

UEXO GLOBAL MARKETS LLC

Business Activity:

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

Work Procedures 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



LOUIS GUY DETATA

Table Of Contents

1. INTRODUCTION	4
2. Reporting.....	8
3- Sign the Reports & submission to SCA.	10
4- Organizational Structure	10

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.

Work Procures Policy indicate in the main places, functions, departments & main professionals that are a must to be available in the company, so UEXO can work & run smoothly as per the business module.

1.1. Purpose and Scope

This manual sets out policies and procedures that govern the operations activities at UEXO. (herein called “the Company” or UEXO). The Manual include the following:

- Key Definitions, List of Acronyms and Code of Ethics.
- Client Service
- End of Day Procedures
- End of Month Procedures
- Commissions; Remunerations
- Quarters & Annual procedures.
- Complaints& rewards
- All manuals that govern that UEXO will be under full corporate governance based on all aspects including but not limited to AML, Internal audit & Control, Daily operation & reporting...etc.

The purpose of these policies and procedures is to:

- Establish adequate control measures for the operational activities.
- Provide and maintain an up-to-date reference guide to employees in executing transactions with regards to the brokerage; and
- Make sure that UEXO hub of all polices & manuals along with work procedures are explained in detail.
- Guidelines and protocol for all major principles & actions between all departments.
- Ensure uniformity and consistency in applying various procedures pertaining to the operational activities.
- Responsibility and Maintenance of the Policies & Procedures Manual
- Make sure that UEXO culture between all staff is spread well in term of operation & financial wise.

The responsibility of updating and administering this manual lies with the Chief Executive Officer.

The policies and procedures manual shall be updated on an ongoing basis, as required. However, it should be reviewed

and reassessed at least annually to account for major business changes.

Proposed changes to procedures must be approved by the Chief Executive Officer. Employees requesting modifications, additions or deletions to existing policies and procedures shall use the “Change Request Form.”

(Form O1) included in the appendices. The Change Request Form shall be reviewed and signed by the Head of Department for assessing the change before forwarding it for approval. In doing so, the Head of Department will provide his recommendation (reject or endorse) concerning the amendments to the CEO as necessary.

It is the responsibility of the Head of Departments / Assistant to communicate, in a timely manner, these policies and procedures to the concerned staff and ensure that they are clearly understood by all.

Changes made to the processes or control procedures will be updated and a document revision history will be maintained.

Version	Date	Compiled by	Description
1.0	DEC.2025	Louis Detata	Version 1

Any changes done over any daily work procedures related to UEXO’s manual, must be approved by the CEO and other departments like compliance must started the process of share knowledge then after that once all staff are aware of that, Internal audit can practice their work in case of non-compliance.

1.2. Document Control and Approval

This Operational Policies and Procedures manual has been approved by the Chief Executive Officer

Name: Mr. **Louis Detata**

Designation: CEO

Client Service Department

1. The client service department is responsible of the following:

- Account Opening
- Updating clients’ information
- Receiving Clients’ requests for onboarding or for the type of services.
- Receiving Clients’ requests for the type of services that client looking for like Financial Consulting or planning.
- Update Clients’ Holdings for Corporates actions.

Account Opening

Policies

Clients wishing to open an account with UEXO should complete the client account opening form with the following mandatory information:

- Class of the customer
- The customer's details.
- The Customer's financial details
- In the case of the customer is of political significance in a foreign country. Such capacity would be present by the customer's political or occupational status, such as being a high ranking official in an executive or legislative body, a military officer, or a judiciary member in a foreign government, or a relative thereof. If the competent employee in the company has ensured the availability of such capacity to the customer, he must obtain prior written approval to deal with the customer from the CEO of the company.
- Full name & address
- PO Box number and e-mail address,
- Mobile number, home telephone, work telephone number and fax number,
- Nationality,
- Date of birth,
- Nationality number
- Valid passport number

For the documents that we need to collect from the client as Original with Seen stamp or via email must be as the following:

