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Introduction

- TorusGatewayFinancialBrokersLLCisaregisteredandlicensedmarketing management services agency specialized in banking and financial services.
- Our products and services include personal Loan, Credit Card, SME, Debt Collection and Recovery Services in the UAE market.
- Our Business is based in Dubai and Our office space is one of the most patronized and prime locations in Bur Dubai. With the best infrastructure and high numbers of accommodation of sales staff.
- Our Company is a client-focused and result driven agency that provides broad-based services such as telesales and Corporate Marketing. We Offer professional Marketing services to all our clients, with an aim to meet and surpass our client's expectations whenever they hire our services. Our Clients best interests would always come first, and everything we do will be guided by our values and professional ethics.
- We will at all times demonstrate commitment to sustainability, both individually and as a firm, by actively participating in our communities and integrating sustainable business practices wherever possible.
- We will ensure that we hold ourselves accountable to the highest standards by meeting our clients needs precisely and completely, by employing professionals who are
- experienced in the industry.
 Our Goal is to position our business to become one of the leading brands in Dubai and also to be amongst the top 10 similar businesses in the UAE within 3-5 years time by 2028 2029



Glance Of Office Photos



Entrance of Building



Reception













Server Room





Current Staff List April 2024

We have 50 staff capacity out of which only 21 staff hired and hiring is going on till 50 staff.

		RUS GATE	l	MOBILE NUMBER	T	
L. NC	NAME	DATE OF JOINING	Eml- Code	WOBILE NOWBER	 Visa Status	
		March 18		971558080156		
1	NEELAVATHI BABU	2024	TR-01		Torus Gateway Visa	
		March 18		971555315443	,	
2	2 OMERIYA	2024	TR-02		Torus Gateway Visa	
	BMEHTABALAM	April 04 2024	TR-03	971586767083	Torus Gateway Visa	
		March 22		971528146064	Torus Gateway Visa	
2	SADIA ALTAF	2024	TR-04		TorusGateway (Labour	
		March 18		971542633904	Card)	
	 WAHEED AKHTAR	2024 March	TR-05	37 13 1200030 1	TorusGateway(Labour	
	SHOBANA	18 2024		971553237083	Card)	
e	SHIVAGURUNATHAN		TR-06	371333137663	TorusGateway(Labour	
				971502116214	Card)	
-	' Shafiullah Syed	 APRIL 20 2024 ⁻	 R-07	3,130211021	TorusGateway(Labour	
	Shahanan Syeu	7.1.1.1.2.0.2.0.2.1		971529010463	Card)	
8	B DHANAVATH PRASHANTH A	 April 04 2024	TR-08	37 1323 010 103	TorusGateway(Labour	
		1		971521245697	Card)	
c	DEEPA SHRESTHA	April 05 2024	TR-09	07-22-2-10007	TorusGateway(Under	
		March 18		971505396022	Process)	
10	FARAZ AKRAM	2024	TR-10	3,1303330022	Own Visa (Labour Card	
		March 18	= 0	971504331960	Pending)	
11	SYED WASIM	2024	TR-11		Own Visa (Labour Card	
		March 18		971556922355	Pending)	
12	MUHAMMAD UMAR	2024	TR-12		Own Visa (Labour Card	
		March 18		971563898773	Pending)	
13	MUHMMAD NADEEM	2024	TR-13		Own Visa (Labour Card	
				971551941359	Pending)	
14	 ABIGAIL ADJEI ADJORKOR A	 April 13 2024 TR-	 14		Under Process	
	KASHAFIRFAN	April052024	TR-15	971527407356	Under Process	
	MIRZAHASSAN	APRIL192024TR		971589045701	Under Process	
	RAMANJEETKAUR	APRIL192024TR		971547561239	0	
	BAYESHAAKBAR	March18	TR-19	971557035637	Cancellation Waiting	

		2024			(Previous employer)
		March 18		971568891368	Cancellation Waiting
19	ABDUL GHAFOOR	2024	TR-20		(Previous employer)
				971525592851	Cancellation Waiting
20	LEOMAR DUERME	April 04 2024	TR-21		(Previous employer)
				971523077974	Cancellation Waiting
21	MUHAMMAD SAFFIL	April 15 2024	TR-16		(Previous employer)



Organizational Chart Flat Hierarchy

Hierarchies are structures that arrange elements in a ranked order, with some elements having greater authority, control, or status than others. Here are some of the common types of hierarchies:

Flat Hierarchy:Flat hierarchies have fewer levels of management and decision-making authority is spread more evenly throughout the organization. This can be a good option for



Mr. Shikher Srivastava (Investor):- A Young

Entrepreneur, Investor, manager and strategies maker. Mr. Shikher Srivastava has a great and successful track record in business investment. He is the sole owner of a solitech company which is just one year old in Dubai and partners in many different companies all around the world. He has almost 7 Years experience in IT business management since 2017.



