QRG Investments and Holdings Limited

Business Continuity Policy

Version 3.0

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2.0	February 06, 2024	As per RBI Master Direction, Nov, 23.	February 06, 2024
3.0	February 06, 2025	Review in line with ISO 27001:2022	February 06, 2025

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1. Policy Statement/Overview

QRG Investments and Holdings Limited (QRGIHL) Business Continuity Program employs a shared management process where the objectives are to identify potential risks and business impacts that threaten an organization and provide a framework for building resilience into the business model. This approach allows for an effective response that safeguards the interests of our stakeholders, reputation and brand.

The Business Continuity Program interacts closely with Crisis Management & Incident Response processes, as well as other specialized processes including IT Disaster Recovery, to address the coordination of the company's initial response to a crisis or incident in an effective and timely manner, with the goal of avoiding harm to people and minimizing damage to the organization's profitability, reputation and ability to operate.

Together these disciplines define the structure and the tools that are used to ensure resiliency and ultimately overcome the potential or actual impact of crisis.

2. Scope

Ownership, oversight and governance of the Business Continuity Program is with CIO under the guidance of IT Strategy and Steering Committee. Compliance with this policy is required of all employees of QRGIHL including all affiliates, and all external contractors providing services to or for QRGIHL.

Responsibility for developing, implementing, maintaining, testing, and executing the Business Continuity Program belongs to the Business Groups with assistance from the IT Team/Managed service partner.

3. Definitions/Procedures

- **Business Continuity:** Planning for the continued delivery of products or services at acceptable predefined levels following disruptive incident.
- **Business Continuity Plan:** Documented procedures that guide to respond, recover, resume, and restore to a predefined level of operation following a disruption.
- **Business Impact Analysis (BIA):** Process of analyzing activities and the effect that a business disruption may have upon them. Identifies business processes performed and determines the impact of not being able to perform them as a result of a business outage. Identifies resources (e.g., staffing, applications,

equipment, etc.) required to support business processes. Identifies locations where the process is performed at and staffing levels needed based on process criticality.

- **Crisis/Incident Management:** Overall coordination of response to a crisis, in an effective, timely manner, with the goal of avoiding harm to people, and minimizing damage to the organization's profitability, reputation, and ability to operate.
- **Disaster Recovery:** Planning activities associated with continuing availability and restoration of the IT infrastructure.
- **Policy Maintenance:** The policy will be reviewed atleast every year and approved by Board/ Committee. Immediate necessary changes will be reviewed, approved and implemented as identified, and non-cycle changes will follow normal approval processes for policy refresh.

4. Ownership/Responsibility

The Whole-Time Director and CIO are responsible for administering this policy and is authorized to approve any exceptions to the policy.

While the Business Continuity Policy establishes that all employees play a role in business continuity, it defines clear responsibilities in planning within the company structure as indicated below:

- Senior Business Leaders are responsible for allocating resources in support of Business Continuity (BC) Planning initiatives and the Business Continuity Policy.

- Plan Owners are responsible for the Business Group Business Continuity Plan development, implementation, maintenance, testing and execution.

5. Compliance

Business Continuity Plans must be documented including the following:
- **Organization Details** – Mission statement and general description of the main short and long- term Recovery Strategies.
- **Business Impact Analysis (BIA), which includes:**
  - ➢ Identification of business processes performed with indication of relative criticality and the impact of not being able to perform them.
  - ➢ Identification of locations in which the process is performed, and staffing levels needed based on process criticality.
  - ➢ Identification of organizational and technological (application) dependencies, including if applicable, alternate procedures to support services/application disruptions.

General Contingency Procedures outlining the overall generic steps involved in the Response, Recovery, Resumption and Return Phases, and in any other specifically applicable scenario.

Business Continuity Plans must be reviewed, validated and approved once each financial year. Business Continuity Plans must be tested in accordance to their Recovery Strategies at least once each financial year.

Refer : IT continuity Policy

6. **Document Management**

- Any amendment to this policy/ procedure or issue of any guidance or circular etc. under this policy/ procedure has to be incorporated in the policy on an ongoing basis by the Management.
- This policy will be reviewed atleast every year by the Board/ Committee.
- This procedure replaces any other procedure issued earlier by the Company to the extent specifically covered here. This policy should be followed both in letter and spirit.
- The Company is committed to continuously reviewing and updating policies and procedures- based on the Company's risk assessment and incorporating any regulatory requirement as maybe required.
- Any amendment to this procedure or issue of any guidance or circular etc. under this procedure has to be approved in writing by the approving authority.

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