

Industrial Investment Trust Limited

BUSINESS CONTINUITY PLAN & DISASTER RECOVERY POLICY

March 10, 2021

Section I: Introduction

A. How to Use This Plan

In the event of a disaster which interferes with Industrial Investment Trust Limited (Henceforth referred to as 'the company')'s ability to conduct business from its head office, this plan is to be used by the responsible individuals to coordinate the business recovery of their respective areas and/or departments. The plan is designed to contain, or provide reference to, all of the information that might be needed at the time of a business recovery.

Acronyms: (ERT) Emergency Response Team – (BCP) Business Continuity Plan – (IT) Information Technology

B. Objectives

The objective of the Business Continuity Plan is to coordinate recovery of critical business functions in managing and supporting the business recovery in the event of a facilities (office building) disruption or disaster. This can include short or long-term disasters or other disruptions, such as fires, floods, earthquakes, explosions, terrorism, tornadoes, extended power interruptions, hazardous chemical spills, and other natural or man-made disasters.

A disaster is defined as any event that renders a business facility inoperable or unusable so that it interferes with the organization's ability to deliver essential business services.

The priorities in a disaster situation are to:

- 1. Ensure the safety of employees and visitors in the office buildings. (Responsibility of the ERT)
- 2. Mitigate threats or limit the damage that threats can cause. (Responsibility of the ERT)
- 3. Have advanced preparations to ensure that critical business functions can continue.
- 4. Have documented plans and procedures to ensure the quick, effective execution of recovery strategies for critical business functions.

The Business Continuity Plan includes procedures for all phases of recovery as defined in the Business Continuity Strategy section of this document.

C. Scope

The Business Continuity Plan is limited in scope to recovery and business continuance from a serious disruption in activities due to non-availability of the company's facilities. The Business Continuity Plan includes procedures for all phases of recovery as defined in the Business Continuity Strategy of this document. This plan focuses on the recovery of technology facilities and platforms, such as critical applications, databases, servers or other required technology. Unless otherwise modified, this plan does not address temporary interruptions of duration less than the time frames determined to be critical to business operations.

The scope of this plan is focused on localized disasters such as fires, floods, and other localized natural or man-made disasters. This plan is not intended to cover major regional or national disasters such as regional earthquakes, war, or nuclear holocaust. However, it can provide some guidance in the event of such a large scale disaster.

D. Changes to the Plan/Maintenance Responsibilities

Maintenance of the Business Continuity Plan is the joint responsibility of the management, the respective Departments, and all the employees.

Management is responsible for:

- 1. Periodically reviewing the adequacy and appropriateness of its Business Continuity strategy.
- 2. Assessing the impact on the Business Continuity Plan of additions or changes to existing business functions, procedures, equipment, and facilities requirements.
- 3. Keeping recovery team personnel assignments current, taking into account promotions, transfers, and terminations.
- 4. Communicating all plan changes to the respective departments so that the organization's Disaster Recovery Plan can be updated.

IT Department is responsible for:

- 1. Maintaining and/or monitoring offsite office space sufficient for critical functions and to meet the recovery time frames.
- 2. Communicating changes in the "Organization Disaster Recovery Plan" that would affect groups/departments to those groups/departments in a timely manner so they can make any necessary changes in their plan.
- 3. Communicating all plan changes to the employees so that the master plan can be updated.

E. Plan Testing Procedures and Responsibilities

Management is responsible for ensuring the workability of their Business Continuity Plan. This should be periodically verified by active or passive testing.

F. Plan Training Procedures and Responsibilities

Management is responsible for ensuring that the personnel who would carry out the Business Continuity Plan are sufficiently aware of the plan's details. This may be accomplished in a number of ways including; <u>practice exercises</u>, <u>participation in tests</u>, and <u>awareness programs conducted by the Management</u>.

Business Continuity Strategy

A. Introduction

This section of the Business Continuity Plan describes the strategy devised to maintain business continuity in the event of a facilities disruption. This strategy would be invoked should the company's primary facility somehow be damaged or inaccessible.

