

UEXO GLOBAL MARKETS LLC

Business Activity:

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

Record Keeping Policy

Record Keeping 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 Shan Muhammed Hussian Category Manager Louis DeTata	Louis Detata Owner & CEO Signature

Company Stamp



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1. 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.

Purpose

The purpose of this document is to define and articulate the policies and procedures of data retention and documents archiving & keeping at UEXO office and or premises and or Online using any kind of technology with the most known one as Amazon -AWS- where UEXO can rent server for all kind of data protection, backup and access from many locations, that can done through:

- Providing an overview about the Group's archiving system and controls
- Articulating policies to provide general guidelines of data retention and documents archiving.
- Prescribing procedures that shall be followed through the archiving process.

Overview

The archiving policies and procedures manual is established in accordance with the rules and regulations governing the securities and commodities authority in the UAE and international best practices.

This manual sets and defines UEXO archiving requirements and how to implement them. Review shall be made of this manual on an annual basis or as necessary to reflect changes in applicable laws and policies. Any amendments or additions to a policy and procedure are to be initiated by the department head and approved by the Board of Directors represented by the CEO.

Enforced regulations.

Federal Decree-law No. (20) of 2018 ON ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM AND FINANCING OF ILLEGAL ORGANISATIONS, and Cabinet Decision No. (10) Of 2019 concerning the implementing Regulation of Decree Law No. (20) of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations, Decision of the Chairman of the SCA Board of Directors No. (13/R.M) for the year 2021 regarding the rule book Financial Activities and Reconciliation Mechanisms as per URL:

<https://www.sca.gov.ae/assets/7949008c/en-licensing-of-the-financial-activities-and-jobs-approval.aspx>

“UEXO” shall comply with the following regulations (SCA):

“UEXO” shall maintain books and commercial records or use computer systems and other modern technical systems that comply with international accounting standards, audit standard and the requirements issued by the Authority and to maintain the information and orders of clients, whether written, recorded on the phone or having been received in any other electronic means decided by the Authority for a period of 10 years.

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Backup copies of this information and orders must also be kept for the same period to safeguard the clients' data and transactions and prevent them from getting damaged for any reason.

“UEXO” shall maintain, at any time, the records, documents, accounts, and financial statements that clarify the company's financial position and the financial position of its clients, as well as the transactions and account opening agreements of each client. These records and documents shall be provided to the Authority upon request.

Also, all docs related to any client in term of proof of address, proof of identity, source of wealth and KYC per each client related to onboarding journey.

“UEXO” shall keep true copies of the documents and papers related to opening an account or introduce client to any other regulated firm from which data and information have been obtained, after verifying their validity by comparison with their originals and annotating thereon by the employee in charge that they are true copies.

“UEXO” shall develop an integrated system to keep the records, documents, and papers related to the application of the AML regulatory requirements in a manner to enable them to meet the request of the Unit and the Authority when necessary for a period no less than five years from the date of closing the client's account, or from the date of finalizing transactions with the Market and Financial Institution.

“UEXO” must maintain log for all kind of changes, edit, login, view, modify, delete, cancel and all any kind potential of changes over any record per each user per each access rights including but not limited to:

- 1- Clients Data
- 2- Financial Data
- 3- Manuals and company procedures
- 4- Technology systems
- 5- Meeting minutes and all kinds of meeting summary.

Such records shall be adequate to allow reconstruction of individual transactions (including the amounts and currencies used, if any) to provide evidence when necessary to prosecute the criminal activity. Copies of such records and documents shall be kept in the form of microfilm or soft formats.

Definitions

The following definitions are intended to provide a general understanding of the terms used in this document.

Authority “SCA”: The United Arab Emirates Securities and Commodities Authority.

BOD: UEXO's board of directors.

Compliance Officer: The person appointed in the Market and Financial Institution for the purpose of applying the procedures of anti-money laundering and combating Terrorism Finance and illegal organizations in accordance with the legislation in force in the UAE.

Internal Audit Department: that helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.

Client: Any individual person or corporation with whom the Market and Financial Institution are dealing

with such as and including opening an account in his name or providing a service thereto.

