

## BUSINESS CONTINUITY MANAGEMENT POLICY

ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) is committed to providing its stakeholders with an operational and administrative Business Continuity Management System (**BCMS**), including policies, procedures, and action plans addressing availability risks through various controls. ARA Group's BCMS is designed to ensure the long-term viability of ARA Group is maintained in the event of an interruption to critical business operations.

### 1. PURPOSE

The Business Continuity Management Policy establishes the business continuity management for ARA Group endorsed by the Executive Management (**BCM Policy**). This BCM Policy ensures that ARA Group and its associated entities implement and maintain plans and procedures to detect, prevent, minimise, and manage the impacts of incidents. This BCM Policy supports ARA Group's continuity objectives to ensure operational resilience as part of the BCMS.

### 2. SCOPE

This BCM Policy applies to all permanent and temporary employees (full or part time), directors, officers, personnel, contractors, partners, service providers of ARA Group together with all third parties acting on ARA Group's behalf or representing ARA Group's interests, such as agents and consultants or other people authorised to work on ARA Group's premises, or access ARA Group's facilities, systems, or information (collectively referred to as **Employees and Third-Party Personnel**). All Employees and Third-Party Personnel must abide by this BCM Policy and related procedures. Information concerning this BCM Policy, and its implementation must be communicated to all ARA Group's personnel by the Senior Management.

### 3. DEFINITIONS

3.1. **Board of Directors** means the board of directors ARA Group Limited ABN 47 074 886 561.

4. **ARA Group Divisions** including but not limited to ARA Electrical, ARA Building Services, ARA Fire and Security, ARA Products, and ARA Indigenous Services.

4.1. **Business Impact Analysis (BIA)** means the process of determining the criticality of business processes and associated information assets for continuity of business operations during and after a business disruption.

4.2. **Business Continuity Management (BCM)** means the practice of planning, building, running and governing activities to ensure ARA Group:

- (a) identifies and mitigates operational risk leading to business disruptions before they occur;
- (b) prepares for and responds to disruptive events; and
- (c) restores ability to deliver key processes to an agreed level within an agreed time following a disruption.

4.3. **Disruptive Events** means events such as loss of office access, infrastructure, system access, human resources, external dependencies etc. caused by disaster scenarios such natural disasters, fires, terrorist attacks, political unrest, power disruption, sabotage, hardware failure, cyber-attacks, telecommunications failures, pandemics, loss of key staff members, loss of critical suppliers etc.

4.4. **Emergency response planning** means the formal processes to respond to disaster scenarios affecting access or safety with ARA Group company offices.

4.5. **Executive Management** includes the ARA Group Chief Executive Officer and the Chief Financial Officer.

4.6. **IT Disaster Recovery (ITDR)** means the formal processes to respond and recover from a disruption event that negatively impacts information assets and information processing facilities.

4.7. **Senior Management** includes the ARA Group's managing directors who are responsible for the day-to-day operations of the ARA Group Divisions.

4.8. **Steering Committee** refers to committee consisting of Senior Management, ARA Group's General Counsel, Chief Technology Officer, Information Security Manager and Corporate Administrator.

## 5. **POLICY REQUIREMENTS**

### 5.1. **Leadership Commitment Statement**

The Board of Directors and Executive Management consider the operational availability of its critical and essential business processes as fundamental to the success of ARA Group companies. The Executive Management provides, and will continue to provide, the resources required to establish, implement, maintain, and continually improve its BCMS appropriate to each of the businesses.

Approval of this BCM Policy and subsequent approval of topic-specific sub-procedures and plans by Executive Management demonstrates ARA Group's leadership commitment to business continuity management.

### 5.2. **Business Continuity Objectives**

The Senior Management have an ethical and fiduciary responsibility to protect, preserve and recover enterprise resources if a disruptive event occurs. In the event of a disruption in the business operations of ARA Group, the BCMS aims to protect, recover, and preserve:

- (a) human life and well-being;
- (b) enterprise resources, such as facilities, equipment, goods/products, raw materials, technology systems and information assets (electronic and non-electronic), intellectual capital, and intellectual property;
- (c) continuity of business operations in acceptable time frames, including the delivery of products and services, as well as stakeholder access to their information;
- (d) decision-making processes;
- (e) public confidence;
- (f) brand and reputation;
- (g) revenue streams, funding sources and investments;
- (h) legal, contractual, and regulatory obligations;
- (i) corporate responsibility compliance; and
- (j) directors' compliance to ethical and fiduciary obligations.

### 5.3. **Business Continuity Management**

- (a) ARA Group's BCMS must be managed in accordance with the processes and procedures as set out in the Business Continuity Management System Manual as contained in **Appendix B** and Business Continuity Management Procedure as contained in **Appendix C**.
- (b) ARA Group corporate services, business units, critical business processes, and information processing facilities must have a risk-based business continuity plan (**BCP**) which defines accountability, roles and responsibilities, response, recovery, as well as continuity strategies to protect ARA Group companies from the loss of workforce, facilities, technology, and supply chain operations.
- (c) Each of ARA Group's BCM programs must be implemented in a cost-effective manner, based on a risk and BIA, and in compliance with applicable industry, legal and regulatory requirements.

- (d) At a minimum ARA Group's BCMS must address the following components:
- Crisis management.
  - Emergency response.
  - ITDR management.
  - Business unit and process recovery.
  - Contingency planning/supply chain availability.
  - Pandemic planning.
- (e) ARA Group corporate services and business units must exercise, test and improve plans based on a formal training program.

#### 5.4. **Roles and Responsibilities**

- (a) The Steering Committee's role is to define and maintain metrics in support of the BCMS and this BCM Policy, designed to assist in improving the preventive maintenance of ARA Group's business continuity objectives.
- (b) All staff must understand and adhere to this BCM Policy, and report suspected or actual breaches of policy.
- (c) Specific roles and responsibilities for the operation the BCMS are documented in **Appendix A**.

#### 5.5. **Legal and Regulatory Obligations**

ARA Group complies with all relevant legal and regulatory obligations related to business continuity in both Australia and New Zealand. ARA Group and its business entities maintain a process to identify and document applicable legal and regulatory requirements related to the continuity of its services and resources. These applicable legal, regulatory and other requirements will be considered in implementing and maintaining the BCMS.

#### 5.6. **Training and Awareness**

- (a) This BCM Policy must be made readily and easily available to all Employees and Third-Party Personnel.
- (b) Senior Management including their business management team in each location will receive regular awareness and training to understand their responsibilities under this BCM Policy.

### 6. **COMPLIANCE MANAGEMENT**

- (a) Compliance to this BCM Policy must be verified through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the Executive Management.
- (b) Any exception to this BCM Policy must be reported to the BCM Steering Committee for review and approval.
- (c) This BCM Policy must be formally reviewed and approved at least annually or when significant changes to the business occur as set out in the Business Continuity Management System Manual.

### 7. **RELATED DOCUMENTS**

- (a) Business Continuity Management System Manual.
- (b) Business Continuity Management Procedure.
- (c) Business Continuity Management Committee Terms of Reference.
- (d) BU Business Continuity Plans.
- (e) IT Disaster Recovery Plan.
- (f) Cyber Incident Response Plan.

- (g) Crisis Management Plan.
- (h) Crisis Communications Plan.

**8. NEW ZEALAND LEGISLATION**

The provisions contained in this BCM Policy apply equally to ARA Group Employees and Third-Party Personnel based in New Zealand and are intended to be interpreted and applied with due regard to the corresponding laws and regulation in New Zealand.

**9. QUERIES**

If you have any queries regarding the information in this BCM Policy, please contact ARA Group's Corporate Administrator by emailing [requests@aragroup.com.au](mailto:requests@aragroup.com.au).