Mrs Raji Pillai (HR):- With over a decade of

experience in the insurance and education industries, Torus Gateway thrives in the safe hands of our Managing Partner Ms Raji Pillai



Mr. Bijay Rai (CEO):- Decision-making

authority in a company depends on a complex interplay between several factors, play key is to find a balance that empowers employees, fosters agility, and ensures sound decision-making at all levels has a great and successful track record in business investment and partners in many different companies all around the world. He has almost 8 Years experience in IT business management since 2014.



Mr. Fraz Akram (Sales Manager) :- Sales Department is

headed by Mr Fraz Akram, a prominent expert with more than 10 Years experience the the ADCB BANK and He has a proven track record of driving growth and results with innovative sales and Marketing Strategies.



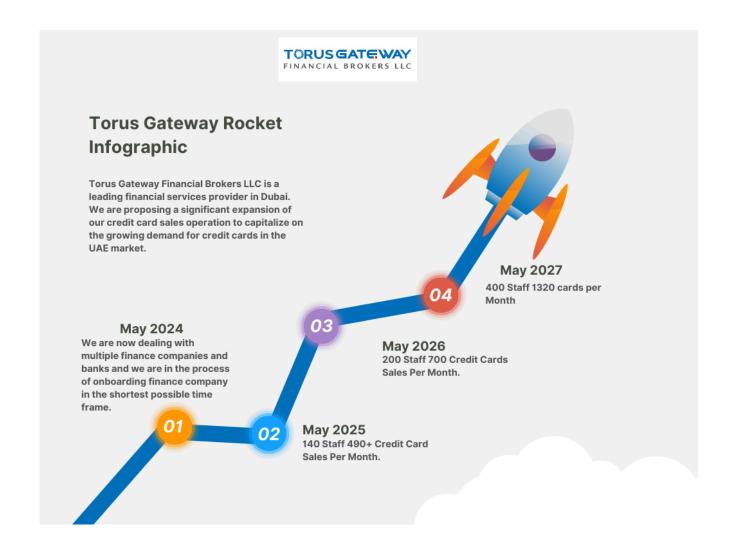
Mrs. Shobhana Shiva (Team Leader): - Mrs Shobhana Shiva

has experience in handling teams for the last 3 Years. Worked as telecaller in a big bank CITiBANK. and many Direct selling agencies. She is excellent in team handling and places significant roles in sales. She is working as Team Leader.

Α	В	С	D	E	F	G	Н
Table	Jul-24	Aug-24	Sept-24	Oct-24	Nov-24	Dec-24	Total
Head Count-Card Sales Staff	20	25	30	30	35	40	40
Cards Productivity	4	4	4	4	4	4	
Business Achievement							
Submission	150	250	300	300	350	400	1750
Approval	60	100	110	110	120	150	650
Booked Deem Cards	50	80	100	100	110	130	570



Torus Gateway Financial Brokers LLC



TORUS GATEWAY COMPLIANCE POLICIES

The objective of our compliance policy is to ensure compliance risks are identified, and adequately mitigated. The Group seeks to reduce compliance risks taking into account the nature, scale and complexity of the business.

This is in alignment with the group strategy and The essence, which sets the Group's vision to be recognized as the most trusted financial partner, and is deeply connected to treating customers fairly and conducting business with high integrity.

In order to ensure appropriate risk management, the group has established three lines of defense and control governance model:

- i) Business units and group functions constitute the 1st line of defense, and have primary responsibility for identifying, managing and mitigating the group's compliance risks by having sufficient control in place.
- ii) Group compliance is an independent risk control function headed by the head of group compliance and constitutes the 2nd line of defense for compliance risk. Group compliance is responsible for having an independent oversight of the group's compliance risks, by performing risk assessment, monitoring activities, advisory work and providing independent reports to senior management. Additionally, Group compliance servers as the Group Data Protection Officer(DPO) function and the Designated Group Conflicts Officer (DGCO) function.
- iii) Group Internal Audit Constitutes the 3rd Line of Defense and is responsible for auditing both the 1st and 2nd line of defense in terms of validating that a robust framework is in place, sufficiently implemented and assessing the effectiveness of internal controls.

