

UEXO GLOBAL MARKETS LLC

Business Activity:

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

Outsourcing 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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Table of Content:

1. INTRODUCTION	4
2. Selecting and engaging service providers.....	5
3. Special appointment obligations	6
4. Monitoring service providers.....	7
5. Compliance with this policy	8

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.

This policy sets out rules & standards for engaging with outsourced service providers as vendors related to Accounting services & clouding, services from vendors related to Accredited jobs as per SCA requirements and all the rules that SCA asked for as per The Chairman of the Authority's Board of Directors' Decision No. (13/Chairman) of 2021 on the Regulations Manual of the Financial Activities and Status Regularization Mechanisms Rule Book in section 2 as licensing of financial Activities.

The measures are intended to help ensure that each provider is providing services as required by the agreement, and to ensure avoids breaching its legal obligations.

Outsourced providers & vendors are described in our List of Existing Service Providers Template. We engage providers to help us with [tailor to our business modules needs]: the below are examples of a services may we need to outsource it.

- IT systems
- Research on financial products.
- Operation of call centers & calling system.
- Client onboarding and KYC
- Legal and accounting services
- Recruitment
- Education and training
- Reporting services, such as derivative trade reporting
- Periodic compliance reviews on representatives
- External auditor
- Dispute resolution including internal dispute resolution & law firms.
- Consultancy firms related to accredited jobs in terms of financial analysis or compliance.

This policy sets out our processes in dealing with providers, including external outsourced providers (local & international) and members of our corporate group who we outsource services to.

We authorize third parties to engage in financial services on our behalf so these 3rd parties can share all the needed tasks to be done with us as a company SCA regulated and these outsourced vendors must be aware that SCA will be updated for such outsourced contractual agreement and SCA may ask these

vendors to have site visit in their offices. This policy does not apply to our engagement of or monitoring and supervision of such authorized representatives' policies like Monitoring and Supervision Representatives Policy and our Client Review and Remediation Policy for detail on those activities.

Although we may outsource a function of our business, it remains our responsibility to ensure compliance with our obligations under Decision of the Chairman of the SCA Board of Directors No. (13/R.M) for the year 2021 regarding the rule book Financial Activities Accordingly, this policy sets out the controls we have in place to ensure we are continuing to comply with our obligations, despite outsourcing a function.

2. Selecting and engaging service providers

Any engagement with any outsourced vendors must be as per agreement, [Note: UEXO can make outsourcing process more detailed by categorizing providers into Low, Medium, and High risk. **UEXO Financial Services L.L.C** with commercial license Number **1526032** issued by Dubai Economy & Tourism are confirming that we are seeking approval from the SCA for approval of regulation under Category 5 with application with reference number LIC-0009753 as arranging and advising with activity financial consultancy that we are involved in with the SCA. decided to create "Material Outsourcing Arrangements" as a high-risk category, to keep this engagement risk-based, but simpler.]

Prior to engaging an outsourced provider, the Compliance Manager will consider the risks and controls required in relation to outsourcing the function.

The Compliance Manager will determine who is responsible for each outsourcing arrangement if it is not the Compliance Manager. The Responsible Person for the outsourcing arrangement is documented in our List of Existing Service Providers Template.

Compliance manager once manage to create the needed matrix as checklist of appointing, that one must be approved by the CEO since the final call will be from CEO side.

When selecting and engaging a new external services provider, the Responsible Person for that arrangement will complete a copy of the Engagement Checklist for Outsourced Providers Template. It sets out various due diligence steps that we have agreed are important to our business.

The template will be amended for each provider, as appropriate, also to consider as week Risk Policy based on each vendors as per each business environment like IT Vendor Vs External Audit one.

Before selecting a provider, the Compliance Manager will determine the materiality of the outsourced arrangement by considering:

- Financial, reputational, and operational impact should the provider fail to adequately perform the activity.
- Potential losses to customers and counterparts in the event of the provider failure; Consequences of outsourcing the activity on the ability and capacity to conform with the law, regulatory requirements and changes in requirements.