**10. REVIEW**

This BCM Policy will be reviewed periodically to ensure its effectiveness and relevance to ARA Group's goals and objectives. Any amendments may be made as necessary to reflect changes in the legislation and business requirements.



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Edward Federman

Chief Executive Officer

21 January 2026

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Date

## APPENDIX C: ROLES AND RESPONSIBILITIES

Role	Requirement and Responsibilities
<b>Board of Directors &amp; CEO</b>	<ul style="list-style-type: none"> <li>• Define business continuity risk appetite.</li> <li>• Provide commitment to the continual improvement the BCMS and achieving business continuity objectives.</li> </ul>
<b>Executive Management</b>	<ul style="list-style-type: none"> <li>• Approve this BCM Policy on behalf of the Board of Directors.</li> <li>• Approve and provide resources to deliver on business continuity objectives.</li> <li>• Determine business strategy to set requirement for business continuity strategy.</li> <li>• Review emerging business continuity risks and escalate key risk issues to the Board of Directors.</li> <li>• Review business continuity risks and risk treatments above risk appetite.</li> <li>• Determine business context for the BCMS.</li> <li>• Conduct management review of the BCMS.</li> </ul>
<b>BCM Steering Committee</b>	<ul style="list-style-type: none"> <li>• Include representatives from all ARA Group corporate services, Legal, Finance, Technology, and Creative, providing shared services to functional business divisions, including Fire &amp; Security, Products, Electrical, and Property Services.</li> <li>• Determine the formation and reporting relationships of the BCMS.</li> <li>• Determine the resources required to achieve business continuity objectives.</li> <li>• Provide governance and support over the implementation plan and continual improvement of the BCMS.</li> <li>• Oversee business unit and regional disruption planning and departmental recovery capability to effectively manage disruption-related risk.</li> <li>• Monitor security metrics against determined KPIs to measure performance of the BCMS.</li> <li>• Review and endorse business continuity objectives, policies, strategies, BIAs and BCPs.</li> </ul>
<b>Crisis Management Team (CMT)</b>	<ul style="list-style-type: none"> <li>• Coordinate the crisis event, including assessing the impact to business operations.</li> <li>• Determining the operational and strategic response.</li> <li>• Review and endorse external communications.</li> </ul>
<b>CMT Lead – role provided by the CEO</b>	<ul style="list-style-type: none"> <li>• Declare activation and deactivation the Crisis Management Plan (CMP).</li> </ul>

Role	Requirement and Responsibilities
	<ul style="list-style-type: none"> <li>• Lead coordination of the CMP with the CMT and the Board of Directors as part of responding to a crisis event, including making key operational and strategic decisions in consultation with subject matter experts.</li> <li>• Approval of external communications.</li> </ul>
<b>BCM Owners / BCP Leads – role provided BU Managing Directors</b>	<ul style="list-style-type: none"> <li>• Ensure their business unit implements and applies the requirements of this BCM Policy, building resilience into day-to-day business operations.</li> <li>• Provide extensive support and expertise to other business units in the event of continuity objectives not being met or maintained across ARA Group.</li> <li>• Support and gather business continuity metrics to assist in the effective management of continuity objectives.</li> <li>• Ensure disruption-related risks, controls and actions are identified, recorded, and reviewed.</li> <li>• Appoint BCM Coordinators and Deputy BCP Leads to be part of a BCM implementation and operations team.</li> <li>• Ensure BIAs capture all critical business functions.</li> <li>• Ensure BCPs are fit-for-purpose and testing/exercising is completed.</li> <li>• Approve the business units BIAs and BCP.</li> <li>• Active BCPs.</li> </ul>
<b>Deputy BCP Leads – Role provided by BU General Managers</b>	<ul style="list-style-type: none"> <li>• Represent BCM Owners in the development and exercising of all components within ARA Group’s BCMS.</li> <li>• Active and deactivate BCPs on behalf the BCM Owner if required.</li> <li>• Support the BCP Lead with managing the continuity of business operations.</li> </ul>
<b>BCM / BCP Coordinators – role provided by BU Officer Managers</b>	<ul style="list-style-type: none"> <li>• Coordinate and arrange approval for the BIA for their area of responsibility.</li> <li>• Supporting establishment, testing, maintenance and improving their BCPs.</li> <li>• Ensure coordination BCP kits are up-to-date and accessible.</li> <li>• Support the BCP Lead with co-ordination of BCP operations and actions.</li> </ul>
<b>Public Relations &amp; Communications – function outsourced to specialist third party provider</b>	<ul style="list-style-type: none"> <li>• Management of media and public relations where a BCP may require public or external communications.</li> <li>• Coordinate with the media, working according to guidelines that have been previously approved and issued for dealing with post-disaster communications.</li> </ul>

Role	Requirement and Responsibilities
<b>Technology</b>	<ul style="list-style-type: none"> <li>• Provide expertise to determine RTO and RPOs for technology assets.</li> <li>• Ensure that ITDR capabilities are appropriately designed and implemented according to defined business recovery requirements and ITDR plans.</li> <li>• Maintain the availability and recovery capabilities of infrastructure, networks, and cloud environments etc in accordance with ITDR plans.</li> <li>• Support business unit representatives SMEs familiar with the continuity requirements of any affected functions.</li> <li>• Ensure that information security risks and associated vulnerabilities which may be exploited and lead to a business disruption are addressed and communicated to business units and Executive Management.</li> <li>• Integrate information security practices into business continuity and disaster recovery planning.</li> </ul>
<b>People &amp; Safety – function provided by BU</b>  <b>General managers</b>	<ul style="list-style-type: none"> <li>• Coordinate workforce recovery activities and personnel management activities.</li> <li>• Develop and coordinating health, safety, medical strategies, and activities resulting from a business disruption.</li> <li>• Coordinate with external entities, such as first responders, medical services and other government agencies or organisations required to allow the ongoing continuity of ARA Group operations.</li> </ul>
<b>Legal – role provided by General Counsel</b>	<ul style="list-style-type: none"> <li>• Develop and coordinate legal and regulatory issues related to maintaining the continuity of ARA Group’s business operations</li> <li>• Manage the legal consequences of a business disruption.</li> </ul>
<b>Facilities Management – function provided by BU</b>  <b>General managers</b>	<ul style="list-style-type: none"> <li>• Develop and coordinate facility and physical security management strategies, emergency response plans, and activities resulting from a business disruption.</li> <li>• Work closely with people &amp; safety roles in the event of a BCP being invoked.</li> </ul>
<b>Staff with BCM responsibilities</b>	<ul style="list-style-type: none"> <li>• Maintain capability for specified role(s) in BCP(s).</li> <li>• Understand and fulfil specific roles and responsibilities outlined in the BCPs.</li> <li>• Take reasonable care for staff wellbeing, including managing fatigue during response and recovery.</li> </ul>
<b>All staff</b>	<ul style="list-style-type: none"> <li>• Comply with business continuity policies, plans, and procedures.</li> <li>• Report suspected or actual disruptive events immediately.</li> <li>• Undertake business continuity training as it relates to their roles.</li> </ul>



**APPENDIX B: BUSINESS CONTINUITY MANAGEMENT SYSTEM MANUAL**

# **ARA Group**

## **Business Continuity Management System (BCMS) Manual**

**Revision history:**

Version Number	Changes made	Person responsible	Date updated
Version 0.1	Initial Draft	Clyde & Co	
Version 0.1	Reviewed for ARA Group purposes	Danielle Dieckmann	December 2024
Version 0.1	Reviewed for ARA Group purposes	Azita Doudman	December 2025
Version Final	Reviewed for Approval	Allison McCann	January 2026

**Communication strategy:**

Manager/staff	Type of communication	Person responsible	Frequency

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## Approval and Sign Off

Authorisation – ARA Group	
Name:	Name:
Title:	Title:
Signature:	Signature:
Date:	Date:

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## 1. Introduction

ARA Group has established this Business Continuity Management System (BCMS) Manual ('Manual') to ensure the long-term viability of ARA is maintained in the event of an interruption to critical or essential business processes.

