

# RECORD KEEPING POLICY

Document Retention and Management

## NIHAO CARBON CERTIFICATES

**Version 1.0**

Effective Date: January 1, 2024

Classification: CONFIDENTIAL

## 1. Purpose

This policy establishes the requirements for creating, maintaining, and retaining records in accordance with MiFID II, MiFIR, MAR, AMLR, and GDPR requirements.

## 2. Record Retention Periods

Record Type	Retention Period	Legal Basis
Client agreements and contracts	5 years after termination	MiFID II Art 16
Transaction records	5 years	MiFIR Art 25
Order records	5 years	MiFIR Art 25
KYC/AML documentation	5 years after relationship	AMLR Art 56
Telephone/electronic communications	5 years	MiFID II Art 16(7)
Suitability/appropriateness assessments	5 years	MiFID II Art 25
Complaints records	5 years	MiFID II
Suspicious Activity Reports	5 years	AMLR

## 3. Record Format

- 3.1 Records must be kept in a medium that allows storage in a form accessible for future reference.
- 3.2 Electronic records must be stored in a format that prevents unauthorized alterations.
- 3.3 Records must be readily accessible to the competent authority upon request.

## 4. Destruction

Records must be destroyed securely after the retention period expires, with destruction documented in a disposal log.