

**UEXO GLOBAL MARKETS LLC**

Business Activity:

**Securities & Financial Products Promotion  
Introduction to Financial Services**

**Business Continuity & Disaster Recovery Policy**

**Business Continuity & Disaster Recovery Policy**

Log of preparation, version of Policy & approval date.

| Sr. No | Document Version   | Document Release Date | Prepared By   | Approved By   |
|--------|--------------------|-----------------------|---|---|
| 1      | General Update v.1 | Dec.2025              | Compliance Manager<br>Shan Muhammed Hussian<br><br>Category Manager<br><br>Louis DeTata | <b>Louis Detata</b><br><br>Owner & CEO<br>Signature |

Company Stamp



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## **INTRODUCTION**

We at **UEXO GLOBAL MARKETS L.L.C** with commercial license Number **1569040** issued by Dubai Economy & Tourism are confirming that we are seeking approval from the SCA to approve our Category 5 SCA application with reference number LIC-0011290 as arranging and advising with activities Promotion & Introduction that we are involved in with the SCA.

### **1.1-How to use this plan?**

In the event of a disaster which interferes with UEXO's ability to conduct business from its office, this plan is to be used by the responsible individuals to coordinate the business recovery of the company's operations. The plan is designed to contain, or provide reference to, all of the information that might be needed at the time of a business recovery.

Index of Terms: (EOC) Emergency Operations Center – (ERT) Emergency Response Team  
– (BCP) Business Continuity Plan – (IT) Information Technology.

Section I, Introduction, contains general statements about the organization of the plan. It also establishes responsibilities for the testing (exercising), training, and maintenance activities that are necessary to guarantee the ongoing viability of the plan.

Section II, Recovery Teams, lists the Recovery Team functions, those individuals who are assigned specific responsibilities, and procedures on how each of the team members is to be notified.

Section III, Team Procedures, determines what activities and tasks are to be taken, in what order, and by whom to affect the recovery.

This document is a binding document for UEXO and its Governing Body and employees.

### **1.2-Objectives**

The objective of the Business Continuity Plan is to coordinate recovery of critical business functions in managing and supporting the business recovery in the event of facilities (office building) disruption or disaster. This can include short or long-term disasters or other disruptions, such as fires, floods, earthquakes, explosions, terrorism, tornadoes, extended power interruptions, hazardous chemical spills, and other natural, man-made disasters, or global pandemics.

A disaster is defined as any event that renders a business facility inoperable or unusable so that it interferes with the organization's ability to deliver essential business services.

The priorities in a disaster situation are to:

- Ensure the safety of employees and visitors in the office buildings (Responsibility of the ERT- ERT's safety experts manage).
- Employee and Critical Service Provider Communication.

- Mitigate threats or limit the damage that threats can cause. (Responsibility of the ERT)
- Have advanced preparations to ensure that critical business functions can continue.
- Functionality of the remote working location.
- Recovery of systems application and data.
- Recovery and retention of hard copy of documents.

### **1.3-Scope**

The Business Continuity Plan is limited in scope to recovery and business continuance from a serious disruption in activities due to the non-availability of UEXO's facilities. The Business Continuity Plan includes procedures for all phases of recovery as defined in the Business Continuity Strategy of this document. Unless otherwise modified, this plan does not address temporary interruptions of duration less than the time frames determined to be critical to business operations.

The scope of this plan is focused on localized disasters such as fires, floods, disease outbreak, and other localized natural or man-made disasters. This plan is not intended to cover major regional or national disasters such as regional earthquakes, war, or nuclear disasters.

However, it can provide some guidance in the event of such a large-scale disaster.

### **1.4- Assumption**

The viability of this Business Continuity Plan is based on the following assumptions:

- 1- That a viable and tested IT Disaster Recovery Plan will be put into operation to restore data center service at a backup site within two to five days.
- 2- UEXO's Emergency Response Team has identified available space for relocation of departments which can be occupied and used normally within one to three days of a facilities emergency.
- 3- That this plan has been properly maintained and updated as required.

The functions and roles mentioned in this plan do not have to previously exist within an organization; they can be assigned to one or more individuals as new responsibilities, or delegated to an external third party if funding for such services can be arranged and allocated.