B. Business Function Recovery Priorities

The strategy is to recover critical business functions at the alternate site location. This can be possible if an offsite strategy has been put into effect by Office Services and Disaster Recovery/IT Teams to provide the recovery service. Information Systems will recover IT functions based on the critical departmental business functions and defined strategies.

C. Relocation Strategy and Alternate Business Site

In the event of a disaster or disruption to the office facilities, the strategy is to recover operations by relocating to an alternate business site. The short-term strategies (for disruptions lasting two weeks or less), which have been selected, include:

Primary Location	Alternate Business Site
Office No.101A, 1st Floor,	To be finalised
B Wing, 'The Capital', G	
Block, Plot No.C70, BKC,	
Bandra East, Mumbai	
400051	

For all locations, if a long-term disruption occurs (i.e. major building destruction, etc.); the above strategies will be used in the short-term (less than two weeks). The long-term strategies will be to acquire/lease and equip new office space in another building in the same metropolitan area.

D. Recovery Plan Phases

The activities necessary to recover from the company facilities disaster or disruption will be divided into four phases. These phases will follow each other sequentially in time.

1. Disaster Occurrence

This phase begins with the occurrence of the disaster event and continues until a decision is made to activate the recovery plans. The major activities that take place in this phase includes: **emergency response measures**, **notification of management**, **damage assessment activities**, and **declaration of the disaster**.

2. Plan Activation

In this phase, the Business Continuity Plans are put into effect. This phase continues until the alternate facility is occupied, critical business functions reestablished, and computer system service restored to the company's Departments. The major activities in this phase include: notification and assembly of the recovery teams, implementation of interim procedures, and relocation to the secondary facility/backup site, and re-establishment of data communications.

3. Alternate Site Operations

This phase begins after secondary facility operations are established and continues until the primary facility is restored. The primary recovery activities during this phase are backlog reduction and alternate facility processing procedures.

4. Transition to Primary Site

This phase consists of any and all activities necessary to make the transition back to a primary facility location.

E. Sensitive and Important Data Backup

All important data for that would be affected by facilities disruption are maintained and controlled by Disaster Recovery/IT. Some of these files are periodically backed up and stored at an offsite location as part of normal operations.

All vital documents are typically located in files within the office complex and the most current back-up copies are in a secure off-site storage facility (updated on weekly basis).

F. Restoration of Hardcopy Files, Forms, and Supplies

In the event of a facilities disruption, critical records located in the office may be destroyed or inaccessible. In this case, the last backup of critical records in the secure warehouse would be transported to the secondary facility. The amount of critical records, which would have to be reconstructed, will depend on when the last shipment of critical records to the offsite storage location occurred.

<u>Arrangement of the frequency of rotation of critical records to the offsite</u> storage site.

The following categories of information can be exposed to loss:

- 1. Any files stored on-site in file cabinets and control file rooms.
- 2. Information stored on local PC hard drives.
- 3. Any work in progress.
- 4. Received and un-opened mail.
- 5. Documents in offices, work cubes and files.
- 6. Off-site records stored in the Records Warehouse (if this is not a secure, hardened facility).

A. Purpose and Objective

This section of the plan identifies who will participate in the recovery process for the Business Continuity Plan. The participants are organized into one or more teams. Individual members can be appointed by the management at the immediate time of execution of the plan; however clear guidelines as to who should be assigned with tasks are described here. Each team has a designated team leader and an alternate for that person. Other team members are assigned either to specific responsibilities or as team members to carry out tasks as needed.

The information in this section is organized into several subsections.

Recovery Team is responsible for oversight of the recovery functions.

B. Recovery Team Assignments

This section identifies the team roles and the specific responsibilities that have been assigned to the team.

Team leader - (A senior executive, CEO or Director) Overall coordination of Recovery Team

Team Members/Departmental Heads – (Heads of all the departments)

Overseeing specific department's work progress

All employees of the organization - Executing instruction given by the team leader/Departmental Heads.