## 2. Purpose

This purpose of this Manual is to provide the framework to how ARA Group will establish, implement, maintain, and continually improve its BCMS aligned to ISO22301:2019. ISO 22301:2019 provides guidance on all aspects of this BCMS. ARA Group's document control procedures apply to this Manual and to all other documents within the BCMS.

## 3. Definitions

- a) **Business Continuity Management (BCM):** The practice of planning, building, running and governing activities to ensure ARA Group:
  - identifies and mitigates operational risk leading to business disruptions before they occur;
  - prepares for and responds to disruptive events; and
  - restores ability to deliver key processes to an agreed level within an agreed time following a disruption.
- b) **Disruptive Events:** Events such as loss of office access, infrastructure, system access, human resources, external dependencies etc. caused by disaster scenarios such natural disasters, fires, terrorist attacks, political unrest, power disruption, sabotage, hardware failure, cyber-attacks, telecommunications failures, pandemics, loss of key staff members, loss of critical suppliers etc.
- c) **Business Impact Analysis (BIA):** Process of determining the criticality of business processes and associated information assets for continuity of business operations during and after a business disruption.
- d) **IT Disaster Recovery (ITDR):** Formal processes to respond and recover from a disruption event that negatively impacts information assets and information processing facilities.
- e) **Emergency Response Planning:** Formal processes to respond to disaster scenarios affecting access or safety with ARA Group company offices.
- f) **Information Asset:** Any digital or hard copy information, or information system that stores and/or processes information.
- g) **Information Processing Facilities:** Any infrastructure involved in processing information, including IT hardware equipment and physical locations.

## 4. Organisational Context

This section of the Manual defines the organisational context and the scope of the BCMS, including ARA Group corporate services, business divisions, business units, physical premises, information processing facilities, information assets, as well as the components that are external to the boundaries of the BCMS.

### 4.1 About ARA Group

ARA Group provides essential services across Australia and New Zealand and is comprised of four complimentary operating divisions: Electrical, Fire and Security, Products, and Property Services.

## 4.2 Internal and External Factors

To effectively manage information security risks, it is important to understand the context of ARA Group's business environment. **Table 1 and 2** outline the internal and external factors that need to be understood and how they could affect the operation of the BCMS.

**Table 1:** Internal factors.

Factor	Description
<b>Governance</b>	Decision making and power to define expectations and manage performance.
<b>Financial</b>	Available funding for internal resources.
<b>Organisational structure</b>	Establishment of internal hierarchy and lines of authority.
<b>Roles and accountabilities</b>	Assignment of roles and responsibilities for the establishment, operation, maintenance, and continual improvement of the BCMS.
<b>Policies, objectives, and strategy</b>	Processes, requirements, and activities developed to achieve business objectives.
<b>Capabilities</b>	Company resources and knowledge (e.g., services).
<b>Internal stakeholders</b>	Management of perceptions, values, and relationships with interested/invested parties.
<b>Organisational culture</b>	Company values, mission statement, and employee perceptions.
<b>Information management</b>	Technology systems, information flows and decision-making processes (both formal and informal).

**Table 2:** External factors.

Factor	Description
<b>Social</b>	Communities and customs of the jurisdictions where ARA Group operate.
<b>Cultural</b>	Shared beliefs and values of the jurisdictions where ARA Group operate.
<b>Political</b>	Governmental policy of the jurisdictions where ARA Group operate.
<b>Legal and regulatory</b>	Laws and regulations of the jurisdictions where ARA Group operate.
<b>Economic</b>	Economic environment and stability in the jurisdictions where ARA Group operate.
<b>Natural</b>	Natural disasters that could occur in the environments where ARA Group operate.
<b>Technological</b>	Changes in the technology assets utilised by ARA Group.
<b>Competitive</b>	Performance of other companies that perform similar services to ARA Group companies.
<b>External stakeholders</b>	Perceptions, values, and relationships with ARA Group company key external interested parties.
<b>Contractual</b>	Contractual requirements established with third parties to perform ARA Group company services to clients and internal processes.

## 4.3 Interested Parties

Interested parties are those who have an active interest in ARA Group's information security practices and the operation and performance of its ISMS. **Table 3** outlines the key interested parties and their respective needs and expectations.

**Table 3:** Interested parties.

Factor	Description
<b>Customers</b>	Continuity of services provided to them, availability of their information, and compliance with contractual agreements.
<b>Regulators</b>	Compliance with jurisdiction specific laws and regulations.
<b>Business Divisions / Units</b>	Published BCM requirements to adhere to for protection of ARA Group reputation, meeting client expectations, and continuous generation of revenue.
<b>Employees</b>	BCM awareness and training to help align responsibilities with ARA Group's business continuity objectives and policy.
<b>Auditors</b>	Compliance with certification framework requirements.
<b>Management &amp; Board</b>	Continuity of business operations and compliance with contractual agreements and external regulations.

## 4.4 Legal and Regulatory Requirements

ARA Group and its business entities will maintain a process to identify and document applicable legal and regulatory requirements related to the continuity of its services and resources. These applicable legal, regulatory and other requirements will be considered in implementing and maintaining the BCMS.

## 4.5 BCMS Scope

The BCMS scope includes:

- a) **ARA Group Corporate Services and Divisions:** ARA Group corporate services and divisions within the scope of the BCMS in **Table 4**.

**Table 4:** ARA Group divisions.

Division	Description
<b>ARA Group Services</b>	Provide shared corporate services, such as Finance, Legal, Technology and Creative, to the business divisions.
<b>ARA Electrical</b>	Provides industrial low voltage and high voltage installation and service.
<b>ARA Products</b>	Manufactures a range of high security products, commercial doors, shelters and bollards; distributes electronic security products, door hardware, fire sprinkler products.
<b>ARA Fire and Security</b>	Provides installation and service of electronic security systems and fire protection systems.
<b>ARA Property Services</b>	Provides building maintenance and repair services, cleaning services and installation and service of air conditioning and building automation systems.

- b) **Physical locations:** ARA Group offices, sites, information processing facilities and IT equipment owned or leased by ARA Group at the locations in **Appendices 1**.

- c) **Assets:** ARA Group assets in any format, whether physical or digital, owned or contracted by ARA Group to process and/or store company information in **Table 6** and inventoried in the asset register.

**Table 6:** Assets.

Category	Examples
<b>Customer information</b>	Personal information, financial information etc.
<b>Staff information</b>	Personal information, employment records, financial information etc.
<b>Administrative information</b>	Financial records, legal documents, intellectual property etc.
<b>Technology systems</b>	IT infrastructure, database, applications, networks, cloud environments
<b>Infrastructure Assets</b>	Machinery, power tools etc.

The BCMS scope excludes:

- a) Under shared responsibilities matrix third party cloud providers will be responsible to deliver their obligations as per service agreements and the BCMS program.
- b) Datacentre providers will be responsible for business continuity controls at data centre facilities hosting ARA Group technology systems as per service agreements and the BCMS program.
- c) For new ARA Group acquisitions, in scope requirements will be included at different stages following integration of business processes, assets, and physical locations etc.

