onequity

Record Keeping Policy

NOVEMBER 2025

OnEquity (MU) LTD
FSC License
No. GB23201814

ONEQUITY (MU) LTD (the "Company", "We" "OnEquity") is regulated by the Financial Services Commission Mauritius ("FSC") under license number GB23201814 as an Investment Dealer (Full Service Dealer, Excluding Underwriting). The Company is committed to meeting its recordkeeping obligations to make, keep full and accurate records as per Mauritius Laws and FSC regulations, rules and guidance.
ONEQUITY (MU) LTD will implement appropriate strategies, processes, applications and tools to ensure records of business activities are made and kept.

1. Purpose

This policy aims to ensure:

- Accountability and increased efficiency including reducing time spent finding records and enhancing information sharing within the company (where possible)
- Compliance with FSC' record keeping rules and regulations and that all employees are aware of their recordkeeping responsibilities.

2. Scope

This policy applies to all the Company's activities. It forms part of the Company's governance framework and it applies to all employees and contractors.

Record Definition: A "record" has the same meaning as "document" as defined in the applicable legislation and "electronic record" has the same meaning as defined in the Electronic Transactions Law (as amended). Original records include records originating electronically or electronic copies of paper-based records. All records must be legible and easily accessible.

Record Accessibility: Accessible records are records that can be provided by the relevant entity to an Authority within a reasonably short timeframe. The records should be provided within 1-3 business days from the time they are requested, or within the timeframe as determined from time to time by the Authority, whether stored within the Mauritius or in another jurisdiction.

3. Principles

Below are the principles that guide our record keeping policy and philosophy:

Risk Disclosure: Trading in financial instruments involves substantial risk and may not be suitable for all investors. The value of investments is volatile and can result in total loss of capital. Investors should consider their financial situation, investment experience, and risk tolerance, and may seek professional advice. Past performance is not indicative of future results.

- Full and accurate records must be created and maintained for as long as required for legislative, business and accountability purposes. Records must be captured in an appropriate application.
- Records must only be disposed of with authorisation from the CEO or delegate.

4. Roles and Responsibilities

The CEO is responsible for ensuring the company makes and keeps full and accurate records of its' business activities.

Dealing and Operations Departments are responsible for:

a) Managing recordkeeping activities to ensure compliance with legislative and best practice requirements.To provide you with products and services that you request from us or, where you have consented to be contacted, for products and services that we feel may be of interest to you;
b) Developing and implementing a recordkeeping program for the company, including the development of a recordkeeping framework and disposal program.
c) Developing and implementing recordkeeping training and awareness programs
d) Undertaking disaster preparedness to ensure identification and management of vital records

Managers are responsible for:

a) Ensuring employees under their supervision are aware of their recordkeeping responsibilities and undertake training to ensure records are created and managed appropriately
b) Ensuring that their business area captures records in an appropriate application
c) Developing and implementing recordkeeping training and awareness programs
d) Ensuring that their business area complies with this policy

All employees are responsible for:

a) Creating records of their business activities
b) Capturing records in an appropriate application
c) Ensuring records are kept for the required retention period in accordance with an authorised retention and disposal schedule
d) Securing records from unauthorised access
e) Complying with this policy

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5. Records Retention

The Company will maintain records in their original format for a minimum period of seven years after the transaction date or any other period as stipulated in regulatory or other laws, whichever is higher.

The Company shall treat electronic records with the same requirements as paper-based records. The scanning of paper-based records, and the creation, retention, storage, and disposal of records, using emerging technologies such as cloud-based services will adhere to the same record- keeping standards as paper-based records.

Paper-based records will only be destroyed by a written approval of the board even if they would already have been converted to electronic format. There will be strong safeguards in place for the conversion of paper-based records. The company will comply with the Mauritius Electronic Transactions Act 2000 and Mauritius Data Protection Act.

6. Records Categories

The records shall be kept in accordance to the applicable legislations and shall be:

a) Kept in the English or French language;
b) Kept in writing, stored or otherwise fixed on a tangible medium, or stored in an electronic or other medium which is retrievable in perceivable form; and
c) Kept for a period of at least 7 years after the completion of the transaction to which it relates.

7. Review and approval

This Record Keeping policy shall be reviewed and approved by the board once a year.

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8. References and related documents

Associated policies	• AML Policy • Cybersercurity Policy
References / Statutory references	• Mauritius Financial Service Act 2007 • Mauritius Electronic Transactions Act 2000 • Mauritius Data Protection Act 2017

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