- **For individuals (Locals):**

- Copy of the passport
- Copy of Nationality Book Card for Locals Emirati.
- Copy of Emirates ID

- **For individuals (Non-Locals- Foreigners):**

- Copy of the passport with a valid residence visa
- Copy of any other valid ID such driving license, work permit etc
- Copy of Emirates ID

- **For companies:**

- Copy of the memorandum of association
- Copy of the attested letter of authorized signatories
- Copy of the valid trade license
- Copy of the valid commercial registration
- Copy of the valid Chamber of Commerce Certificate
- Copy of the valid power of attorney (proxy). Proxies are considered valid if they are less than three years old.
- All AOF should be reviewed and approved by the Head of Operation Services prior to be validated in the system.
- Certificate of Shareholder & director

For internet usage for client like to view his dashboard or the services that client got from UEXO, the system will create the username and password that is automatically sent to the client. Then it's requested to be changed for password immediately by the client by first login.

Step	Responsibility	Input	Task(s)	Output
1	On-boarding Team	<ul style="list-style-type: none"> - Account Opening Form (AOF) completed. - Client Data Entry Application - Completed Original Documents Copy 	<p>Review the Account Opening Form and ensure correctness completeness of the application.</p> <p>Cross check details recorded in the AOF to the original documents.</p> <p>If discrepancies were noted, amend accordingly, otherwise, update New Client Log Sheet, stamp copies of "Original documents Seen" and submit the documents to the Client Service Officer or On-boarding team as head of department for approval.</p>	AOF information reviewed for completeness with details crosschecked AOF sent to the CSO

Step	Responsibility	Input	Task(s)	Output
2	Compliance Officer	AOF and hard copy documents or soft copy with all supporting docs.	<p>Perform a random review.</p> <p>If discrepancies were noted, return documents to the Head of Customer Services and request the necessary adjustments;</p> <p>If no discrepancies were noted, sign off the documents</p> <p>Forward AOF and documents to the OPS</p>	Account activated reviewed by the Compliance Officer AOF and hard copy documents reviewed by the Compliance Officer
3	Operations Officer	AOF and hard copy documents	File Documents	AOF and hard copy documents are on place. Make sure that client is able to login to account and start making transaction as per UEXO business Module.

Customer services department-CS-

Review client information for validating the passport, ID& all documents expiry date.

CS team will be in touch with client from Phase 1 which is onboarding, validate client info, help client to be onboarded with the needed regulated trader that UEXO is going to advise to go with.

Also, CS team will help client to select the needed Services that client is looking for to tailor the exact services as per what client is looking for.

After that client will be onboarded With UEXO then client will be able to select the company that client is looking for to trade with that UEXO is referring or for the other financial services that client is looking to get from UEXO. In this manual and company policies, will be only company that client is looking to select which is <https://www.UEXO.com/en/> since UEXO will be the main selling arm from <https://www.UEXO.com>. and the services that UEXO is going to offer to clients is introduce these clients to main HQ which is UEXO Group.

Once the client selected the company that he is looking to Trade with, Engagement level of UEXO is over. UEXO will send email to client informing that role of UEXO is over by introduce client to <https://www.UEXO.com/en/> via UEXO that is SCA regulated & authorized to do such a business.

Sales Process

UEXO is committed to train Sales team to do the needed cold calling as per the following.”

- Sales must stick to a valid sales script approved by Compliance and the CEO of UEXO.
- Sales must explain & elaborate the service very well to the client.
- If client asked to do not contact again, then sales team of UEXO must do that.
- Sales must declare that the leads are coming from cold calling or from marketing campaign that was done by UEXO Group - <https://www.UEXO.com>.
- Sales must have full knowledge in terms of services, product, ethics of Sales and how to close deal with client based on source of lead.