## 5. Leadership

Effective BCM requires visible and sustained commitment from top management. This section of the Manual outlines the leadership and commitment required by ARA Group to establish, implement, maintain, and continually improve its BCMS.

### 5.1 Leadership and Commitment

ARA Group Executive Management will provide evidence on behalf of the Board of Directors ('the Board') to demonstrate its commitment to the BCMS by:

- a) establishing, documenting and communicating a BCM policy;
- b) ensuring that business continuity objectives are established and align with business strategy;
- c) establishing roles and responsibilities for business continuity;
- d) communicating to ARA Group the importance of meeting business continuity objectives and conforming to the BCM policy, its responsibilities under the law and the need for continual improvement;
- e) providing sufficient resources to establish, implement, maintain, and continually improve its BCMS;
- f) defining the criteria for accepting business continuity risks, ownership and accountability at the appropriate risk level;
- g) ensuring that internal audits are conducted to measure the effectiveness of the BCMS for continual improvement; and
- h) conducting management reviews of the BCMS.

### 5.2 Policy

ARA Group has documented a **Business Continuity Management Policy** that includes business continuity objectives, leadership commitment to continual improvement of the BCMS and roles and responsibilities for business continuity. The policy will be communicated to the interested parties in **Section 4.3** in accordance with **Section 7.4** of this Manual. BCM policy will be formally reviewed and approved in accordance with **Section 7.5** of this Manual.

## 5.3 Organisational Roles, Responsibilities, and Authority

Defining authority and communicating roles and responsibilities is critical to ensuring that everyone within ARA Group understands their roles and responsibilities with respect to information security. Roles and responsibilities for information security management within ARA Group have been defined as follows:

- a) The Board has ultimate authority over the Tier 1 **Business Continuity Management Policy** and BCMS, but this is delegated to the Executive Management team which approves all changes to the policy and this Manual.
- b) The Chief Financial Officer (CFO) has lead responsibility for business continuity and works with the BCM Steering Committee to document, approve, and publish all Tier 2 and Tier 3 documents as part of the BCMS.
- c) BCM Owners of corporate services and business units are responsible for identifying business risks associated with business processes and for the continuity of business operations in accordance with BCM policy.
- d) The responsibility for carrying out these processes or associated task(s) can be delegated to anyone within the BCM Owner's area of responsibility provided that:
  - the individual has the necessary skill, competence, and resources to carry out the processes or task(s); and
  - the BCM Owner retains accountability for ensuring that the process or task is carried out correctly.
- e) BCM Owners are likely to be heads of corporate services or managing directors of business units who will not be involved in day-to-day processes. Individuals are required to be made responsible for local co-ordination and support and heads of corporate services or managing directors will establish an appropriate network of such individuals.

## 6. Planning

Effective BCM requires achievable objectives and a well-documented framework for managing business continuity risks effectively. This section of the Manual outlines the framework for establishing business continuity objectives and planning on how to achieve them using a risk-based approach.

### 6.1 Actions to Address Risks and Opportunities

ARA Group's approach to risk and the risk management framework is endorsed by the **Business Risk Management Policy** which applies to overall strategic planning, including business continuity risk. The risk management framework is designed to identify and assess business continuity risks, to identify and evaluate options for the treatment of those risks, and to select controls that will reduce those risks to acceptable levels within business risk appetite, operational requirements, constraints, objectives, legislation, and regulation.

ARA Group will consider the internal and external factors in **Section 4.2** to determine the risks and opportunities that need to be addressed to:

- a) ensure the BCMS can achieve its intended outcome(s);
- b) prevent or reduce undesired effects; and
- c) achieve continual improvement.

ARA Group will plan actions to address these risks and opportunities and integrate and implement these actions into its BCMS processes, and then evaluates the effectiveness of these actions.

### 6.2 Business Continuity Objectives

ARA Group will establish, and document business continuity objectives aligned with business and IT strategy. Business continuity objectives will:

- a) take into account results from risk assessment;
- b) be communicated via BCM policy;
- c) be measurable;
- d) be monitored; and
- e) be updated as appropriate following management review.



ARA Group will maintain an BCMS implementation plan and supporting project related documentation for how to achieve the business continuity objectives, including but not limited to:

- a) the actions required for each plan or project;
- b) what resources will be required;
- c) who will own and be responsible for the action plans;
- d) timeframes from when action plans will be implemented and reviewed; and
- e) how action plans will be validated as implemented and performance evaluated.

## 6.3 Planning Changes

The BCM Steering Committee will be responsible for reviewing and endorsing action plans related to the BCMS implementation plan. The committee will control changes to the BCMS implementation plan and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary. Any change will be carried out following formal change control procedures and records maintained.

## 7. Support

Effective BCM requires adequate support both internally and externally using specialist service providers. This section of the Manual outlines the resources, competencies, awareness, communications, and documentation required by ARA Group to establish, implement, maintain, and continually improve its BCMS.

### 7.1 Resources

ARA Group will determine and provide the resources needed to:

- a) establish, implement, maintain and continually improve the BCMS;
- b) ensure that business continuity procedures support business requirements;
- c) identify and address legal and regulatory requirements and contractual business continuity obligations;
- d) maintain adequate BCM processes;
- e) carry out reviews when necessary, and to react appropriately to the results of these reviews; and
- f) improve the effectiveness of the BCMS.

### 7.2 Competence

ARA Group will ensure that all personnel who are assigned responsibilities for the BCMS are competent to perform the required tasks by:

- a) determining the necessary competencies for BCMS related roles;
- b) providing training or employing competent personnel to satisfy these needs; and
- c) maintaining records of education, training, skills, experience, and qualifications.

ARA Group Technology function will contain at least one member with a business continuity qualification or certification. Internal audits will be outsourced to a suitability qualified external service provider.

### 7.3 Awareness

ARA Group will ensure that all relevant personnel are aware of the relevance and importance of their business continuity responsibilities and how they contribute to the achievement of the BCMS objectives. BCMS awareness will be included as part of the awareness and training program.

## 7.4 Communication

ARA Group will provide regular updates to interested parties on the implementation, maintenance, and continual improvement of the BCMS in accordance with **Table 8**.