### **1.5-Plan Testing Procedures and Responsibilities**

The Business Continuity Coordinator is responsible for ensuring the workability of the Business Continuity Plan. This should be periodically verified by active or passive testing.

### **1.6-Plan Training Procedures and Responsibilities.**

The Board of Directors is responsible for ensuring that the personnel who carry out the Business Continuity Plan are sufficiently aware of the plan's details. This may be accomplished in a few ways including practice exercises, participation in tests, and awareness programs conducted by the Business Continuity Coordinator

## 2- Business Continuity Strategy

### Introduction

This section of the Business Continuity Plan describes the strategy devised to maintain business continuity in the event of a facilities disruption. This strategy would be invoked should UEXO's primary facility somehow be damaged inaccessible.

### 2.1- Business Function Recovery Priorities

The strategy is to recover critical business functions at the alternate site location. This can be possible if an offsite strategy has been put into effect by Office Services and Disaster Recovery/IT Teams to provide the recovery service. Information Systems will recover IT functions based on the critical departmental business functions and defined strategies.

### 2.2- Relocation Strategy and Alternate Business Site

In the event of a disaster or disruption to the office facilities, the strategy is to recover operations by relocating to an alternate business site. The short-term strategies (for disruptions lasting two weeks or less), which have been selected, include

| Primary Location                      | Alternate Business Site |
|---------------------------------------|-------------------------|
| OFFICE ---- LEVEL ---, -----<br>DUBAI | Work From Home (WFH)    |

For long-term disruptions (i.e. major building destruction, etc.), the strategy will be to acquire/lease and equip a new office space in another building.

However, in an event of a disease outbreak such as Covid-19 pandemic, where people must socially distance themselves and not to come into contact with other people, the strategy will be to follow the Government's guidelines and advise employees to work from home until the Government releases further instructions on the work policy.

### 2.3- Recovery Plan Phases

The activities necessary to recover from an UEXO facility disaster or disruption will be divided into four phases. These phases will follow each other sequentially in time.

#### Disaster Occurrence

This phase begins with the occurrence of the disaster event and continues until a decision is made to activate the recovery plans. The major activities that take place in this phase includes: emergency response measures, notification of management, damage assessment activities, and declaration of the disaster.

#### Plan Activation

In this phase, the Business Continuity Plans are put into effect. This phase continues until the alternate facility is occupied, critical business functions reestablished, and computer system service restored to UEXO. The major activities in this phase include: notification and assembly of the recovery teams, implementation of interim procedures, and relocation to the secondary facility/backup site, and re- establishment of data communications.

## **Alternate Site Operations**

This phase begins after secondary facility operations are established and continues until the primary facility is restored. The primary recovery activities during this phase are backlog reduction and alternate facility processing procedures.

### **Transition to Primary Site**

This phase consists of all activities necessary to make the transition back to a primary facility location.

## **2.4- Vital Records Backup**

All vital records for that would be affected by a facilities disruption are maintained and controlled by either the Emergency Response Team or IT Team. Some of these files are periodically backed up and stored on the cloud storage as part of normal operations. When the operations team requires onsite file rooms, scanning, and organization offsite storage locations, best practices advise using the cloud storage system for vital records and data back-up. All vital documents are typically located in files within the office complex and the most current back-up copies are in a secure cloud storage system.

### **Vital Records Backup**

In the event of a facilities disruption, critical records located in UEXO's office may be destroyed or inaccessible. In this case, the last backup of critical records in the secure cloud storage system would be accessed to retrieve the required data. The number of critical records, which would have to be reconstructed, will depend on when the last backup of critical records to the cloud storage location occurred. Operations will arrange the frequency of rotation of critical records to the cloud storage system. The following categories of information can be exposed to loss of:

- Any files stored on-site in file cabinets, drawer units, and safes.
- Information stored on local laptop hard drives.
- Any work in progress.
- Received and un-opened mails.
- Online Access to UEXO's Computer Systems

In the event of a facilities disruption, the Disaster Recovery Plan strategy should be to assist in reestablishing connectivity to UEXO's employees and to establish remote communications to any alternate business site location. If the data center is affected by a disaster or disruption, the Disaster Recovery Plan should include recovering processing at a pre-determined alternate site. Services covered would include landline phones, cellular phones, communications, and all other services required for restoring limited emergency service to the organization.