- Cost; Interrelationship of the outsourced activity with other activities; Affiliation or relationship with the provider; Regulatory status of the provider.
- Degree of difficulty and time required to select an alternative provider, or to bring the activity in-house (if necessary).
- Complexity of the outsourcing arrangement.
- Ability to handle business issues and availability of risk matrix.
- Conflict of Interest Vs dealing with group contains many vendors that UEXO may looking for.
- Financial background with other clients that 3rd party vendor engaged with earlier.
- SCA rules, that SCA may visit Vendor and is approved by SCA to implement same concept of outsourced Service to many clients including UEXO if needed.
- UEXO can not at all outsource all accredited jobs and main tasks to be by 3rd party.
- UEXO will be the main player where SCA is maintain the needed communication to get all kind of reporting, so SANBAIL must make sure that 3rd party is able to do the needed tasks since the failure with that will be as full responsibility of UEXO.
- UEXO must make sure that 3rd party vendor's staff is fully accredited by SCA to perform the needed tasks and job if needed to be outsourced.

Extra Controls when the arrangement is a Material Outsourcing Arrangement

For a Material Outsourcing Arrangement, we undertake additional due diligence prior to engagement. These checks are documented in the Engagement Checklist for Outsourced Providers Template.

3. Special appointment obligations

The Decision of Chairman of the SCA Board of Directors No. (13/R.M) for the year 2021 regarding the rule book Financial Activities, imposes appointment obligations on certain activities.

The Engagement Checklist for Outsourced Providers Template includes additional due diligence for appointing:

- Providers of internal dispute resolution
- External Auditors
- IT solutions

For the above must consider the following:

- 1- Make sure that these vendors are aware of the risk of performing such a task to UEXO
- 2- Make sure that the server of these vendors is inside UAE.
- 3- NDA is a must for these vendors.

- 4- Vendors must share external audit report from 3rd party who is CISA certified to make sure that these IT infrastructure for these special appointing are safe and secure in term s of back-up, keep data for 10 years
- 5- Make sure that there is a success story with such a vendor as per SCA requirements and the needed business experience as per SCA requirements is available with such a supplier.
- 6- Also, UEXO must have exist strategy one dealing with these vendors to make sure that data is safe and UEXO has full access over it.

After the outsourced provider is engaged

Once an outsourced provider is engaged, its details are added to the List of Existing Service Providers. The Responsible Person for the arrangement will be listed on this template, which is Compliance manager and his reports must be reported to internal audit committee and CEO.

The Responsible Person for the arrangement will file the completed copy of the Engagement Checklist for Outsourced Providers with the contract of engagement. This can be stored as a hard copy, electronic copy, or both. Once an outsourced provider is engaged, the Compliance Officer, in conjunction with the Compliance Committee [or Internal Audit Committee or Risk management committee as Per final call from the CEO of UEXO], will ensure the outsourcing risks and controls are taken into account as part of our Risk Management Framework.

4. Monitoring service providers

Depending on whether the outsourced arrangement is a Material Outsourcing Arrangement, the Responsible Person for the provider will monitor and supervise the provider, and conduct a review of the provider's performance in accordance with the following timeframes:

Provider	Frequency
Material outsourcing provider	Quarterly
Providers of internal dispute resolution	Quarterly
Introducing brokers	Quarterly
All other providers	Semi-annual

The Responsible Person for the provider will conduct the monitoring and supervision based on the Service Provider Review Checklist Template, in UEXO case will be compliance manager.

Prior to using the template, the Responsible Person shall ensure that it has been appropriately tailored for the provider as per the scope of work signed with UEXO and as per agreement and all supporting documentation docs of each vendor.

Once a provider of a Material Outsourcing Arrangement has been reviewed in accordance with the

checklist, the findings of the review will be reported to the Compliance Committee, based on compliance committee remarks to be shared with internal audit to start work over new remarks as change vendor, keep vendor or upgrade vendor by assigned new tasks as per SCA framework.

- **Outsourcing from outside UAE.**

All kinds of cross-border outsourcing must inform SCA about it.

All kinds of accredited job as per SCA must not be assigned to any vendor working outside UAE. UEXO must get all vendor docs so incase SCA looking for having these docs to study the profile of that Vendor outside UAE, part of these docs as follows:

- Company License and MOA
- Ownership and list of directors.
- Proof of address for the company
- World check report the 3rd vendor is not engaged in any financial issue.
- UEXO must get pre-approval from SCA for these kind of outsourcing.

5. Compliance with this policy

We ensure compliance with this policy by ensuring all staff have access to, and are made aware of changes to, this policy as soon as the Compliance Committee and Internal Audit committee shared all needed feedback to the CEO of UEXO and CEO has provided on the policy.

Annually, the Compliance Manager will review a sample of new outsourcing arrangements and outsourcing reviews to ensure compliance with the policy.