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Akros Index Engineering Incident Management and Record Retention Policy

Akros Index Engineering Inc.

April 2024

v1.0

First Publication Date: April 11, 2024



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1. Overview

1.1. Policy for Incident Management and Record Retention

Akros Index Engineering (“AIE” or the “Company”) is the benchmark administrator for benchmarks that are operated under the Akros Indices brand.

This document illustrates the procedure that is followed when some exceptional incident occurs and how AIE retains the comprehensive records including such events.

2. Incident Management Policy

2.1. Incidents Reporting

All incidents shall be reported to the Product Governance Committee over Telegram Messenger or other real-time reporting systems.

Incident reporting shall happen immediately. Under no circumstances shall an employee delay reporting an incident.

- Irrespective of the time of the day (or night), all known details of the incident shall be provided over Telegram Messenger or other real-time reporting system.
- Once the incident is reported, either of CEO or CTO shall take the incident details as per the format available to them and in turn inform the Product Governance Committee to initiate an investigation immediately.
- Incidents that relate to clients (processes and data confidentiality), shall also be reported by the Product Governance Committee to the Board of Directors.

2.2. Confidentiality

Strict confidentiality is of utmost importance while reporting an incident. All incidents automatically fall under the category of confidentiality with the CEO as the owner of the information.

- The employee shall not discuss the incident with anyone else other than the Board of Directors and Compliance Officer till such time that the Board of Directors or Compliance Officer formally communicates that the incident has been declared public.
- The Board of Directors and Compliance Officer may disclose partial or full details of the incident to other employees or contractors if required for the purpose of investigating the incident or for information purposes.
- Once the incident investigation has been completed, the incident details and the countermeasures of incidents shall be presented to the Board of Directors and Compliance Officer.
- Any press release regarding incidents shall have the CEO's written clearance.
- The Board of Directors and Compliance Officer may also divulge details of incidents to law enforcement or regulatory bodies where required.

3. Records Retention Policy

3.1. Standards

The following standards need to be maintained at all times:

- Index records must be managed in a manner that complies fully with legislative and regulatory requirements affecting their use and retention.
- Index records must have relevant content, context, and format, and must be accurate, authentic, useable, reliable, timely, and well-managed.
- Index records must directly relate to and support a service, function or activity delivered by AIE, and be able to support decision-making.
- Index records must serve the interests of AIE, its employees, and other stakeholders by maintaining high-quality documentation for appropriate lengths of time (at least five years).
- Index records must be managed via systems and processes ensuring efficiency and consistency throughout their lifecycle of creation, distribution, use, maintenance, and disposition.
- Index records must be managed and stored in a suitable format to retain quality, relevance, accessibility, durability, and reliability. Any transfer to another format must have due regard to retaining these qualities.
- Index records must be accessible and retrievable as required to support business efficiency and continuity.
- Index records must be retained or disposed of in compliance with the Records Retention Policy.
- Index records must be subject to clearly defined arrangements for appraisal to select those worthy of permanent preservation.
- Index records must undergo appropriate destruction when no longer required, in an organized, efficient, timely, and (where necessary) confidential manner.
- Index records must be accessible for ensuring prompt and complete responses to requests from regulatory authorities, facilitating their regulatory and supervisory duties.

3.2. Records Retention

Index records must only be kept for as long as is required to meet operational, business, and legal needs. It is a legal requirement established by the Data Protection Act to only retain records containing personal data for as long as is strictly necessary, and organizations can be subject to enforcement action for failing to comply. By having clearly defined procedures for the retention and disposal of records, AIE can demonstrate corporate responsibility in the management of its information and records.

Managers must agree on retention periods for the information assets which they are responsible for. Managers are responsible for ensuring that the

retention periods are regularly reviewed to determine whether any retention periods applying to information within their remit have expired. Once the retention period has expired, relevant action must be taken. Files should be reviewed regularly to ensure records are not kept for too long. If there is no alternative, the entire file should be retained for the longest relevant retention period.

3.3. Records of Disposal

For potentially significant information a record should be kept of what has been disposed of, why it was disposed of, and who authorized it (i.e. the information asset owner), covering both destruction and transfer to the archive. This will ensure there is a transparent audit trail detailing evidence of records that have been destroyed in line with the AIE's stated procedures.

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