**Table 8:** Communications plan.

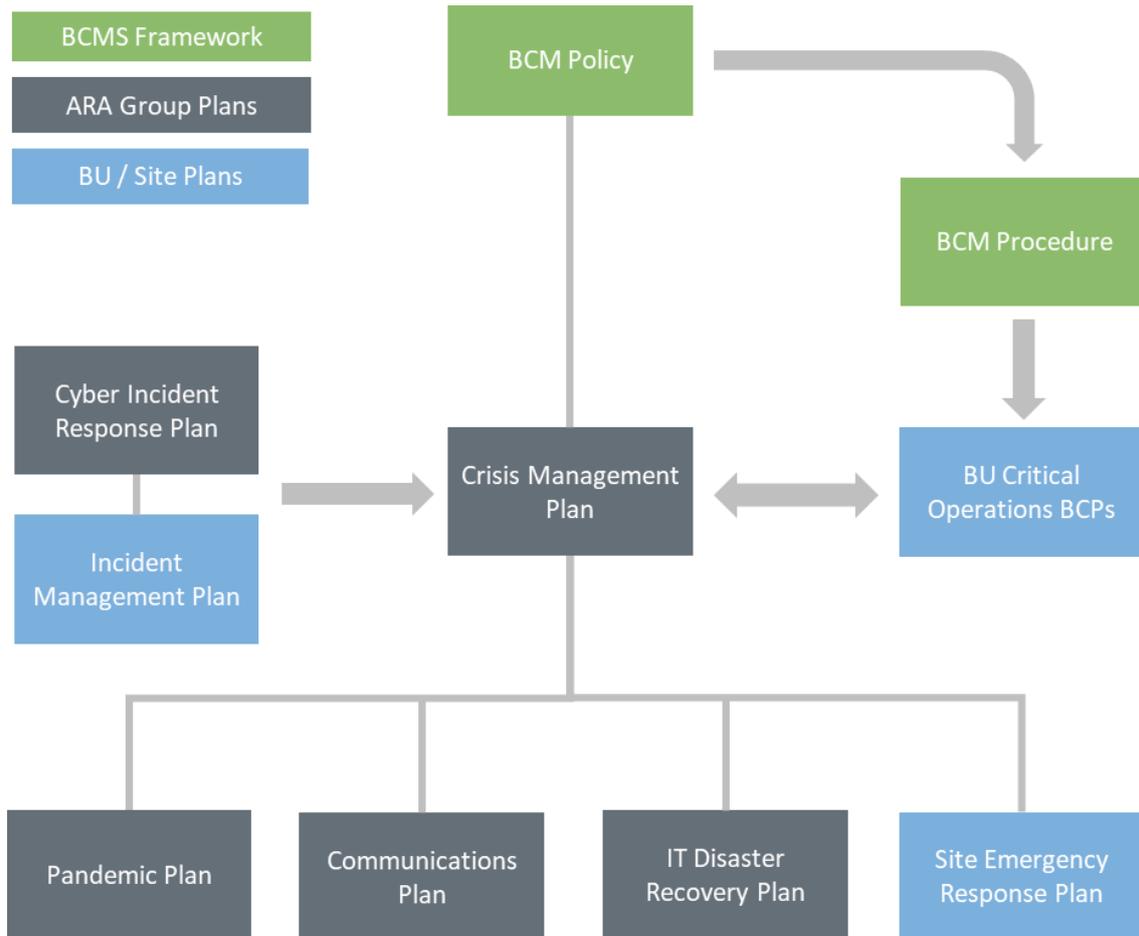
Who?	What?	When?	How?
<b>Customers</b>	BCMS Framework	On request	Email
<b>Regulators</b>	BCMS Framework	On request	Email
<b>Divisions</b>	Summary of BCMS implementation plan progress and key processes affecting them	Biannually	Email, Intranet(s)
<b>Employees</b>	Summary of BCMS implementation plan progress and key processes affecting them	Biannually	Email, Intranet(s)
<b>Auditors</b>	BCMS documentation, evidence of process implementation	On request	Email
<b>Management &amp; Board</b>	Summary of BCMS implementation plan progress and performance metrics	Biannually	Email

## 7.5 Documented Information

Documentation is essential to the effective management of business continuity risks. This section includes the framework for creating, maintaining, and updating documentation, as well as guidelines for document control and distribution. BCMS documentation is categorised in four tiers:

- a) **Tier 1** – ARA Group’s top-level BCM policy will be endorsed the BCM Steering Committee and approved by the Executive Management team. This document demonstrates leadership commitment to the BCMS, its business continuity objectives, and the delegation on authority for approval of sub-documents within the BCMS Framework.
- b) **Tier 2** – BCM procedures that detail how BCM processes are to be managed, including step-by-step guidance to implement business continuity policy requirements, endorsed by the BCM Steering Committee and approved by the CFO.
- c) **Tier 3** – Series of plans and processes that support compliance with BCM policy and procedures and enable effective business continuity and recovery of business operations. These documents are approved by the relevant BCM Owners that are primary responsible for their implementation.
- d) **Tier 4** – Records and artefacts to support implementation of BCM processes, including BIAs and details of audits, management reviews, registers, logs, meeting minutes etc. that are used to monitor and continually improve the effectiveness of the BCMS. Tier 4 documents serve as evidence of conformity to BCM requirements and the effective operation of the BCMS and are retained in accordance with the ARA Group’s information retention policies/schedules.

The diagram below presents the core documentation within ARA Group's BCMS:



ARA Group's BCMS documentation is controlled and will be approved at the tiers described above. Documents are available to those who need and are authorised to access them in line with policy requirements.

BCMS documents will be controlled as follows:

- a) will be assigned a reference;
- b) will contain details of the intended audience;
- c) will include an approver and approval date;
- d) the approver will ensure the adequacy of documents is confirmed before being published;
- e) will include a next review date which will be a maximum of one year apart;
- f) will contain metadata which will ensure that changes and the current revision status of documents is identified;
- g) will include a classification; and
- h) the Corporate Administrator will ensure that all relevant versions of applicable documents are available via ARA Group's intranet in PDF format;

The BCM Framework will be formally reviewed and approved at least annually, or when significant changes occur. Primary roles will be required to review each document in the BCMS Framework and provide feedback where necessary as per **Table 9**.

**Table 9: BCMS Framework review primary roles matrix.**

Policy Title	EM	CFO	Legal	CTO	BCM Owners	BCM Coord.
BCMS Manual	X	X	X	X	X	
BCM Policy	X	X	X		X	
BCM Procedure		X		X	X	X
Incident Management Plans					X	X
Crisis Management Plan	X	X				
Pandemic Plan	X	X			X	
Crisis Comms Plan	X	X			X	
BCPs		X	X	X	X	X
ITDR Plans				X		
Site ERPs		X		X	X	X

Records will be established and maintained to provide evidence of conformity to policy requirements and the effective operation of the BCMS. Records will be protected and controlled. The BCMS will take account of any relevant legal or regulatory requirements and contractual obligations. Records will remain legible, readily identifiable, and retrievable. The controls needed for the identification, storage, protection, retrieval, retention time, and disposition of records will be documented and implemented.

## 8. Operation

Effective BCM requires careful planning and control with risk treatment plans identified following risk assessment. This section of the Manual outlines the Plan, Do, Check, Act (PDCA) process adopted by ARA Group to establish, implement, maintain, and continually improve its BCMS.

### 8.1 Operational Planning and Control

**ARA Group will conduct the following Plan (Plan for the BCMS) actions:**

- a) Define and approve the scope of the BCMS (**Section 4.5**).
- b) Define and approve BCM policy (**Section 5.2**).
- c) Establish risk management strategy (**Section 6.1**).
- d) Establish and approve a suitable risk management framework that is appropriate for its business, legal and regulatory requirements (**Section 6.1**).
- e) Define a framework for setting business continuity objectives (**Section 6.2**).
- f) Establish requirement for legal, regulatory and contractual compliance (**Section 4.4**).
- g) Establish and approve this Manual for operation of the BCMS (**Section 7.5**).
- h) Executive Management authorises the implementation of the BCMS and any changes to BCM policy and this Manual (**Section 7.5**).

**ARA Group will conduct the following Do (Implement and Operate the BCMS) actions:**

- a) Define risk treatment plans to reflect the decisions made in the 'Plan' phase, and identify management action, responsibilities and priorities for managing the identified business continuity risks.
- b) Allocate appropriate funding and resources as described in the risk treatment plan.
- c) Implement selected controls to meet the identified control objectives.
- d) Implement formal operational procedures required by this Manual.
- e) Commit resources to the effective management of the BCMS as well as investing in business continuity products and services as required by risk treatment plans.
- f) Implement monitoring procedures and controls as required by the control objectives.

**ARA Group will conduct the following Check (Monitor and Review the BCMS) actions:**

- a) Monitor controls to identify security incidents.
- b) Audit controls to inform management review and to assess whether security activities are performed in line with control objectives.
- c) Whenever there are significant changes in ARA Group's internal or external factors that could affect the BCMS, review risk assessment and risk treatment plans that are affected by the changes.
- d) Record actions or events that could impact the effectiveness of the BCMS.