2. Reporting

UEXO is liable each quarter to share the following reports with SCA as per the following:

2.1. Introduction to Financial Services, where the Introduction process for UEXO is must to report to SCA for the income form this activity along with other info as

- Total of All clients who got such a service.
- Total number of clients in UAE
- Total Number of active clients.
- Total number of UAE base active clients.
- Total Number of active clients due to the reporting period.
- Total number of new introducing with in the report period.
- Also the expenses allocated to these activities so it can be generated.

Like over all the idea of this report is to build financial data related to Income statement along with other managerial reporting for indicator of the clients.

2.2. Audited Financial Statement

Where the needed here is to Report Financial Data as Income statement for the revenue & for the Expenses along with other managerial data.

Such a report to be prepared by 3rd party CPA auditor accredited by UAE to do such a task.

Financial Data reporting for the first period to be not less than 6 months and not more than 18 months for the annual bases, then after that to be 12 calendar month from Jan to Dec each year.

While for the quarterly reporting, to be for each quarter based on accounting principle -FASB.

So, the 2 reports come from Profit loss statement as Financial Data along with Business related activity for the managerial data, all these reports to submitted to SCA with in max 45 days once the quarter is over.

For the Annual reporting, UEXO is obliged to submit the same, while the period will be as grace period of 3 months once calendar year is over.

As per below template to be filled:

Introducing	
Company Name	
Profit and Loss Statement	Business Related to Activity
Period	
INCOME	CLIENTS
Income from Introducing Activity	Total # of All Clients for Introducing Activity:
Other Income	Total # of Active Clients for Introducing activity:
Other Income	# of New Introducing During the Period:
TOTAL INCOME	Total # of New Clients During the Period:
EXPENSES	
Expenses Allocated to the Activity	
Other Expenses	
TOTAL EXPENSES	
NET INCOME	

Signature
Activity Manager

3- Sign the Reports & submission to SCA.

Per each that UEXO must submit to SCA that Category Manager, & CEO must sign & stamp these reports.

Also, category managers must always maintain clear communication with SCA to make sure that whatever SCA is looking for can be available within the time frame.

4- Organizational Structure

UEXO must declare for all staff how the company is managed based on management style as centralization, where CEO must be involved for all major calls that is affecting business directly. While for other internal discussion that UEXO is maintaining system of authorization where CEO is able to delegate for other Executive members in each department to run and make decision as per work procedures and manuals of UEXO.

For the reporting line where UEXO declare that who is reporting to whom.

- UEXO is managed & governed by a CEO.
- Internal Audit department, its reporting directly to the CEO as a fully independent department.
- Sales, where there are Sales members reported to the head of Sales and head of Sales reported to the CEO.
- Operation Department, same module as per Sales department.
- Marketing department, same module as per Sales department.
- HR, same module as per Sales department.
- Finance, same module as per Sales department.
- Compliance & Risk, same module as per Sales department.
- IT, same module as per Sales department.

Each department cannot cross the line with other departments and start doing orders to other staff not belong to other departments.

For the accredited job in UEXO Case, the needed is:

- Category Manager, where will be responsible for managing all tasks and process related to 5th category as arranging & advising with activity Introduction to Financial Services.
- Compliance Manager, where will be responsible for complying with all rules as per local one in UAE (SCA, Central bank & other local ministers as Economic, Finance).

For these 2 positions, report to the CEO directly to avoid any conflict of interest with other departments.

Staff of UEXO as organizational structure can be managed to be shared from HR department, where that can be done based on department level or employee level, such a report can be figured out for the following:

- Number of all staff in UEXO
- Department of each staff.
- What is the managerial level as CEO, partner, Executive, manager, director, senior, junior
- List of outside contractors as 3rd party like IT service provider, External auditor...etc.
- Update job description per each employee specially the accredited job as per SCA.
- Whom reporting to whom.

HR department will be liable to share KPIs er each department and employee with Compliance team & internal audit to make sure to have remarks on that for corrective action if needed & that's led to hire or fire, upgrade or downgrade along with bonuses.