C. Personnel Notification

This section specifies how the team members are to be notified if the plan is to be put into effect by identifying who calls whom, and in what order.

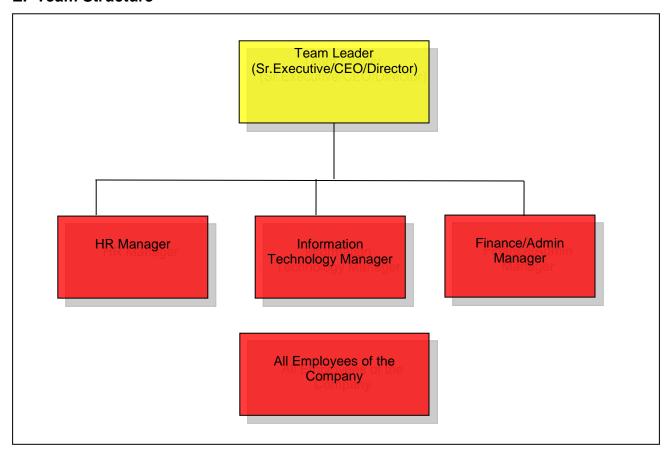
References: Employee Telephone Lists

D. Team Contacts

This section identifies other people or organizations outside of the Team who might need to be contacted during the recovery process. Their names and telephone numbers are provided.

Reference: Employee Telephone Lists

E. Team Structure



F. Responsibilities

Team Leader -

In the event of a disaster, the Business Continuity Team Leader is responsible for ensuring that the following activities are successfully completed:

- Works with the company's Management to officially declare a disaster, and start the Disaster Recovery/Business Continuation process to recover the company's business functions at an alternate site.
- Alert the company's Senior Management that a disaster has been declared.
- Assist in the development of an official public statement concerning the disaster. The company's Team Leader is the only individual authorized to make public statements about organization affairs.
- Monitor the progress of all Business Continuity and Disaster Recovery teams daily.
- Present Business Continuity Plan recovery status reports to Senior Management on a daily basis.
- Interface with appropriate work management personnel throughout the recovery process.
- Communicate directions received from the company's Senior Management to the Departmental heads.
- Provide on-going support and guidance to the Business Continuity teams and personnel.
- Review staff availability and recommend alternate assignments, if necessary.
- Work with the company's Senior Management to authorize the use of the alternate recovery site selected for re-deploying critical the company resources.
- Review and report critical processing schedules and backlog work progress, daily.
- Ensure that a record of all Business Continuity and Disaster Recovery activity and expenses incurred by the company is being maintained.

Human Resources Dept. -

This dept. is responsible for:

- Providing information regarding the disaster and recovery efforts to employees and families.
- Assisting in arranging cash advances if out of area travel is required.
- Notifying employee's emergency contact of employee injury or fatality.
- Ensuring the processing of all life, health, and accident insurance claims as required.
- Coordinates temporary organization employee requests.

Administration Dept. -

This team is responsible for:

- Ensuring the recovery/restoration personnel has assistance with clerical tasks, errands, and other administrative activities.
- Arranging for the availability of necessary office support services and equipment.
- Providing a channel for authorization of expenditures for all recovery personnel.
- Arranging travel for employees.
- Tracking all costs related to the recovery and restoration effort.
- Identifying and documenting when repairs can begin and obtaining cost estimates.
- Determining where forms and supplies should be delivered, based on damage to the normal storage areas for the materials.
- Contacting vendors to schedule specific start dates for the repairs.
- Taking appropriate actions to safeguard equipment from further damage or deterioration.
- Coordinating the removal, shipment, and safe storage of all furniture, documentation, supplies, and other materials as necessary.
- Supervise all salvage and cleanup activities.
- Coordinating required departmental relocations to the recovery sites.
- Coordinating relocation to the permanent site after repairs are made

 Assuring that arrangements are made for meals and temporary housing facilities, when required, for all recovery personnel.