**ARA Group will conduct the following Act (Maintain and Improve the BCMS) actions:**

- a) Where improvement opportunities for the BCMS are identified during the 'Check' phase, implement corrective actions if they meet the criteria of risk treatment plans.
- b) Document procedures for corrective and preventative action throughout the BCMS.
- c) Communicated results of reviews to everyone involved and actions delegated to the appropriate people.
- d) Monitoring and audit of corrective action plans to ensure that intended objectives have been achieved.

## 8.2 Business Impact Analysis and Risk Assessment

Critical business processes and associated resources, and their impact on the business operations if not available, will be identified through the BIA process using the BCM Tool. This process will be conducted at least annually by all ARA Group corporate services and business units and for all major process changes, new projects, and products. BCM Owners for each function will be responsible for ensuring BIAs are completed appropriately in accordance with BCM policy and **Business Continuity Management Procedure**.

A BCM risk assessment will be conducted and maintained in a Risk Register within the context of the context of the risk management framework described in **Section 6.1**. Availability threats and vulnerabilities will be identified for all ARA Group company critical business processes and associated resources through the BCM risk assessment process. The risk assessment process will be conducted at least annually by all functions, and for all major process changes, new projects, and products in accordance with BCM policy. Additional controls and processes will be selected as required to reduce risk. Business continuity risks will be incorporated into the risk register for review and management by Executive Management.

Documented information will be made available to the extent necessary to have confidence that the

processes have been carried out as planned, including documented information on the results of business continuity risk assessments. Risk treatment plans will be reviewed and updated as necessary in accordance with the risk management framework.

## 8.3 Business Continuity Management Strategies

Based on the outputs from the BIA and risk assessment in **Section 8.2**, ARA Group will identify, select and prioritise one or more business continuity strategies that consider options for before, during and after disruption and document these in the BCPs.

Business continuity strategies and solutions will be identified to:

- a) meet the requirements to continue and recover prioritised activities within the identified timeframes and agreed capacity;
- b) protect the organisations prioritised activities;
- c) reduce the likelihood of disruption;
- d) shorten the period of disruption;
- e) limit the impact of the disruption on ARA Group services; and
- f) provide for the availability of the required resources.

Business continuity strategies and solutions will be selected, resource requirements determined, and solutions implemented following a risk-based approach with consideration to costs and benefits in accordance with the risk management framework.

## 8.4 Business Continuity Plans and Procedures

BCM plans including, but not limited to, business continuity, business recovery, crisis management, emergency response, and ITDR will be developed, maintained, and exercised for all ARA Group corporate services and business units with efforts concomitant to availability risks identified for each function in accordance with BCM policy and the **Business Continuity Management Procedure**. Plans and procedures will be based on the output of the selected strategies and solutions in **Section 8.3**.

Plans and procedures will:

- a) be specific regarding the immediate steps that are to be taken during a disruption;
- b) be flexible to respond to the changing internal and external conditions of a disruption;
- c) focus on the impact of incidents that potentially lead to disruption;
- d) be effective in minimising the impact through the implementation of appropriate solutions; and
- e) assign roles and responsibilities for tasks within the team.

## 8.5 Exercise Program

A BCM training program will be put place to communicate BCM policy, plans, procedures, and concepts of the BCMS. Training components will be identified, and relevant training requirements captured and documented in the **Business Continuity Management Procedure**, including a schedule for each training component.

The training program will include exercises and test that:

- a) are consistent with its business continuity objectives;
- b) are based on appropriate scenarios that are well planned with clearly defined aims and objectives;
- c) develop teamwork, competence, confidence and knowledge for those who have roles to perform in relation to disruptions;
- d) taken together over time, validate its business continuity strategies and solutions;
- e) produce formalised post-exercise reports that contain outcomes, recommendations and actions to implement improvements;
- f) are reviewed within the context of promoting continual improvement; and
- g) are performed at planned intervals and when there are significant changes within the organisation or the context in which it operates.

ARA Group will act on the results of its exercising and testing to implement changes and improvements.

## 9. Performance Evaluation

Effective BCM requires metrics to be monitored against Key Performance Indicators (KPI) to evaluate the performance of the BCMS. This section of the Manual outlines the metrics, KPIs, audits and management review required by ARA Group to continually improve its BCMS.

### 9.1 Monitoring, Measurement and Evaluation

ARA Group will maintain a register of KPIs and security metrics to monitor, measure and evaluate the performance of the BCMS and ability to achieve its information security objectives. Performance metrics and KPIs will be reported to the BCM Steering Committee bi-annually for evaluation. A select group of metrics and KPIs will be reported to Executive Management bi-annually.

### 9.2 Internal Audit

ARA Group will conduct independent internal audits of the BCMS at planned intervals in line with an audit program and following formal procedures. Audits will determine compliance of the BCMS against the ISO22301:2019 standard and ensure it is effectively implemented, maintained, and performs as expected. Where there is a gap in internal capability to conduct internal audits, this activity will be outsourced to a suitability qualified external service provider.

Management responsible for the area being audited will ensure that actions are taken without undue delay to eliminate detected non-conformities and their causes. Follow-up activities will include the verification of the actions taken and the reporting of verification results in accordance with **Section 10** of this Manual.

### 9.3 Management Review

Executive Management will conduct a management review the BCMS at planned intervals of at least once every **6 months** to ensure its continuing suitability, adequacy, and effectiveness. This review will include assessing opportunities for improvement and the need for changes to the BCMS, including information security policy and objectives. The results of the reviews will be documented, and records maintained.

## 10. Improvement

Effective BCM requires continual improvement. This section of the Manual outlines the processes for improvement, non-conformity, and corrective action by ARA Group.

### 10.1 Continual Improvement

ARA Group will use the output from audits, controls testing, security metrics and KPIs to continually improve the suitability, adequacy and effectiveness of the BCMS. Performance metrics will be requested and evaluated as part of the BCM Steering Committee and additional funding, and resources will be sought where required from Executive Management where control performance is not meeting KPIs. KPIs will be reviewed and adjusted at least every **12 months**, and additional security metrics and KPIs established where required to ensure that the BCMS is continually improved.

### 10.2 Non-Conformity and Corrective Actions

Where non-conformity is identified through the audit and controls testing program, or through other processes, ARA Group will evaluate the requirement for corrective actions to eliminate the causes of the non-conformity following formal procedures. Correctives actions will be fully documented, and the effectiveness will be reviewed following implementation. A process will also be conducted to identify if similar non-conformities exist or could potentially occur in other environments in scope of the ISMS.

## 11. Compliance Management

- (d) Compliance to this Manual will be verified through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the Manual owner.
- (e) This Manual will be formally reviewed and approved at least annually or when significant changes to the business occur as set out in **Section 7.5** of this Manual.

## 12. Related Documents

- a) Business Continuity Management Policy
- b) Business Continuity Management Procedure.
- c) Business Risk Management Policy.



**APPENDIX B: BUSINESS CONTINUITY MANAGEMENT PROCEDURE**

# **ARA Group**

## **Business Continuity Management Procedure**



**Revision history:**

Version Number	Changes made	Person responsible	Date updated
Version 0.1	Initial Draft	Clyde & Co	
Version 0.1	Reviewed for ARA Group purposes	Danielle Dieckmann	December 2024
Version 0.1	Reviewed for ARA Group purposes	Azita Doudman	December 2025
Version Final	Reviewed for Approval	Allison McCann	January 2026

**Communication strategy:**

Manager/staff	Type of communication	Person responsible	Frequency

**Document contacts:**

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## 1. Purpose

This Business Continuity Management Procedure ('Procedure') details the responsibilities and processes for business continuity management to reduce the likelihood and minimise the impact of disruptive events.

