

Manual of Reporting Violations & Reporting Legislation

UEXO GLOBAL MARKETS LLC

Business Activity:

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

Manual of Reporting violations and Reporting violations of legislation

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Company Stamp



LOUIS GUY DETATA

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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.

Definitions

Good Faith:

An employee shall be deemed to be whistle blowing in 'good faith' if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee does not have personal knowledge of a factual basis for the whistle blowing or where the employee knew or should have known that the whistle blowing is malicious, false or frivolous., such action will lead to investigate with client with suspension period can be extended up t termination.

Unethical and Improper Practices:

- An act which does not conform to approved standards of social and professional behavior.
- An act involving unethical business practices.
- Improper, wrongful or unethical conduct.
- Breach of Code of Conduct or morally offensive behavior.
- Breach manuals related to core business module and daily operation.
- In general, the above improper conduct will be seen in wrongdoing of a financial or legal nature, such as corruption, theft, fraud, misuse of UEXO property or cash, abuse of official position for personal gain, etc.

Reporter of violation:

An employee of UEXO who discloses in Good Faith and in writing any Unethical and Improper Practices to the Compliance manager and or to the Internal Audit committee along with HR department.

Wrongful Conduct:

Violation of law, breach of duty of care, infringement of UEXO's Code of Conduct, misappropriation of monies and actual or suspected fraud or abuse of authority, of a financial or legal nature.

2. Purpose of the document

The purpose of this document is to demonstrate and describe how “UEXO” is committed to the highest standards of ethical and legal conduct. In line with this commitment and in order to enhance good governance, openness, integrity and transparency, “UEXO” sets this Policy to enable its employees to report concerns internally in a responsible and effective manner when they discover information which they believe is a malpractice, without having any fear that their action (i.e., reporting of such incident) may have adverse effect/ consequences, (As per Paragraph (19) article 1, Chapter 4: Doing Business – Decision of the Chairman of the SCA Board of Directors No. (13/R.M) for the year 2021 regarding the rule book Financial Activities.

This Policy is intended to assist employees to report any act of malpractice or impropriety observed to report it, without having any fear that their action may have adverse effect/consequences. It is putting in place arrangements that will ensure that employees who report irregularities in good faith with all supporting docs and proofs are provided utmost protection against any possible retaliation or reprisals, whether actual or threatened, as a result of their whistleblowing.

3. Approval of the Policy

The Policy and any upcoming changes should be approved by the Board & CEO.

4. Scope

This Policy applies to all permanent and temporary employees, directors and any other person working for “UEXO” and it’s providing the “UEXO” with services including agents, consultants, auditors, suppliers and other service providers under contract with the “UEXO” (grouped together for the purpose of this Policy under the term “employee(s)”). The Policy applies whenever the employee is employed or engaged in contract as 3rd party by the “UEXO”.

5. What is Whistleblowing & related that to Reporting Violations?

The reporting or the disclosure of a fraudulent activity or an attempt deemed illegal or malpractice which may have a possible impact on the UEXO’s customers, employees, shareholders or reputation. Following are few examples of serious malpractices:

- Fraud;
- Corruption;
- Bribery;
- Conduct which is unethical or illegal.
- Acting outside proper financial accounting, reporting and auditing standards;
- Intentional negligence or non-compliance with the UEXO’s internal controls & manuals.
- and policies which results or facilitates fraudulent act;

- A deliberate concealment of information; and
- Mismanagement

6. The Fundamental Elements of This Policy

- Employees will not lose any of their employment rights because of any disclosure and whistleblower in good faith, where the disclosure is made in good faith and is not made maliciously or for personal gain or to mislead the company for the main goals.
- All disclosures will be investigated thoroughly.
- All disclosures will be treated with utmost confidentiality and every effort will be made not to reveal the identity of the Reporter of violation and other concerned persons should the Reporter of violation so wish. However, UEXO cannot guarantee providing anonymity to the identity of the Reporter of violation if external legal action follows the disclosure or the resolution of the concern requires revealing the name of the Reporter of violation. Should UEXO have to reveal the identity of the Reporter of violation, it will inform the Reporter of violation, in such cases like form Local Police, SCA & Dubai Courts...etc.
- UEXO is not accountable for maintaining anonymity where the Reporter of violation has told others of the concern.
- UEXO expects the Reporter of violation to maintain high level of confidentiality and not to disclose the matter with other employees of the UEXO.
- Breach of any confidentiality requirement under this Policy by any party involved in the investigation process of the incident reported will result in a disciplinary action.