TORUS GATEWAY CODE OF CONDUCTS AND CONFIDENTIALITY (DO'S AND DON'TS)

Do's

Always identify yourself and inform the consumer that you are acting as an agent on behalf of bank

Give accurate information to customer on products and services

Keep all documents, bank stamps, letterheads and security items in safe custody-follow clean desk policy

Make sure bank issued TAB gallery is clean and empty at all times

Make sure you are doing your due diligence for all cases

Please be polite on the floor and handle any grievances inside a meeting room

Always explain Key T&Cs including cooling off period, benefits, warnings; risks including any fee charges associated with the products and services

Solicit only bank approved financial promotions involving any kind of bonus, gifts points or other incentives.

Always ask the customers to fill in the application forms, ,only if requested by the customer, officer may fill in the form to assist in customer's presence

Perform identity verification through valid documents as per bank's policy

Obtain self-attestation from the consumer on all documents provided by the consumer

Conduct the original sighting process personally

Adhere to a clear desk policy and shred/dispose of any unwanted consumer documents to avoid any potential misuse.

Don'ts

Indulge in any form of discrimination, abuse, and harm con: regardless of family status, gender minority group status, age.

Make false promises or offer bonus/gifts to a, which not approved by the bank

Hold customer's documents and information

collect any KYC documents on WhatsApp or use social media channel while communicating with customers

Collect documents on behalf of someone else

Use abusive language

Leave customer signed documents and customer data unattended at any place

Offer, give, solicit accept any personal gifts or rewards from consumers in accordance with the bank's gift and entertainment policy.

Obtain signatures on blank, partially filled application forms and blank security cheque.

Engage in financial transactions with consumers or in any form of partnership which may result in conflict of interest.

Use personal email and social media channels while communicating with consumers.

Share consumer Information with any third party including family members, colleagues friends etc., without appropriate consent from the customer.

Coerce the consumer to switch the relationship if he/she is already in touch with another staff or channel for applying for the financial product service.

Zero Tolerance" culture for AML / KYC policy slippages.

Vigilance on 100% application is conducted to maintain quality of sourcing and maintain risk of over commitment or misrepresentation.

All customer communications are approved by legal and compliance of the bank. All social media contacts and marketing are restricted for all staff without the permission of the bank.

All Customer documents should be keep in side the chub only, all customer documents are safe and unwanted documents should be trashed

All customer communications are approved by legal and compliance of the bank. Email is restricted for staff .

Staff record maintained includes hiring documents, performance, evaluation and training.

Salary and incentive are paid to staff on exact dates every month without delay. Process is managed by the administration department.

All TorusGateway staffs are strictly follow the DO's & DON'Ts of the company Professional recruitment process with all mandatory fields.

Crisis Management Program

Crisis Management Program

Torus Gateway Financial brokers LLC designs and delivers a series of independent cyber security simulations to test an organization's cyber incident response, business and board crisis management procedures when faced with a cyber focused disruption scenario.

What is Crisis Management?

In an increasingly volatile business environment, organizations not only have to prepare for crises, but expect them. An organization's ability to not only detect incidents and crises as they occur, but effectively respond to and recover from them is increasingly under scrutiny.

An organization's crisis management framework (CMF) is the foundation which enables escalation, communication and co-ordination during a crisis. It also provides the structure through which to train and exercise stakeholders with crisis management responsibilities. Exercises leverage tailored risk-based scenarios designed to simulate the pressures on and expectations of individuals and the organization, during a crisis.

A Crisis Management Program allows our organization to:

Develop a series of independent cyber security simulations to test their cyber incident response, business and board crisis management procedures when faced with a cyber focused attack.

Develop an exercising capability that includes a governance structure and related processes to periodically test their cyber incident response.

Design fit for purpose reporting mechanisms for the business and the board.