IT Dept. -

This Dept. is responsible for:

- Activating the Recovery Plan (See also Disaster Recovery Plan).
- Managing the IT disaster response and recovery.
- Mobilizing and managing IT resources.
- Coordinating all communications related activities, as required, with telephone & data communications, PC, LAN support personnel, and other IT related vendors.
- Assisting, as required, in the acquisition and installation of equipment at the recovery site.
- Ensuring that special order equipment and supplies are delivered to teams as requested.
- Participating in testing equipment and facilities.
- Participating in the transfer of operations from the alternate site as required.
- Coordinating IT setup at the recovery site.
- Coordinating and performing restoration or replacement of all desktop PCs, LANs, telephones, and telecommunications access at the damaged site.
- Coordinating Disaster Recovery/IT efforts between different departments in the same or remote locations.
- Training Disaster Recovery/IT Team Members.
- Keeping Senior Management and the Team Leader appraised of recovery status.

Recovery Procedures

Recovery Activities and Tasks

PHASE I: Disaster Occurrence

ACTIVITY: Emergency Response and Emergency Operations Center Designation

ACTIVITY IS PERFORMED AT LOCATION: Main Office

ACTIVITY IS THE RESPONSIBILITY OF THIS TEAM: All Employees

TASKS:

- 1. After a disaster occurs, quickly assess the situation to determine whether to immediately evacuate the building or not, depending upon the nature of the disaster, the extent of damage, and the potential for additional danger.
- Quickly assess whether any personnel in your surrounding area are injured and need medical attention. If you are able to assist them without causing further injury to them or without putting yourself in further danger, then provide what assistance you can and also call for help. If further danger is imminent, then immediately evacuate the building.
- 3. If appropriate, evacuate the building in accordance with your building's emergency evacuation procedures. Use the nearest stairwells. Do not use elevators.
- 4. Check in with your department manager for roll call. This is important to ensure that all employees are accounted for.

ACTIVITY: Notification of Management

ACTIVITY IS PERFORMED AT LOCATION: At Any Available Phone

ACTIVITY IS THE RESPONSIBILITY OF: Team Leader

- 1. Team leader informs the members of the management team and notifies the senior management if they have not been informed.
- 2. Depending upon the time of the disaster, personnel are instructed what to do (i.e. stay at home and wait to be notified again, etc.)

ACTIVITY: Preliminary Damage Assessment

ACTIVITY IS PERFORMED AT LOCATION: Main Office Location ACTIVITY IS THE RESPONSIBILITY OF: Administration Dept.

- 1. Contact the Team Leader to determine responsibilities and tasks to be performed by the Departments or employees.
- 2. If the Team requests assistance in performing the Preliminary Damage Assessment, caution all personnel to avoid safety risks as follows:
 - Enter only those areas the authorities give permission to enter.
 - Ensure that all electrical power supplies are cut to any area or equipment that could possess a threat to personal safety.
 - Ensure that under no circumstances is power to be restored to computer equipment until the comprehensive damage assessment has been conducted, reviewed, and authority to restore power has been expressly given by the Emergency Management Team.
- 3. Inform all team members that no alteration of facilities or equipment can take place until the Risk Management representatives have made a thorough assessment of the damage and given their written agreement that repairs may begin.
- 4. Instruct the Team Leader to deliver the preliminary damage assessment status report immediately upon completion.
- 5. Facilitate retrieval of items (contents of file cabinets -- petty cash box, security codes, network backup tapes, control books, etc.) needed to conduct the preliminary damage assessment.
- 6. Ensure that administrative support is available, as required.
- 7. Arrange a meeting with the Team and other GROUPS/DEPARTMENTS in your facility (location) to review the disaster declaration recommendation that results from the preliminary damage assessment and to determine the course of action to be taken. With this group, determine the strategy to recommend to Senior Management (the Team Leader will be responsible for communicating this to Senior Management).