This Procedure describes how ARA Group manages business continuity, such as conducting business impact assessments (BIAs) to identify critical business functions required to achieve critical objectives during disruptions and developing business continuity plans (BCPs) to prepare for disruptive events. The Procedure also explains how BCPs help with responding to and recovering from disruptive situations. Disruptive occurrences are those that render ARA Group unable to perform one or more important business operations. BCPs are initiated when the duration of the disruption is expected to exceed the maximum acceptable downtime (MAO) for the function(s).

To facilitate the resumption or continuation of critical business operations during emergency and calamity situations, BCPs may also be implemented in adverse events. BCPs ensure that the business unit can accomplish its critical objectives during these occurrences by collaborating with other plans, such as IT disaster recovery plans and sub-plans including emergency response plans.

## 2. Definitions

- a) **Business Impact Analysis (BIA):** Process of determining the criticality of business processes and associated information assets for continuity of business operations during and after a business disruption.
- b) **Maximum Acceptable Outage (MAO):** Maximum acceptable length of time that a business process can be unavailable before the business faces negative consequences.
- c) **Recovery Time Objective (RTO):** Maximum acceptable length of time that a business function can be down after a disruption event.

## 3. Procedure

### 3.1 Step 1 – Identify Co-ordination Areas

At least annually or earlier if required, BCM Owners are to:

- a) identify business processes which are to complete a BIA; and
- b) nominate Deputy BCP Leads and BCM Coordinator(s) for their business unit.

### 3.2 Step 2 – Identify Business Processes

The BCM Owner with support from BCM Coordinator(s) are to use the BCM Tool provided to record business processes within their area of responsibility that may be impacted by a disruptive event and identify the function's activities, including:

- a) business-as-usual activities; and
- b) activities required from the function in a response situation.

### 3.3 Step 3 – Conduct BIAs

BCM Owners with support from BCM Coordinator(s) are to:

- a) assess the potential consequences of the loss of the identified activities, in a worst-case scenario, against the selected criteria in the BCM Tool;
- b) determine interdependencies, the MAOs, RTOs and its general activation priority within a disruptive event (within the context of the coordination area);
- c) determine staff, technology systems and infrastructure required for continuation or resumption in a disruptive event management and vital records; and
- d) classify non-critical functions and provide additional information to contextualise the assessment.

When new BIA(s) are approved by the BCM Owner, BCM Coordinator(s) are to arrange for BCM Steering Committee endorsement and ARA Group Executive Management approval.

Each business process will be allocated a criticality rating following the BIA as per **Table 1**.

**Table 1:** Business process criticality

Criticality	Description
<b>Tier 1 – Critical</b>	<ul style="list-style-type: none"> <li>• Critical to business operations.</li> <li>• Limited or no workaround processing.</li> <li>• Must be restored within 4 hours.</li> </ul>
<b>Tier 2 – Essential</b>	<ul style="list-style-type: none"> <li>• Essential in supporting critical business operations.</li> <li>• Workaround processes for a limited period</li> <li>• Can be restored within 12 hours but may take longer.</li> </ul>
<b>Tier 3 – Non-critical</b>	<ul style="list-style-type: none"> <li>• Not critical to business operations.</li> <li>• Workaround processes for an extended period where required.</li> <li>• Can be restored within 24 hours but may take longer.</li> </ul>

### 3.4 Step 4 – Develop BCPs

The BCM Owner with support from BCM Coordinator(s) are to develop BCP(s) following approval of the BIA. For each critical business process, the following activities are to be completed for BCP development:

- a) identify response strategies for continuation or resumption, which cater for impacts to staff, technology systems and infrastructure;
- b) tailor BCPs to address the nature, scale, impact, and duration of the disruptive event, including:
  - identifying functions that need to be prioritised for activation or can be deferred;
  - applying the most appropriate plan strategies e.g., building access is restricted, it may be appropriate to use different work locations or change how the service is delivered;
- c) provide input into communication planning, addressing needs of critical (within a critical business function) and non-critical staff, interdependent functions and other relevant stakeholders;
- d) arrange for the recording of stakeholder contacts (departmental and external);
- e) provide additional detail on interdependencies and vital records;
- f) report status to maintain situational awareness;
- g) escalate issues and risks, as required;
- h) be cognisant of staff wellbeing and manage fatigue e.g., employing backup staff and deferring non-critical work;
- i) document the activation process of BCPs; and
- j) record, as part of an incident log, BCP activation and other important information, which may include, functions deferred, activities undertaken, decisions made, and controls and actions implemented.

The BCM Owner with support from BCM Coordinator(s) is to:

- a) establish a schedule for the testing of BCPs in the business area of their responsibility;
- b) arrange consultation with BCM Owners in interdependent areas to ensure the requirements of BCPs in their area of responsibility, are understood and achievable; and
- c) arrange for BCM Steering Committee endorsement and ARA Group Executive Management approval of BCPs.

### 3.5 Step 5 – Develop BCP Kits

The BCM Owner with support from BCM Coordinator(s) is to develop fit-for-purpose BCP kits are to support BCP activation. When an ARA Group offices and sites are inaccessible, damaged or evacuated and the business unit transfers its operations to an alternative site, the BCP Kit is to be prepared for each work group to ensure it can perform its significant activities.

- a) The BCP kit is to be stored in a location where it can be easily accessed or in a safe and secure location away from the main site.
- b) The BCP kit is to be safely and securely stored on-site or off-site (in another location).
- c) The BCP kit items are to be regularly checked, updated, and in a good working condition.
- d) Cash/credit cards may be needed for emergency expenditure.

Items to consider including in the BCP Kit are listed in **Table 2** below. The list is to be modified to suit the entity and its needs.

**Table 2:** BCP Kit documentation

Content	Description
<b>Site plan, including location of gas, electricity and water shut off points</b>	A laminated site plan that clearly shows the location of gas, electricity, and water shut off points.
<b>Business Continuity Plan</b>	A plan outlining procedure to ensure the continuity of critical business functions in the event of a disruption.
<b>Contact details of emergency services and local authorities</b>	A list of phone numbers for emergency services and local authorities.
<b>Contact details of employees</b>	A list of employee contact information, including home and mobile phone numbers and email addresses. It is also preferred to include contact information for staff relatives.
<b>Contact details of key customers and suppliers</b>	A list of contact information for key customers and suppliers.
<b>Contact details of utility companies</b>	A list of contact information for utility companies, such as gas, electricity, and water.
<b>Contact information and details of insurance coverage firms</b>	A list of contact information for insurance companies and details of insurance coverage.
<b>Engineering plans and drawings</b>	Plans and drawings related to engineering, including blueprints and schematics.
<b>Emergency Response Plan</b>	A plan outlining procedure for evacuating the facility in the event of an emergency.
<b>Financial and banking data</b>	Financial and banking data related to the company, such as balance sheets and banking information.
<b>Curriculum and trade secrets</b>	Confidential information related to the company's curriculum and trade secrets.
<b>Latest inventory of supplies, stock, and equipment</b>	An up-to-date inventory of supplies, stock, and equipment that the company has on a permanent basis.
<b>Product and specification lists</b>	Lists of products and their specifications.

Content	Description
<b>Stationary with letterhead, company seals and documents</b>	Company stationery that includes letterhead, company seals, and other relevant documents.
<b>Legal documents</b>	Important legal documents, such as contracts and agreements.
<b>IT infrastructure documentation</b>	Documentation related to the company's IT infrastructure, including network diagrams and software licenses.
<b>Safety procedures</b>	Procedures related to workplace safety, including fire safety and hazardous materials handling.
<b>Building security information</b>	Information related to building security, such as alarm codes and access control systems.

