

Global Business Continuity Management Policy

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Version	Process Owner	Reviewed by	Approved by
Ver 1.3	Vishwanath Rao	Venugopal Mudhaliar	Venugopal Mudhaliar

Table of Contents:

1. INTRODUCTION	3
2. SCOPE	3
3. SCOPE EXCLUSIONS	4
4. GOALS AND OBJECTIVES	4
5. RESILIENCE COMMITMENT	6
6. GOVERNANCE	7
7. COMMUNICATION	7
8. ENFORCEMENT AND VIOLATION	8
9. REVIEW AND MAINTENANCE	8
ANNEXURE A – INFORMATION CLASSIFICATION DETAILS	9
ANNEXURE B – VERSION HISTORY (CHANGES SINCE LAST VERSION)	10

1. INTRODUCTION

1.1 PURPOSE

The purpose of this Business Continuity Management Policy (“BCM Policy”) is to ensure that the products and services Firstsource Solutions Limited and all its global subsidiaries (collectively “Firstsource”) provides continue to be delivered to our customers at contractually agreed levels during operational disruption and are in line with ISO 22301 standards. Firstsource, through this policy, will support its corporate strategy of meeting organizational objectives through the continued delivery of operations as committed to its Clients.

Firstsource’s growth is built on the trust that its clients and business communities have placed in Firstsource’s best practices. It is therefore necessary that Firstsource’s services and infrastructure are capable of effectively sustaining any eventualities occurring due to actual or potential threats (both internal and external) that are likely to have an adverse impact on business as usual.

Firstsource is committed through this policy to proactively:

- a. Plan, establish, implement, operate, monitor, review, maintain and continually improve on its BCM framework and commit to satisfy applicable requirements in line with ISO 22301:2019 standard framework, by having a process driven and documented Business Continuity Management System (BCMS)
- b. Ensure the continuity of its prioritized services and/or products including the activities that support them
- c. Meet and continue to manage the expectations of interested parties such as auditors, Board, Clients or Vendors as relevant for managing the Business Continuity Program

2. SCOPE

2.1 Scope Statement:

The provision of transformational solutions and services spanning the customer lifecycle across Healthcare, Banking and Financial Services, Communications, Media and Technology and other industries (of Business Process Outsourcing services) and associated corporate support functions comprising of IRM, Human Resource, Quality and Training, Legal and Compliance, Administration and Facilities, Physical Security, Technology, and Corporate Communications.

2.2 This policy applies to:

2.2.1 Personnel

All Firstsource staff, contract, vendors, sub-contractors and key interested parties, such as auditors, Board, Clients or Vendors as relevant for managing the Business Continuity Program personnel working out of Firstsource offices across all its locations in India, Philippines, UK, USA and Mexico.

2.2.2 Infrastructure and information processing systems

All Firstsource infrastructure, technologies, applications and other information processing systems that are required to deliver critical services to its customers.

2.3 Compliance with the policy, standards and certification

Firstsource shall be compliant with ISO 22301 standards and based on the client and/or contractual requirements, some of the centers will undergo ISO 22301 Certification. This strategy shall be fully integrated into all our clients’ day-day operations and shall work in conjunction with other organizational policies and applicable regulations.

3. SCOPE EXCLUSIONS

All client offices from where Firstsource provides services are excluded from the BCMS scope.

Exclusions from this policy are:

<i>Exclusions</i>	<i>Reasons for exclusions</i>
Recovery of client/customer managed infrastructure hosted within Firstsource facilities;	Firstsource does not have control over client managed infrastructure
Operations and recovery managed by client from their site;	Firstsource does not have control over client’s site
Processes/sub-processes not having Firstsource Operations accountability;	Firstsource is not accountable for processes and sub-processes that are not included in the scope of work agreed with its clients;
Merger and Acquisition entities until integration;	Firstsource would implement ISO 22301 framework only after integration
Processes/sub-processes with 3 or less staff	Any processes and sub-processes that do not have 4 or more staff in Firstsource would come under the Standard plan unless otherwise specified by the Client or business

4. GOALS AND OBJECTIVES

Following is Firstsource’s BCM Goal:

“Set-up a best-in-class Business Continuity Management Systems(BCMS) for our clients ensuring optimal response, as per the agreed targets of process and service criticality and build resilience to threats and attacks severely impacting our continuity of service thereby securing the safety of humans, assets as well as company’s reputation.”

Firstsource is poised to achieve the above goal statement through the following objectives:

1. Ensure a harmonized approach to Business continuity management across all Business Departments
2. Ensure all our clients are resilient against major failures, disasters, and attacks

3. The entire BCMS shall apply to Firstsource's Hyderabad center and may include other offices as required by the business and clients. While the Hyderabad center is certified on ISO 22301:2019, the framework would be extended to all operating offices in a phased manner for consistency
4. Details on implementation and maintenance of a robust BCMS at Firstsource is documented in a separate manual called "Firstsource's BCMS Manual"
5. Design, develop, manage and govern a Business Continuity Management System (BCMS) Framework
6. Meet and continue to manage the expectations of interested parties such as auditors, Board, Clients or Vendors as relevant for managing the Business Continuity Program
7. Design and institutionalize the BCM processes holistically across the Business Units and Geographies and corporate functions based on a pre-defined BCM criteria
8. Develop strategies, plans and procedures to ensure resumption, recovery and restoration of prioritized services, in a structured manner until return to normalcy (BAU)
9. Develop and implement an effective testing and exercise program as per the BCM Process Document
10. Conduct periodic reviews annually or whenever significant change(s) take place
11. Establish and implement an incident management program to manage an effective response during a disruption
12. Develop a business continuity awareness and training program to spread the awareness of BCM culture across Firstsource's organisation and as applicable to relevant BCM roles within the organisation
13. Adhere to and comply with applicable legal, statutory, regulatory and contractual obligations of the business

5. RESILIENCE COMMITMENT

Firstsource commits to ensure availability of its critical equipment, services, personnel, suppliers, infrastructure and applications to its relevant stakeholders and to continue its critical and essential business operations during a disruption of a disaster as contractually agreed with the client.

