



Chinese Wall Policy

Objective

To prevent the misuse of confidential information and to ensure compliance with regulatory requirements, KLFS has implemented a "Chinese Wall" policy. This policy is designed to separate areas that have access to confidential information (referred to as "inside areas") from departments involved in sales, marketing, investment advice, or other support services (referred to as "public areas").

Scope

This policy applies to all employees, contractors, and consultants of KLFS who may have access to confidential information.

Definition of Inside Areas and Public Areas

Inside Areas: Departments or teams that have access to confidential information, including but not limited to, research and analysis, legal, compliance, and other functions handling sensitive data.

Public Areas: Departments or teams involved in sales, marketing, investment advice, client services, and other support services that do not require access to confidential information.

Separation of Areas

Physical and logical separation will be maintained between inside areas and public areas. Employees in inside areas will be restricted from sharing confidential information with employees in public areas.

Access controls, such as restricted access to certain databases and information systems, will be implemented to ensure that only authorized personnel in inside areas can access confidential information.

Access and Sharing Restrictions

Employees in inside areas are prohibited from disclosing confidential information to employees in public areas.

Any sharing of confidential information must be approved by the compliance officer and must follow strict protocols to ensure the information remains secure.

Training and Awareness

Regular training sessions will be conducted for employees to ensure they understand the importance of the Chinese Wall policy and the procedures to follow.

Employees will be required to acknowledge their understanding of the policy and their commitment to comply with it.



Monitoring and Enforcement

The compliance officer will monitor adherence to the Chinese Wall policy and will conduct periodic audits to ensure compliance.

Any violations of this policy will be subject to disciplinary action, up to and including termination of employment.

Reporting

Employees are encouraged to report any suspected breaches of the Chinese Wall policy to the compliance officer or through the anonymous reporting mechanism.

Review

This policy will be reviewed annually or as required to ensure its effectiveness and compliance with regulatory requirements.