**Table 3:** BCP Kit equipment

Content	Description
<b>Computer back-up media / disks / USB memory sticks or flash drives</b>	Electronic storage devices used to back up and secure important data and information in case of system failure or data loss.
<b>Disposable cameras (for recording evidence in an insurance claim)</b>	Cameras used to take photos of damages and losses for insurance purposes.
<b>Dust and toxic fume masks</b>	Masks used to protect personnel from inhaling harmful substances or dust during clean-up and recovery operations.
<b>General stationery (pens, paper, etc.)</b>	Basic office supplies used for record-keeping and documentation during recovery operations.
<b>Hazard and cordon tape</b>	Tape used to demarcate hazardous areas and create barriers for safety reasons.
<b>Loud Hailer (batteries to be kept sealed until used)</b>	A handheld device used to amplify and broadcast voice messages during emergency situations.
<b>Marker pens (for temporary signs)</b>	Pens used to create temporary signs for labelling, directing or indicating areas during recovery operations.
<b>Message pads and flip chart paper</b>	Writing materials used for notetaking, brainstorming and presentation during meetings and debriefings.
<b>Mobile telephone with credit available, plus charger</b>	A mobile device used for communication during emergencies, with a charged battery and available credit for making calls or sending messages.
<b>Radio (batteries to be kept sealed until used) – consider wind up type</b>	A portable communication device used for staying connected and receiving updates during recovery operations, with charged batteries or the option to wind up for power.
<b>Small toolkit (hammer, wrench, screwdriver and spanner set)</b>	Basic tools used for minor repairs and maintenance work during recovery operations.
<b>Spare keys</b>	Backup keys for essential locks and access points, to avoid being locked out of important areas during recovery operations.

Content	Description
<b>Torch – consider wind up type</b>	A handheld device used for lighting up dark areas during recovery operations, with the option to wind up for power.
<b>Voice recorder</b>	A device used for recording voice messages, conversations, and meetings during recovery operations, for documentation and reference purposes.

### 3.6 Step 6 – Exercise, Test, and Improve BCPs

The BCM Owner with support from BCM Coordinator(s) is to:

- a) maintain the currency of BCP and kits, including organising for the test of call trees and updating of stakeholder contact lists at least quarterly;
- b) exercise or test their BCP(s) with staff with a role in disruptive event management according to the program and schedule in **Table 4** below to build and maintain capability and ensure the plan is effective under different disruptive event scenarios. Note that activation of BCPs in a disruptive event contributes to annual requirements;
- c) record testing activities on the testing and activation log provided in the BCM Tool;
- d) identify lessons learned in exercises, tests and activations and use these to improve responses and plans;
- e) seek approval from the BCM Steering Committee for completed tests, recorded activations and changes made, and update the date approved information.

**Table 4:** Training program

Component	Description	Schedule
<b>Emergency Response Plan Orientation</b>	Introduction to the emergency response plan, including an overview of its purpose, scope, and key features	Within 1 month of hire or assignment to the emergency response team.
<b>Special Needs Training</b>	Training for personnel to effectively assist people with special needs during an emergency, including those with physical, cognitive impairments of language barriers	Updated annually or as needed.
<b>Tabletop Exercise</b>	Simulation of a hypothetical emergency scenario to test the effectiveness of the BCP and familiarise personnel with their roles and responsibilities.	Annually or as needed
<b>Functional Exercise</b>	Real time simulation of an emergency scenario to test the effectiveness of the BCP and evaluate the performance of personnel and equipment.	Every 3 years or as needed
<b>Communications Plans</b>	Include procedures for effective communication during emergencies, including how to contact emergency services, how to communicate with employees, and how to coordinate with external organisations	Included in the Emergency Response Plan and Training Program
<b>Compliance with Local Regulations</b>	Ensure that the emergency response plan and training program comply with local regulations.	Ongoing

Component	Description	Schedule
<b>Continual Improvement</b>	Conduct periodic drills and exercises to test the BCP components and identify areas for improvement, and review and update the BCP and training program regularly.	Ongoing
<b>Resource Allocation</b>	Allocate adequate resources, such as time, personnel, and equipment, to ensure that the BCP and training program are effective.	Ongoing
<b>Communications Plans</b>	Include procedures for effective communication during emergencies, including how to contact emergency services, how to communicate with employees, and how to coordinate with external organisations	Included in the Emergency Response Plan and Training Program

### 3.7 Activating a BCP

When a disruptive event is imminent or occurring, BCP Leads may need to activate one or more BCPs to address the nature, scale, impact, and duration of the event. The BCP Lead is to assess risks, including:

- a) the location and extent of the disruption;
- b) the capacity of the team(s) to manage the impact of the disruption within existing capability; and
- c) the timing of the disruption (for example, during peak periods for the function).

#### Disruption of the Business Function

BCP(s) are to be activated by the BCM Lead:

- a) when critical business processes are unable to be performed effectively;
- b) the period of disruption is likely to exceed the MAO for the processes; and
- c) coordination is required to prioritise activation and resources and liaise with interdependent functions, including those providing resources.

#### Disruption of Supporting Business Function

BCP(s) are to be activated by the BCM Lead:

- a) when a critical business function providing resources for their business unit communicates that an outage is likely to occur; and
- b) if multiple critical business functions are impacted and information is provided that justifies activation.

#### Disaster or Emergency:

When a disaster or emergency is imminent or occurring the Crisis Management Team (CMT) lead and members with a lead role in crisis response are to prioritise the safety individuals.

When risks associated with the immediate impact of the event are managed, CMT leads are to:

- a) direct the activation of BCPs and their priority for continuation or resumption within the affected area;
- b) allocate operational resources to support the BCPs in consultation with BCP Leads providing resources;
- c) work with BCP Leads and Deputy BCP Leads to manage business continuity;
- d) facilitate the transition to alternate delivery models, as required;
- e) manage the continuity of learning in alternate delivery models, as required; and,
- f) report information and escalate issues and risks, as required.

BC Lead(s) and Deputy BCP Lead(s) are to:

- a) follow the direction of the CMT leads regarding activation of BCPs;
- b) monitor implementation of plans, report information and escalate issues and risks, as required; and
- c) act as a single point of contact for BCM matters for their area of responsibility.

Following the conclusion of the crisis response, BCPs may remain activated due to flow on effects from the disaster or emergency event an inability to immediately return to business as usual. In these circumstances, leadership of BCPs is transferred from CMT lead(s) to the BCM Owner.

### **3.8 Transition to business as usual**

For directing recovery activities and operations, BCP Lead(s) with support from Deputy BCP Lead(s) are to:

- a) prioritise resumption and recovery of resources and functions according to risk;
- b) consider access to enabling resources (staff, technology systems and infrastructure resources);
- c) manage recovery at a scale appropriate to the impact of the event;
- d) be cognisant of staff wellbeing and manage fatigue (e.g., rotating and providing additional staff to address workload demands created by strategies used in response, or in addressing delays or backlogs of work for deferred functions and activities);
- e) conduct a post-event debrief focused on what happened, what did, and did not go well, and identify lessons to improve plans and actions in response and recovery; and
- f) if required, contribute to an event review, which may be self-determined or requested, to identify and leverage lessons across the system.

The BCM Steering Committee is to:

- a) provide ongoing management and oversight of departmental recovery activities;
- b) oversee and contribute to post-event reviews; and
- c) contribute to implementation of recommendations from reviews and leverage lessons learned.

## **4. Related Documents**

1. Business Continuity Management System Manual.
2. Business Continuity Management Policy.
3. Business Continuity Plan(s).