DOA: Delegation of authority which illustrates the authority given to each employee within this manual

Ownership

Each member of staff (front, middle and back office) is responsible for the strict implementation of the policies and procedures contained in this manual, and for identifying and reporting, to the Business Support “BS” head, any policies or procedures that need to be added, modified or deleted, in order to keep the manual current and relevant.

It is the responsibility of each staff member to report any instances of non-compliance with this manual, in accordance with the Group’s whistleblowing policy. Staff failing to conform to the policies and procedures set out in this manual shall be subject to disciplinary proceedings, including termination.

The BS department is responsible for developing, logging amendments, and updating this manual at least on annual basis, or more frequently if circumstances necessitate.

Any such amendments and updates are to be approved by the board with the signature of the CEO.

2. Responsibilities

- BOD

The Board retains the ultimate responsibility for effective management and supervision over the archiving structure across the organization; and for ensuring that policies and procedures are being implemented, in accordance with SCA’s regulations.

- Business Support Department

- Developing and maintaining archiving policies and procedures manual in line with evolving statutory and regulatory obligations.
- Serve as a custodian for all archived documents.
- The administrative day-to-day management of the data archival management implementation and operations in addition to managing the duties and responsibilities for the effective management of the archiving procedures.

- Internal Audit Department

Conducting internal audit and providing independent assurance on the effectiveness of the necessary controls established in this manual.

- All employees

Strictly abiding by the applicable policy guidelines as stated in this manual and ensuring its effective

implementation and maintenance.

3. Archival Policies & Procedures of data Keeping.

Archival Policies

- Copies of all the Group's documents (electronic and manual) shall be archived for a period of not less than 10 years.
- Copies of all customers' documents (electronics and manual) shall be archived for a period of not less than five years from the date of closing the client's account.
- UEXO shall maintain a fully secured environment for all its documents against theft, loss, damage, unauthorized access, for the purpose of audit trail and documentary evidence in case of litigation.
- UEXO shall maintain a reliable, reconciled and quality-controlled data archival management system where all documents are stored.
- Each department shall be given access to the data archival management system only to its related documents.
- Each department shall design its own archiving folder structure on the data archival management system.
- Each department's soft copy documents shall be scanned and stored in the department's archiving folder structure.
- Hard copy documents used on daily basis shall be stored in locked file cabinets in the related department's venue.
- Hard copy documents no longer in use shall be stored in a secure location and in metal fire-resistant filing cabinets.
- The business support department shall be the custodian of all hard copy documents archived in the store.
- Retrieval of archived documents shall require proper approval as per this manual's DOA.
- All documents exceeding the retention holding period shall be destroyed, upon proper approval as per this manual's DOA.
- The Business Support department shall maintain a list of documents destroyed permanently.

4. Archival procedures & data keeping

- Upon obtaining and/or producing a document while conducting any business activity, the related department shall ensure that such document is scanned and saved in the department's folder structure in the data archival management system; as well as storing it in locked cabinets in the related department's venue.
- System generated documents saved in the Group's data archival management system shall be given an automated serial number.
- Each department shall assign two users to use the data archival management system.
- Once the hard copy documents are no longer in use by their related department, the documents shall be forwarded to the BS department for archiving. Monthly signoff shall be taken from all brokers, on a monthly basis, attesting the handoff of all hardcopy and softcopy orders for archiving.

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- BS department shall ensure that the documents are stored in cardboard file boxes, labelled on the front with the date, contents and archiving system generated serial number (where available).
- BS department shall store all hard copy documents in a secure location which is locked and alarmed outside normal working hours.
- Any employee requesting to retrieve archived documents shall initiate the “checkout workflow” request through the Data Archival Management system, which shall then be approved as per this manual’s DOA and processed by the BS department.
- Once the checked-out document is returned back by the concerned employee to the BS department, the BS department shall ensure that documents are complete and not damaged. The employee shall then initiate the “check in workflow” request through the Data Archival Management system, which shall be approved by the BS department.
- At year end, the BS department shall verify the documents that have exceeded the designated retention period for destruction. Approval for documents destruction shall be approved as per this manual’s DOA.
- Once approved, BS department shall select a method of destruction which ensures that destroyed records cannot be reformulated, reproduced, or recompiled by unauthorized internal and/or external entities.