In this case, data communications will be rerouted from the data processing site to the respective alternate business site locations.

## **2.5- Mail and Report Distribution**

During the time that UEXO's operations are run from the secondary facilities, output reports and forms will have to be delivered to that location. The data center may or may not have the same print capability if the disruption affected the data center as well, so it may be necessary to prioritize printing of output.

The EOC Administration Team in conjunction with the designated delivery/courier services will distribute mail to UEXO's alternate business site. Due to the possibility of multiple alternate business sites and the additional travel time required for mail service activities, the number of mail pickups and deliveries could possibly be

decreased from the normal daily routine to once daily. Mail pickup and delivery schedules, including overnight mail, will be established, and communicated to each alternate business site. Overnight mail/package delivery carriers should be contacted.

directly by a business function for items requiring pickup after the last scheduled pickup by the EOC Administration Team. All overnight mail service vendors will be notified by the EOC Administration Team of appropriate alternate office addresses to redirect deliverables to UEXO personnel or provide for pick up at the post office by a Team member.

### **3-Emergency Recovery Team.**

#### **Purpose and Objective**

This section of the plan identifies who will participate in the recovery process for the UEXO Business Continuity Plan. The team members are assigned either to specific responsibilities or as team members to carry out tasks as needed. The information in this section is organized into several subsections.

#### **Emergency Recovery Team Descriptions**

This section lists the team definitions for the Team and gives a short explanation of the function of each team or function. Emergency Recovery Team: Responsible for oversight of the UEXO recovery functions.

#### **Emergency Recovery Team Assignments**

This section identifies the team roles and the specific responsibilities that have been assigned to the team. Team Leader – Overall coordination of UEXO’s Emergency Recovery Team member – Duties to be assigned on the recovery Team’s area of responsibility.

#### **Personnel Notification**

This section specifies how the team members are to be notified if the plan is to be put into effect by identifying who calls whom, and in what order. References: Appendix A – Employee List

#### **Team Contacts**

This section identifies other people or organizations outside of the UEXO Team who might need to be contacted during the recovery process. Their names and telephone numbers are provided. References: Appendix A – Employee List.

#### **Team Responsibilities**

##### **Business Continuity Coordinator**

In the event of a disaster, the Business Continuity Coordinator is responsible for ensuring that the following activities are successfully completed.

- Works with the UEXO Emergency Response Team to officially declare a disaster and start the Disaster Recovery/Business Continuation process to recover UEXO’s business functions at an alternate site.
- Alert UEXO’s Board of Directors that a disaster has been declared.
- Assist in the development of an official public statement concerning the disaster.
- The UEXO’s ERT Team Leader is the only individual authorized to make public statements about

organization affairs.

- Monitor the progress of all Business Continuity and Disaster Recovery teams daily.
- Present Business Continuity Plan recovery status reports to Board of Directors daily to keep them informed.
- Interface with appropriate work management personnel throughout the recovery process.
- Communicate directions received from UEXO's Board of Directors to the employees.
  
- Provide on-going support and guidance to the Business Continuity teams and personnel.
- Review staff availability and recommend alternate assignments, if necessary.
- Work with UEXO's Board of Directors to authorize the use of the alternate recovery site selected for re-deploying critical resources.
- Review and report critical processing schedules and backlog work progress, daily.
- Ensure that a record of all Business Continuity and Disaster Recovery activity and expenses incurred by UEXO is maintained.
- Ensure that SCA (Securities & Commodities Authority) and the market are notified immediately about the Company's decision to work remotely and provide the following information:
  - Name & Number of the contact person (Compliance Officer) o Contact numbers and location details in the event of remote work
  - Recording the details of devices used in the remote work
  - Any other information that the Company deems appropriate in this regard

## **4-Recovery Procedures**

### **Purpose and Objective**

This section of the plan describes the specific activities and tasks that are to be carried out in the recovery process for UEXO. Given the Business Continuity Strategy outlined in Section 2, this section transforms those strategies into a very specific set of action activities and tasks according to recovery phase.