Test the response and recovery capabilities

across multiple business lines and geographies by conducting several exercises over a number of predefined months

Benefits of a Crisis Management Program

- Validatetheeffectivenessofresponsestrategiesinasafe,simulatedenvironment
- Buildcapabilityamongsttheindividualsexpectedtorespondtoacrisis
- Empowerkeystakeholderstoknowwhentoactandhowtoactduringacrisis
- Buildcomfortaroundhowtorespondtoanumberofdifferentcrises
- Improved visibility of risks and mitigating actions taking place
- Identifygapsinbusinessprocessesbeforeitistoolate

Without a thoroughly tested, coordinated response to cyber crisis, no organization can be confident in its future projections, given the nature of operating as a business is increasingly fraught with cyber peril.

With a wide variety of available exercises, KPMG is perfectly placed not only to prepare an organization for the worst, but also to ensure confidence amongst shareholders and employees of sufficient preparation to mitigate the most serious regulatory penalties.

Outcomes from a Crisis Management Program can be used as a guide to future strategy development to help an organization protect themselves against cyber risks, defend against and limit the severity of attacks, and ensure its continued survival despite a disruption to critical business processes.

Risk Management Strategy for Torus Gateway

At Torus Gateway, we understand the dynamic landscape of direct selling and the potential risks involved. To empower our distributors and ensure the company's continued success, we have a robust risk management strategy in place.

Here's a closer look at some key elements:

1. Compliance at the Forefront:

- Regulatory Expertise: Westayaheadofthecurvebyactivelymonitoringandadhering to all relevant direct selling regulations, encompassing consumer protection, product safety, and anti-pyramid scheme legislation. Training programs ensure our distributors are well-versed and operate ethically.
- UnwaveringEthics:Aclearlydefinedcodeofethicsguidestheconductofallour distributors. This emphasizes fair marketing practices, truthful product representation, and avoiding any misleading income claims.

2. Protecting Our Reputation:

- Quality You Can Trust: Weimplementrigorousqualitycontrolmeasuresandadhereto
 the highest safety standards for all our products. This minimizes the risk of
 product-related incidents that could damage our reputation and our distributors' trust.
- EmpoweringResponsibleConduct:Clearpoliciesandproceduresaddressany unethical or misleading conduct by distributors. This may involve disciplinary actions or contract termination if necessary.

3. Financial Security for All:

- Financial Literacy Training: Weoffercomprehensivetrainingprogramsthatequipour distributors with financial literacy skills and responsible business practices. This empowers them to manage their finances effectively and avoid debt-related issues that could reflect poorly on Torus Gateway.
- InventoryOptimization:Wemaintainanefficientinventorymanagementsystem to minimize the risk of overstocking or stock outs for our distributors. This ensures they have the products they need to succeed without unnecessary financial burdens.

4. Operational Excellence:

 Data Fortress: Robustdatasecuritymeasuressafeguardcustomerinformationand ensure compliance with data privacy regulations. This builds trust and protects both distributors and customers. PreparedforAnything:Wedevelopcomprehensivebusinesscontinuityplansto address potential disruptions like natural disasters or technological outages. This minimizes downtime and ensures our operations continue smoothly.

5. Communication and Continuous Improvement:

- Regular Risk Assessments: Weconductregularriskassessmentstoidentifyemerging threats and proactively update our strategies to address them.
- Open Communication Channels: Wefosteropencommunicationwithourdistributors.
 They can freely raise concerns and report any potential risks, creating a collaborative environment for continuous improvement.

By implementing this multi-layered approach, Torus Gateway strives to create a safe and ethical ecosystem for our distributors to thrive. This not only protects our reputation but also fosters long-term success for everyone involved.

Additional Considerations:

- Risk Appetite: Weestablishaclearlydefinedriskappetitethatoutlinesthelevelofrisk we are comfortable with while pursuing our business goals.
- Tailored Mitigation Strategies: Dependingontheidentifiedrisk, weemployvarious strategies like avoidance, reduction, transfer (e.g., insurance), or acceptance.

This is a general overview, and specific details of our risk management strategy may adapt based on the products we offer, our target markets, and the regulations in our operating regions.

Business Continuity

What is Business Continuity?

Business Continuity capabilities are an organization's ability to protect and sustain critical business processes during a disruption. Effective business continuity management (BCM) ensures that firms are equipped with the ability to prevent, respond to and recover from various operational disruptions.

We Deliver end-to-end business continuity, IT Disaster Recovery and resilience services, with targeted review and assessment of existing capabilities to provide a road-map for improvement.

Why do organizations need it? At Torus Gateway, we understand that downtime can be detrimental to your business. Beyond just financial losses, disruptions can damage your reputation and operational efficiency.