ACTIVITY: Declaration of a Disaster

ACTIVITY IS PERFORMED AT LOCATION: Main Office Location or Alternate Site

ACTIVITY IS THE RESPONSIBILITY OF: Team Leader

- Actual declaration of a disaster is to be made by the Team Leader, after consulting with senior management. The Team should wait for notification from the Team Leader that a disaster has occurred and that groups/departments are to start executing their Business Continuity Plans and relocate to their Alternate Business Site Location.
- 2. The person contacted verifies that the caller is someone who is authorized to do the notification.
- 3. The person contacted notifies the Senior Management, if they have not yet been contacted.
- 4. Because of the significance, disruption, and cost of declaring a disaster, appropriate facts should be gathered and considered before making the decision to declare a disaster. Individual groups/department personnel or the respective dept. should not unilaterally make a decision to declare a disaster. This is responsibility of the Team Leader.

PHASE II: Plan Activation

ACTIVITY: Notification and Assembly of Recovery Teams and Employees

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site ACTIVITY IS THE RESPONSIBILITY OF: Team Leader

- 1. The team leader calls each member of the team, instructs them of what time frame to assemble at the Emergency Operations Center (to be decided at the time), and to bring their copies of the Plan. The location(s) of the EOC are designated in Emergency Operations Center (EOC) Locations. The EOC may be temporarily setup at any one of several optional locations, depending on the situation and accessibility of each one. Once the Alternate site is ready for occupancy the EOC can move to that location, if preferred.
- 2. Review the recovery strategy and action plan with the assembled team.
- 3. If necessary, adjust the management team assignments based on which members are available.
- 4. The Team contacts critical employees and tells them to assemble at the alternate site. Non-critical employees should be instructed to stay at home, doing what work is possible from home, until notified otherwise.
- 5. In the event of a disaster that affects telecommunications service regionally, the Team should instruct critical employees to proceed to the alternate site even if they have not been contacted directly. Delays in waiting for direct communications can have a negative impact on the company's ability to recover vital services.

ACTIVITY: Relocation to Alternate Site

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site

ACTIVITY IS THE RESPONSIBILITY OF: All Critical Personnel

- 1. Make arrangements to commute or travel to the alternate site.
- 2. The Management Team needs to consult with the Team Leader to determine if access can be gained to the primary (damaged) site to retrieve vital records and other materials. The Team will only allow access to the primary site if the authorities grant access. This will be dependent upon the nature of the disaster and the extent of damage.
- 3. If allowed access to the primary site to retrieve vital records and other materials, **perform some pre-planning to determine what is most important to retrieve**. This may be necessary since the time you may be allowed access to the primary site may be minimal.
- 4. Depending on the amount of vital records and other materials you are able to retrieve from the primary site, make arrangements to transport this material to the alternate site. If the material is not too great, this could be accomplished by giving to employees to carry along with them. If the material is a large amount, then make arrangements for transport services and/or overnight courier services.
- 5. Management and critical employees travel to alternate site.

ACTIVITY: Implementation of Interim Procedures

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site

ACTIVITY IS THE RESPONSIBILITY OF: Administration Dept./HR Dept./IT Dept.

- After arrival at the alternate site, map out locations that can be used for workspace. This should include unused offices and cubicles, conference rooms, training rooms, lunch/break areas, and open space in hallways or in other areas.
- 2. Obtain additional tables and chairs, either from the office or from outside rental agencies to provide additional workspace. Place in any available open areas, but be cautious of not blocking exits for fire evacuation purposes.
- 3. **Determine flexible working schedules for staff** to ensure that client and business needs are met, but also to enable effective use of space. This may require that some employee's work staggered shifts or may need to work evening or nightshifts.
- Gather vital records and other materials that were retrieved from the primary site and determine appropriate storage locations, keeping in mind effectiveness of workgroups.
- 5. Determine which vital records, forms, and supplies are missing. Obtain from off-site storage location or from other sources, as needed.
- 6. Developed prioritized work activities, especially if all staff members are not available.