Firstsource understands that any disruption to the operational activities of our client may have significant and wide impact on the returns to their investors. In its pursuit to become a partner of choice that values excellence, discipline and inspiration, Firstsource is committed to implement and maintain BCMS Policy to support holistic program for business continuity thereby enabling resilience. The purpose of this policy is to effectively prepare for and respond to any major disaster or crisis faced by the organization with a focus on achieving its strategic goals. During such disruptions, BCMS ensures continuity of all critical business operations, thereby enabling our clients in meeting their internal and external stakeholder commitments, legal, regulatory and contractual obligations.

Firstsource shall take all required steps to ensure:

- Safety, protection and wellbeing of its employees, contract workers and customers
- Safety and protection of its assets
- It is resilient against major business disruptions like disasters, pandemics, attacks and failures
- A harmonized and consistent approach to BCM throughout the organization
- A leader of BCM practice with proven maturity and a role model for other organizations
- Align our technological priorities, capabilities, readiness and availability to the business requirements
- Actively build and embed a business continuity culture through awareness and training activities
- Allocate necessary resources and funding for driving BCMS

Corporate Recovery Parameters:

- Recovery Time Objective (RTO) and Recovery Point Objective (RPO) are essential business metrics for our internal teams to ensure continuity of operations with minimal business impact
- We target to maintain a standard recovery time objective (RTO) of 48 hours and the Recovery point objective (RPO) of 5 business days for the recovery of internal data unless a lower minimum is provided by any of our clients/regulators in respect of any particular account which may be agreed mutually between the clients and all internal Firstsource stakeholders

6. GOVERNANCE

- The policy implementation responsibility rests with the pre-defined roles as described in the BCM Roles and Responsibilities in the BCMS Framework/Procedures/documents that shall be read along with this Policy
- The Global BCM Head is responsible for overall alignment of BCM objectives by
 - a. Integrating with other corporate functions/management system initiatives, to leverage the commonalities for effectiveness and sustenance
 - b. Taking reasonable decisions post consultation with the appropriate stakeholders (as relevant) to invoke BC and communicating it to the right business stakeholders during and post disruptive events
 - c. Reviewing potential threats that may lead to trigger a situation to invoke BC
 - d. Driving reviews on the overall performance and governance of the BCM
 - e. Ensuring periodic evaluation, monitoring of effectiveness of BC requirements
- To achieve the aforementioned objectives, the Global BCM Head shall be supported by the Global BCM team
- The Business units and corporate functions shall seek necessary guidance and advisory from the corporate BCM team for adherence and compliance to this BCM Policy and Framework globally

7. COMMUNICATION

FIRSTSOURCE BCM TEAM shall ensure that the BCMS Policy is accessible to all internal staff through the link <https://www.firstsource.com/esg/governance/> and is communicated to the third parties such as, suppliers, contractors, customers and other external stakeholders as necessary. The communicating channels would be at the discretion of the BCMS leader (to be designated in the BCM Process Document) and can be on emails, townhall meetings, leadership messages, training, awareness, induction programs, posters, printed media, Intranet etc.

8. ENFORCEMENT AND VIOLATION

The Crisis Management Steering Committee (CMSC) along with the Cluster heads are responsible for ensuring the enforcement of this policy across Firstsource operations.

Any activity resulting in non-compliance with this policy would be considered as a violation. Violations to this policy shall result in disciplinary action, which will be consistent with the severity of the incident as determined through an investigation. Serious violation may result in major disciplinary actions, including termination of employment / services / business relationship.

9. REVIEW AND MAINTENANCE

This Business Continuity Policy shall be reviewed when significant changes occur in the organization or at least on an annual basis.

ANNEXURE A – INFORMATION CLASSIFICATION DETAILS

Classification: Firstsource Restricted

Information Owner (IO): Operations risk and Business continuity team

Information Custodian (IC): BCM team

Authorization List (AL): All employees, Existing/Prospective Clients.

Declassify on: Never

ANNEXURE B – VERSION HISTORY (CHANGES SINCE LAST VERSION)

Date	Version Number	Changes made
	Draft 1.0	Draft copy
31/05/2022	Draft 1.1	Legal inputs incorporated
20/06/2022	Draft 1.2	Corporate Communications inputs incorporated
21/06/2022	Ver 1.0	Initial release
13/01/2023	Ver 1.1	Heading of section 5 changed to avoid duplicates and the section condensed First release
12/01/2024	Ver 1.2	Reviewed the document and updated <ul style="list-style-type: none"> • Updated the names on Page 1 • Section 4.3 with certification of Hyderabad centre • Section 7 with the Policy link
22/01/2024	Ver 1.3	Updated the following <ul style="list-style-type: none"> • Exclusion criteria of BC plan in Section 3 • Corporate Recovery parameters in Section 5