The Recovery Procedures are organized in the following order: recovery phase, activity within the phase, and task within the activity.

The recovery phases are described in Section 2 – (2.3) of the Plan. In the Recovery Procedures document, the phases are listed in the order in which they will occur.

The description for each recovery phase begins on a new page.

Each activity is assigned to one of the recovery teams. Each activity has a designated team member who has the primary assignment to complete the activity. Most activities also have an alternate team member assigned. The

activities will only generally be performed in this sequence.

The finest level of detail in the Recovery Procedures is the task. All planned activities are completed by performing one or more tasks. The tasks are numbered sequentially within each activity, and this is generally the order in which they would be performed.

## **Recovery Activities and Tasks**

### **Phase 1 – Disaster Occurrence**

Activity: Emergency Response and Emergency Operations Centre Designation Activity is performed at location: Main Office or Emergency Operations Center Responsibility person / team: All Employees

Tasks:

- After a disaster occurs, quickly assess the situation to determine whether to immediately evacuate the building or not, depending upon the nature of the disaster, the extent of damage, and the potential for additional danger.

Note: If the main office is total loss, not accessible or suitable for occupancy, the remaining activities can be performed from the Emergency Operations Center (EOC), after ensuring that all remaining tasks in each activity have been addressed. This applies to all activities where the Main Office is the location impacted by the disaster.

- Quickly assess whether any personnel in your surrounding area are injured and need medical attention. If you can assist them without causing further injury to them or without

### **Phase 2 – Plan Activation:**

Activity: Notification and assembly of recovery teams and employees Activity is performed at location:

Alternate Location (s)

- UEXO's team leader calls each member of the management team, instructs them of what time frame to assemble at the UEXO Emergency Operations Center (to be decided at the time). The EOC may be temporarily set up at any one of several optional locations, depending on the situation and accessibility of each one. Once the Alternate site is ready for occupancy the EOC can move to that location, if preferred.
- Review the recovery strategy and action plan with the assembled team.
- If necessary, adjust the team assignments based on which members are available.
- The Management Team contacts critical employees and tells them to assemble at the alternate site. If the alternate site is a long distance from the primary site (i.e. out-of-state), then individuals should make their own travel arrangements to the alternate site. Non-critical employees should be instructed to stay at home, doing what work is possible from home, until notified otherwise.
- In the event of a disaster that affects telecommunications service regionally, the Management Team should instruct critical employees to proceed to the alternate site even if they have not been contacted directly. Delays in waiting for direct communications can have a negative impact on UEXO's ability to recover vital services. Activity: Relocation to alternate site Activity is performed at location: Alternate Location (s) Responsible Person / Team: All Critical Personnel Tasks:
- When instructed by the Emergency Response Team, decide to commute or travel to the alternate site.
- The Board of Directors needs to consult with the Emergency Response Team to determine if access can be gained to the primary (damaged) site to retrieve vital records and other materials. The Emergency

Response Team will only allow access to the primary site if the authorities grant access. This will be dependent upon the nature of the disaster and the extent of damage.

### **Phase 3 – Alternate Site Operations**

Activity: Alternate Site Processing Procedures

Activity is performed at location: Alternate Location (s) Responsible Person / Team: Alternate Location

Operations Team Tasks:

- Communicate with customers regarding the disaster and re-solicit phone contacts (in conjunction with the Human Resources
- Acquire needed vital documents.
- Access missing documents and files and reconstruct, if necessary
- Set up operation Activity: Manage Work Backload Reduction Activity is performed at location: Alternate Location(s) Responsible Person / Team: Alternate Location Operations Team

### **Phase 4 – Transition to Primary Operations Location**

Activity: Changing Telephone and Data Communications back to Primary Location Activity is performed at

location: Alternate Location (s) Responsible Person / Team: ERT IT

Personnel Tasks:

- Coordinate with the Emergency Response Team to determine when the UEXO employees will be relocating back to the primary site. Verify that they have a schedule to ensure that telephone and data communications are rerouted accordingly.
- Discuss when and how Laptops, terminals, and printers, if brought into the alternate site, will be de-installed, moved back to the primary site and re- installed.