- subscription and redemption terms;
- investment horizon, where relevant;
- eligibility requirements; and
- material terms and conditions.

No marketing material shall introduce terms or representations inconsistent with the approved product documentation.

6. PERFORMANCE ADVERTISING

Where historical or current investment performance is communicated:

- the relevant period shall be clearly stated;
- performance figures shall be accurate and verifiable;
- the applicable benchmark shall be identified where relevant;
- the basis of calculation shall be appropriate;
- required disclaimers shall be included;
- performance shall not be presented as guaranteed; and

- past performance shall not be represented as an indication or assurance of future performance.

Cherry-picking only favorable performance periods or selectively presenting performance in a misleading manner is prohibited.

7. RETURNS AND GUARANTEES

The Company shall **not guarantee or imply guaranteed investment returns** unless expressly permitted by applicable law and supported by an appropriate legal/regulatory basis.

Marketing material shall clearly communicate that investment values and returns may fluctuate and that investors may incur losses, where applicable.

Statements such as:

- “risk-free investment”;
- “guaranteed profit”;
- “assured return”; or
- similar claims

shall not be used unless specifically permitted and appropriately substantiated.

8. RISK DISCLOSURE

Marketing communications shall include appropriate risk disclosures proportionate to the product and communication medium.

Relevant risks may include:

- market risk;
- interest-rate risk;
- credit/default risk;
- liquidity risk;
- currency risk;
- concentration risk;
- operational risk;
- regulatory risk; and
- risk of loss of principal.

Risk disclosures shall be presented in a manner that is understandable and not deliberately obscured by promotional content.

9. KEY FACT STATEMENT AND APPROVED MATERIAL

Where applicable, marketing material shall be consistent with the relevant **Key Fact Statement (KFS)** and other approved fund documentation.

The Company shall maintain a controlled repository of approved:

- KFSs;
- offering documents;
- fund profiles;
- performance data;
- FMRs;
- brochures;
- presentations;
- advertisements; and
- standard disclaimers.

Employees and distributors shall use only the latest approved versions.

10. DIGITAL AND SOCIAL MEDIA MARKETING

The Company may use:

- website;
- social media;
- email;
- digital advertising;
- mobile applications;
- investor portals;
- webinars; and
- other digital channels

for marketing and investor education.

Digital marketing shall comply with the same standards applicable to traditional marketing.

Employees shall not publish Company or fund-related promotional content through personal accounts unless specifically authorized.

11. INVESTOR EDUCATION

The Company may conduct investor education and awareness initiatives covering:

- mutual funds;
- investment principles;
- diversification;
- risk and return;
- financial planning;
- product features;
- fees and charges; and
- investor rights and responsibilities.

Investor education material shall be factual and balanced and shall not be disguised product promotion.

12. MARKETING THROUGH DISTRIBUTORS AND THIRD PARTIES

Where products are marketed through distributors, agents, consultants or other third parties:

- only approved and authorized parties may represent the Company;
- marketing material shall be pre-approved;
- third parties shall comply with applicable regulatory requirements;
- unauthorized modifications to marketing material shall be prohibited;
- misleading claims or representations shall be prohibited; and
- the Company shall maintain appropriate oversight of third-party marketing activities.

Material violations may result in suspension or termination of the relevant arrangement.

13. CUSTOMER SEGMENTATION AND SUITABILITY

Marketing initiatives may be targeted to appropriate investor segments based on:

- investment objectives;
- risk characteristics;
- product features;
- investor needs; and
- applicable eligibility requirements.

Marketing shall not deliberately target investors with products that are clearly inconsistent with the nature or risk profile of the product.

14. CONFLICTS OF INTEREST

Employees involved in marketing shall disclose and appropriately manage conflicts of interest.

Marketing decisions shall not be influenced improperly by:

- personal financial interests;
 - commissions or incentives;
 - relationships with distributors;
 - relationships with investors;
 - related parties; or
 - other personal or commercial considerations.
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15. GIFTS, INCENTIVES AND PROMOTIONAL BENEFITS

Any promotional incentive, campaign, gift, reward or benefit offered to investors or distributors shall:

- be properly approved;
- comply with applicable law and regulations;
- have clearly defined eligibility and terms;
- be transparently communicated; and
- not be structured to mislead investors or improperly influence investment decisions.

No employee shall offer or accept an improper benefit in connection with marketing activities.

16. APPROVAL AND CONTROL OF MARKETING MATERIAL

All external marketing material shall undergo an appropriate review and approval process before publication.

