



CGPH GROUP RECORD KEEPING POLICY

Document ID	CGPH-POL-007
Version	2.0
Policy Owner	Group Legal & Compliance
Approved by	Director of CGPH Group Ltd.
Applies to	All CGPH Group Companies
Classification	Internal Group Policy
Effective Date	July 1, 2026
Review Cycle	Annual

1. Introduction

CGPH Group Ltd. recognises that accurate, complete and reliable record keeping is fundamental to sound corporate governance, operational efficiency, regulatory compliance and effective risk management.

Business records provide evidence of the Group's activities, decisions and contractual relationships and are essential for protecting the interests of the Group, its clients, investors, counterparties and other stakeholders.

This Policy establishes the principles governing the creation, management, storage, retention and disposal of records throughout the Group.

The Policy shall be read together with the Group Data Protection Policy, Information Security Policy, AML Policy, Whistleblowing Policy and all other relevant governance documents.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



2. Scope

This Policy applies to every company belonging to the CGPH Group and to every director, officer, employee, consultant, contractor, advisor and representative acting on behalf of a Group Company.

It applies to all records created, received, maintained or processed during the course of the Group's business activities, regardless of format or storage medium.

This includes paper records, electronic documents, emails, correspondence, contracts, financial records, client files, transaction documents, databases, audio or video recordings and any other information maintained by or on behalf of the Group.

3. Objectives

The objectives of this Policy are to ensure the integrity, accuracy and reliability of business records.

Support compliance with applicable legal and regulatory requirements.

Protect confidential and commercially sensitive information.

Facilitate efficient business operations.

Promote transparency and accountability.

Support internal and external audits.

Reduce legal and operational risks associated with poor record management.

4. Record Creation

Business records shall accurately reflect the activities, decisions and transactions they document.

Records shall be created promptly and maintained in sufficient detail to support the Group's operational, legal and regulatory obligations.

Personnel shall ensure that information recorded is complete, accurate, objective and capable of being verified where appropriate.

Records shall never be intentionally falsified, manipulated or created in a misleading manner.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



5. Record Classification

Records shall be appropriately classified according to their nature, purpose and level of confidentiality. Classification shall assist the Group in determining appropriate storage, access, retention and disposal requirements.

Confidential records shall receive enhanced protection consistent with applicable legal obligations and internal policies.

6. Record Retention

Records shall be retained for periods consistent with applicable legal, regulatory, contractual and operational requirements.

Where specific retention periods are prescribed by law or regulation, those requirements shall prevail.

Where no mandatory retention period applies, records shall be retained for a reasonable period having regard to the nature of the information and the legitimate interests of the Group.

Records subject to litigation, investigations, regulatory proceedings or legal holds shall not be destroyed until authorised by Group Legal & Compliance.

7. Storage and Security

Records shall be stored securely using appropriate physical and electronic safeguards.

Access shall be restricted to individuals with a legitimate business need.

Appropriate measures shall be implemented to protect records against unauthorised access, loss, alteration, destruction or disclosure.

Electronic records shall be supported by appropriate backup, cybersecurity and disaster recovery measures.

8. Confidentiality

Business records frequently contain confidential, proprietary or personal information.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail: info@cgph.info



Personnel shall protect such information at all times and shall only access records necessary for the performance of their professional duties.

Confidential records shall not be copied, distributed or disclosed without proper authorisation.

Confidentiality obligations continue after the termination of employment or any other professional relationship with the Group.

9. Digital Records

Electronic records shall be managed with the same level of care and integrity as physical records.

Emails, digital correspondence, electronic approvals, databases and cloud-based information systems constitute official business records where they relate to the activities of the Group.

Personnel shall avoid storing business records on unauthorised devices or personal storage platforms.

Electronic records shall remain accessible, authentic and protected throughout their retention period.

10. Record Accessibility

Authorised personnel shall be able to retrieve records efficiently whenever required for legitimate business, legal, regulatory or audit purposes.

Record management systems shall facilitate appropriate access while maintaining confidentiality and information security.

Access rights shall be reviewed periodically to ensure continued appropriateness.

11. Record Disposal

At the end of the applicable retention period, records may be securely destroyed or permanently deleted where permitted by law.

Disposal shall be carried out in a manner that protects confidential information and prevents unauthorised recovery.

Records shall never be destroyed for the purpose of concealing misconduct, avoiding legal obligations or obstructing investigations.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



Where uncertainty exists regarding disposal, guidance shall be obtained from Group Legal & Compliance.

12. Legal Holds

Where litigation, regulatory investigations, audits or other legal proceedings are pending or reasonably anticipated, relevant records shall be preserved until the legal hold has been lifted.

Personnel shall fully comply with any legal hold instructions issued by the Group.

Failure to preserve relevant records during legal proceedings may expose the Group to significant legal and regulatory risks.

13. Information Integrity

The integrity of business records shall be maintained throughout their lifecycle.

Records shall remain accurate, complete and protected against unauthorised modification.

Where corrections are necessary, they shall be made in a transparent manner without obscuring the original information where legally or operationally required.

Audit trails shall be maintained where appropriate.

14. Regulatory and Audit Requirements

The Group shall maintain records sufficient to demonstrate compliance with applicable legal, regulatory and contractual obligations.

Personnel shall cooperate fully with internal audits, external audits, regulatory inspections and lawful information requests.

Records requested during audits or investigations shall be provided promptly and accurately.

15. Data Protection

The processing and storage of records containing personal data shall comply with applicable data protection legislation and the Group Data Protection Policy.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



Personal information shall only be retained for legitimate business purposes and for no longer than necessary.

Appropriate technical and organisational safeguards shall be implemented to protect personal data throughout its lifecycle.

16. Training and Awareness

The Group shall promote awareness of sound record management practices.

Personnel shall receive appropriate guidance regarding their responsibilities under this Policy.

Managers shall encourage consistent record management practices within their respective teams.

17. Responsibilities

Every individual acting on behalf of the Group is responsible for creating, maintaining and protecting accurate business records.

Managers shall ensure that records within their areas of responsibility are properly maintained and managed.

Group Legal & Compliance shall provide guidance regarding legal retention requirements, legal holds and regulatory obligations.

The Board of Directors shall oversee the effectiveness of the Group's governance framework, including record management practices.

18. Breaches of this Policy

Failure to comply with this Policy may result in disciplinary action, contractual consequences or other measures considered appropriate by the Group.

Intentional destruction, falsification, concealment or unauthorised disclosure of business records may constitute serious misconduct and may result in legal or regulatory action where appropriate.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



19. Review

This Policy shall be reviewed periodically to ensure that it remains consistent with the Group's activities, technological developments and applicable legal and regulatory requirements.

Material amendments shall be approved by the Board of Directors of CGPH Group Ltd.

20. Final Provisions

Effective record management is essential to maintaining the integrity, accountability and operational resilience of the Group.

Every individual acting on behalf of the Group contributes to the quality and reliability of the Group's records through the proper creation, management and protection of business information.

By maintaining accurate and secure records, the Group strengthens its governance framework, supports regulatory compliance and protects the interests of its clients, stakeholders and business partners.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

Signature: _____

A handwritten signature in blue ink, appearing to read "Kolyo Boichev", is written over a horizontal line.

Name: Kolyo Boichev

Title: Director

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail: info@cgph.info