7. How Do I Raise a Concern?

- The initial reporting can be verbal or in writing, in UEXO the better is to have close meeting with Compliance team member & internal audit team member and report a case with meet minutes to be signed by all parties.
- However, based on the Compliance manager's advice, the same must be documented via email, if the initial reporting was verbal.
- The following details must be provided:
 - Type of Malpractice
 - Person(s) involved
 - Any evidence (if available)
- Reporter of violation may report the matter by the way that is preferred.
- Initial meeting minutes to be shared with the CEO to decide if UEXO need to go on with such a case in urgency matter or to be low prioritized.

- Keep register of all whistleblowers.

8. Do I Need Proof of Wrongdoing to Report any Matter?

Reporter of violation can raise the concerns even if Reporter of violation do not have proof or evidence; however, it must not be a false allegation due to personal or professional conflict.

Where possible and as applicable, include the following information in your email or in the investigation session with Compliance & internal audit team:

- An outline of the known or suspected wrongdoing.
- Details, to the best of your knowledge, about when, where and how it occurred;
- A list of the names of those suspected of being involved (both within UEXO and externally);
- A list of the names of anyone who may have relevant information;
- Details of how you came to know about the suspected activities;
- An estimate value of the loss to UEXO or other stakeholder holder known;
- Breaches of internal controls, policy, procedure or other requirements if you believe that took place;
- Any specific recommendations you have for actions;
- The name(s) of person(s) whom you have discussed this incident;
- Your name and contact details.
- Date and time of making the report.
- It is recommended that you mention the subject of the email as “Whistle blow”.
- You are not expected to prove the wrongdoing that you have witnessed or suspect. However, you will be required to explain the reasons for your concern, i.e. reporting of the matter.

9. How Will the Report be processed?

On receipt of the “Whistle-blowing incident”, Compliance manager will provide you with an acknowledgement email or via meeting minute.

Preliminary enquiries will then be made as confidentially as possible. If it is determined that further investigation is necessary, the case may even be referred to the relevant external body depending upon the nature and the seriousness of the incident reported.

The final investigation report will be submitted to the Head of Internal Audit for review and validation, before being submitted to the Board & CEO.

10. What Will Happen on Completion of the Investigations?

Subject to any legal constraints, the UEXO will communicate the findings of the investigation to:

- The person who raised the report.
- The individual(s) under investigation.
- The members of the audit committee.
- External authorities who need to be considered (e.g.: SCA, UAE CB & Ministry of Labor). Whether action should be taken because of the findings.
- Where an employee is found to be involved in any wrongdoing, they will be dealt with in accordance with employment law, any other applicable law and HR policy of UEXO.
- All documents produced during the process represent evidence that should be preserved, protected and retained in accordance with the UEXO's record retention policy and applicable law. As these may pertain to confidential matters reported by Reporter of violations, the hard copies documents will be stored in restricted access and the electronic data will be secured.

11. Protecting the Reporter of violation.

Any individual who in good faith reports any violation of the Code of Conduct & Ethics, non-compliance of UEXO's policies and/or rules, or financial misrepresentation and misappropriation, will be protected by UEXO.

UEXO will not discharge, demote, threaten, harass or retaliate against such individuals and will take appropriate actions to protect the Reporter of violation.

If the Reporter of violation noticed that it has affected them adversely in any way, he/she has the right to make representations to the Board & CEO, who will consider the claim and make a determination on a case by case basis. Each decision will be deemed to be final.

However, UEXO may take appropriate disciplinary action against a person, at its sole discretion, if upon investigation it is revealed that the report was merely made to defame the other person and was a result of any personal or professional conflict.

While reporting an incident, the Reporter of violation should take every care to ensure the accuracy of the information and ensure that they have understood the facts thoroughly. Even if the incident is not proven, it may carry a degree of reputational damage for the person to whom the reported incident relates to,

which can be difficult to reverse.

Employees are encouraged therefore to follow the highest standards and to be as certain as they can be before reporting an incident.

12. Confidentiality

UEXO will protect the employees' identity. For this mechanism to be effective, the concerned parties must adequately be assured that the information given will be treated in a confidential manner and above all that they will be protected against retaliation from within and outside the UEXO.

UEXO maintains as confidential, the employee identity unless:

- Such a person agrees to be identified by himself by sharing stories with other.
- It is a statutory requirement particularly if it is essential to ensure that the right of the persons implicated to be given a fair hearing is upheld.
- Identification is necessary to allow UEXO or the appropriate law enforcement officials to investigate or respond effectively to the disclosure.
- The person accused is entitled to the information as a matter of legal right in the disciplinary proceedings. In such a situation, the employee will be informed prior to revealing his or her identity. Notwithstanding this.

However, the Reporter of violation shall at all times continue to be protected.