Depending on the nature of the material, review may include:

Marketing → Product/Investment Function → Compliance → Management Approval

The review shall verify:

- factual accuracy;
 - regulatory compliance;
 - consistency with approved product documents;
 - performance data;
 - risk disclosures;
 - fees and charges;
 - branding; and
 - applicable disclaimers.
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17. RECORD KEEPING

The Company shall maintain appropriate records of marketing activities, including:

- final approved marketing material;
- approval evidence;
- supporting performance data;
- campaign details;
- third-party marketing arrangements;
- investor communications; and
- material amendments.

Records shall be retained in accordance with applicable legal, regulatory and Company requirements.

18. MARKETING BUDGET AND CONTROL

Marketing expenditure shall:

- be included in the approved budget wherever practicable;
- be incurred only with appropriate authorization;
- provide reasonable value for money; and
- comply with the Company's Procurement Policy and Delegation of Authority.

Unbudgeted material marketing expenditure shall require appropriate approval.

19. MONITORING AND COMPLIANCE

The Company shall periodically monitor marketing activities to ensure compliance with this Policy.

Compliance monitoring may include review of:

- advertisements;
- social media;
- distributor communications;
- investor presentations;
- performance claims;
- product descriptions; and
- promotional campaigns.

Any material breach shall be escalated to senior management and/or the Board or relevant Board Committee, as appropriate.

20. COMPLAINTS AND CORRECTIVE ACTION

Marketing-related investor complaints shall be recorded and investigated promptly.

Where inaccurate or misleading information is identified, the Company shall take appropriate corrective action, which may include:

- correction or withdrawal of the material;
 - notification to affected stakeholders where appropriate;
 - corrective communication;
 - suspension of the campaign; and
 - disciplinary or contractual action where warranted.
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21. RESPONSIBILITIES

Board of Directors

The Board shall:

- approve this Policy;
- provide oversight of the Company's marketing framework; and
- ensure marketing activities support responsible business and investor protection.

Chief Executive Officer

The CEO shall:

- oversee implementation;
- approve major marketing initiatives; and
- ensure appropriate resources and controls.

Marketing Function

Marketing shall:

- develop campaigns;
- ensure brand consistency;
- use only approved product information;
- coordinate required reviews; and
- maintain marketing records.

Compliance Function

Compliance shall:

- review marketing material for regulatory compliance;
- monitor regulatory requirements;
- review material risk/disclosure issues; and
- escalate significant breaches.

Investment/Product Function

The relevant Investment/Product function shall verify:

- investment information;
- fund characteristics;
- performance data;
- benchmarks; and
- investment-related representations.

All Employees

Employees shall:

- comply with this Policy;
- use approved material;
- protect confidential information;
- avoid misleading statements; and
- report suspected violations.

22. PROHIBITED MARKETING PRACTICES

The following are strictly prohibited:

1. Misleading or false statements.
2. Unsubstantiated claims of superiority.
3. Guaranteed-return claims without legal/regulatory basis.
4. Concealing or minimizing material risks.
5. Manipulating or selectively presenting performance.
6. Using outdated or unauthorized product information.
7. Unauthorized modification of approved marketing material.
8. Misuse of investor or customer information.
9. Unauthorized investment advice.
10. False testimonials or endorsements.
11. Marketing that violates applicable regulatory requirements.
12. Any marketing activity intended to circumvent investor-protection requirements.

23. REVIEW OF POLICY

This Policy shall be reviewed **at least annually** or earlier where required due to:

- changes in SECP regulations;
- changes in the Company's products;
- material compliance findings;
- changes in marketing practices or technology; or
- other significant regulatory or business developments.

Any material amendment shall be submitted to the Board for approval.

24. EFFECTIVE DATE

This Policy shall become effective from the date of approval by the Board of Directors of **786 Investments Limited** and shall remain in force until amended, replaced or withdrawn.

ANNEXURE – MARKETING APPROVAL MATRIX

Marketing Material	Marketing	Product/Investment	Compliance	Final Approval
General Corporate Material	✓	—	✓	Authorized Management
Fund Brochure/Profile	✓	✓	✓	CEO/Authorized Officer
Performance Advertisement	✓	✓	✓	CEO/Authorized Officer
KFS/Product Material	✓	✓	✓	Authorized Management
Investor Presentation	✓	✓	✓	Authorized Management
Social Media Campaign	✓	As applicable	✓	Designated Officer
Major Campaign	✓	✓	✓	CEO
Regulatory/Material Announcement	✓	✓	✓	CEO/Company Secretary

Approval Date: April 09, 2026