BUSINESS CONTINUITY POLICY

The Board of Directors and management of Exclusive Markets ltd, located at Suite 18, Third Floor, Vairam Building, Providence, Mahé, Seychelles, which operates in Financial Services sector, are committed to preserving the continuity of Exclusive Markets ltd processes, products, services and other functions in the face of disruptive incidents in order to preserve its competitive edge, cash-flow, profitability, legal, regulatory and contractual compliance and commercial image and in line with the requirements of the Seychelles Financial Services Authority (FSA)

To satisfy applicable legal, regulatory and contractual obligations, and reduce operational (continuity-related) disruption risks to acceptable levels, a business continuity management system (BCMS) will be implemented.

Exclusive Markets ltd current strategic business plan and risk management framework provide the context for identifying, assessing, evaluating and controlling continuity-related risks through the establishment and maintenance of a BCMS. The business impact analysis, risk assessment and risk treatment plan identify how continuity-related risks are controlled.

Exclusive Markets ltd aims to achieve specific, defined business continuity objectives, which are developed in accordance with the business objectives, the context of the organisation, the results of risk assessments and the risk treatment plan. These objectives are recorded in the Assurance Programme (BCMS Objectives tab – BCMS REC 9.1).

Individuals that have specific responsibilities in terms of the BCMS are identified in the Document Management and Roles Tool and the Head of HR is responsible for ensuring that the detailed BCMS requirements of individual roles are contained in their job descriptions and reflect obligations for critical functions essential to client service, operational continuity and regulatory compliance.

All Employees of Exclusive Markets ltd and certain external parties identified in the BCMS are expected to comply with this policy and with the BCMS that implements this policy. All Employees, and certain external parties, will receive appropriate training. The consequences of breaching the business continuity policy are set out in the disciplinary policy, and in contracts and agreements with third parties.

Exclusive Markets ltd is committed to the continual, systematic review and improvement of the BCMS.

Exclusive Markets Ltd has established a top-level management steering group, the Business Continuity Committee, chaired by a Director and composed of senior representatives, including the Chief Information Security Officer (CISO), MSO, DPO, CIO, the Business Continuity Manager and other relevant executives (as the case may be from time to time), to support the BCMS framework and to periodically review this policy.

Exclusive Markets ltd is committed to achieving alignment of its BCMS to ISO 22301:2019.

This policy will be reviewed to respond to any changes in the risk assessment or risk treatment plan and at least annually or following any material operational or service disruption. Significant disruptions will be reported to the FSA where required.

In this policy, ‘business continuity’ is defined as the “capability of the organization to continue delivery of products or services at acceptable predefined levels following disruptive incident” (ISO 22301:2019, Clause 3.3).

The BCMS is the Business Continuity Management System, of which this policy, the Business Continuity Manual (the Manual’), the Business Continuity Plan (BCP) and other supporting and related documentation is a part, and which has been designed in accordance with the specification contained in ISO 22301:2019.

A **disruptive incident** is any situation that might be or could lead to a disruption, loss, emergency or crisis, affecting critical operations, service availability, client services or regulatory compliance.