Imagine delays in fulfilling orders or limited access to customer service due to a technology outage. These scenarios can quickly erode customer trust and hinder your ability to operate effectively.

That's why we prioritize building resilience. We have a comprehensive program in place to prevent, detect, and respond to disruptions, ensuring the swift recovery of critical IT services and core business functions.

This proactive approach safeguards your operations, protects your reputation, and empowers you to navigate challenges with minimal impact.

By being resilient, you can ensure business continuity, protect your bottom line, and navigate the ever-changing marketplace with confidence.

Deep Dive into business Continuity at Torus Gateway

Building on the foundation of our Business Continuity Strategy, here's a more detailed look at how we ensure uninterrupted success for our distributors:

1. Comprehensive Business Continuity Plans (BCPs):

- ThreatIdentification:Weconductthoroughriskassessmentstoidentifypotential threats that could disrupt operations. This includes natural disasters like floods or earthquakes, technological outages like cyberattacks or power failures, and even pandemics.
- ImpactAnalysis:Foreachidentifiedthreat, weanalyzethepotential impacton different aspects of our business. This includes distributor operations, customer service, data security, and financial transactions.
- DetailedRecoveryProcedures:OurBCPsoutlinespecificstepsforrecoveringfrom each disruption. These procedures address data restoration, system recovery, communication protocols, and alternative work arrangements.

ResourceAllocation:Weidentifyandallocatenecessaryresourcesforeachrecovery procedure. This includes personnel, equipment, and financial resources to ensure a swift and effective response.

2. Prioritizing Critical Functions:

 Essential Services: Our BCPs prioritize the continuity of essential services for 	
distributors. This may include:	
 Accesstoonlinesalesplatformsandorderprocessingsystems. 	
 Customerservicesupportchannels,evenifthroughalternativemethodslikeemail 	
or social media.	
 Secureaccesstotrainingmaterialsandresourcesfordistributors. 	
PhasedRecovery:TheBCPsmayoutlineaphasedrecoveryapproach.Critical	
functions are restored first, followed by non-essential services, ensuring a smooth and	
efficient return to normal operations.	

3. Communication is Paramount:

- EarlyWarningSystems:Weimplementearlywarningsystemstodetectpotential disruptions and take proactive measures to mitigate their impact.
- Multi-ChannelCommunication:Ourcommunicationprotocolsutilizevariouschannels to reach all stakeholders, including distributors, customers, and employees. This may involve emails, SMS alerts, social media updates, and dedicated hotlines.
- TransparencyandRegularUpdates:Weemphasizetransparencyincommunication. Regular updates keep everyone informed about the situation, the recovery efforts, and the expected timeline for restoring normal operations.

4. Investing in Resilience:

- CybersecurityMeasures:Robustcybersecuritymeasuresprotectoursystemsanddata from cyberattacks. This includes firewalls, data encryption, and employee training on cyber hygiene practices.
- Data Backup and Replication: We implement a comprehensive data backup and replication strategy. Data is backed up regularly and securely stored in geographically dispersed locations to minimize data loss risks.
- AlternativeWorkArrangements:OurBCPsexplorealternativeworkarrangementsfor distributors and employees. This could involve remote work options, allowing operations to continue with minimal disruption.

5. Continual Improvement:

- RegularTestingandDrills:WeconductregularBCPsimulationstotesttheir effectiveness and identify areas for improvement. These drills involve various scenarios and ensure all personnel are familiar with their roles and responsibilities.
- LessonsLearnedAnalysis:Followinganydisruptionordrill,weconductathorough lessons learned analysis. This helps us identify weaknesses in our BCPs and make necessary adjustments to improve our preparedness for future events.

By implementing these detailed measures, Torus Gateway prioritizes business continuity and empowers our distributors to navigate unexpected challenges with minimal impact on their success. We are committed to fostering a resilient and adaptable business environment that ensures long-term growth for everyone involved.

Employee Exit Form TORUS GATE WAY **Employee Termination Checklist Employee** Date April 17, 2024 Department Each of the items below must be returned or completed upon termination and before issuance of final pay check. Return Complete Company Equipment **Exit Interview ID Badge Expense Reports** Company Credit Cards **Termination Form** Petty Cash Advances Confidentiality Report Expense Accounts Benefits Review Desk and File Keys Final Timesheet Keys to Premises Catalogs and Sales Materials Vacation reconciliation Sample Products Company Automobile **Company Documents** Other: Software Comments Signature of Supervisor

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