ACTIVITY: Restoring Data Processing and Data Communications with Primary or Secondary Backup Data

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site ACTIVITY IS THE RESPONSIBILITY OF THIS TEAM: IT Dept.

- If your alternate site is another the company office, determine if that site has
 access to the computer systems that organization uses. If so, work with local
 management to determine how workstations can be shared between personnel
 from their groups/departments. This may involve using flexible hours or multiple
 shifts for your personnel.
- 2. Decide when and how replacement PC's and/or terminals will be provided to you at the alternate site and when they will be connected.
- 3. Decide the files from your normal PC/LAN servers and applications will be restored and how you can access those files. Also, work with other personnel at your alternate site to discuss using their LAN servers.
- 4. Communicate the IT recovery status to all personnel who regularly use the systems.

PHASE III: Alternate Site Operations

ACTIVITY: Alternate Site Processing Procedures

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site ACTIVITY IS THE RESPONSIBILITY OF: All Employees

TASKS:

- 1. Communicate with customers regarding the disaster and re-solicit phone contacts.
- 2. Acquire needed vital documents
- 3. Access missing documents and files and reconstruct, if necessary
- 4. Set up operation

ACTIVITY: Manage work backlog reduction.

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site ACTIVITY IS THE RESPONSIBILITY OF: All Employees

- 1. Determine priorities for work backlogs to ensure the most important backlogged tasks are resolved first.
- 2. Set an overtime schedule, if required, based on staff and system availability.
- 3. Set backlog priorities, establish a backlog status reports if necessary, and communicate this to the supervisors.
- 4. Report the backlog status to the management on a regular basis.

PHASE IV: Transition to Primary Operations

ACTIVITY: Changing Telephone and Data Communications Back to Primary Site

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site

ACTIVITY IS THE RESPONSIBILITY OF: IT Dept.

TASKS:

- 1. Determine relocating back to the primary site. Verify that they have a schedule to ensure that telephone and data communications are rerouted accordingly.
- 2. Discuss when and how PC's, terminals, and printers, if brought into the alternate site, will be de-installed, moved back to the primary site and re-installed.

ACTIVITY: Terminating Alternate Site Procedures

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site and Primary Site

ACTIVITY IS THE RESPONSIBILITY OF: Team Leader

- 1. Determine which alternate site operating procedures will be suspended or discontinued and when.
- 2. Communicate the changes in procedures to all affected staff.
- 3. Determine if additional procedures are needed upon return to the primary site, such as to continue resolving work backlogs.

ACTIVITY: Relocating Personnel, Records, and Equipment Back to Primary (Original) Site

ACTIVITY IS PERFORMED AT LOCATION: Alternate Site and Primary Site ACTIVITY IS THE RESPONSIBILITY OF: Team Leader/ Departmental Heads

- 1. In conjunctions with the Team, determine when to relocate back to the primary site.
- 2. Communicate this schedule to all personnel.
- 3. Inventory vital records, equipment, supplies, and other materials, which need to be transported from the alternate site to the primary site.
- 4. Pack, box, and identify all materials to be transported back to the primary site.
- 5. In conjunction with the Administration Dept., make arrangement for a moving company or courier service to transport the boxes back to the primary site.

Employee Telephone Lists

Name	Contact No.	Designation	Company	Email
Reception	02243250100			
Board Room	02243250112			
Dr. B. Samal	02243250114	Executive Chairman	IITL	Dr.samal@iitlgroup.com
Mrs. Cumi Banerjee	02243250117	CEO & Company Secretary	IITL	Cumi banerjee@iitlgroup.com
Mr. Kamlesh Agrawal	02243250118	Group CFO	IITL	kamlesh@iitlgroup.com
Ms. Poonam Gupta	02243250119	Company Secretary	IITLPL	Poonam.gupta@iitlgroup.com
Mr. G. Jeevanantham	02243250120	HR Manager	IITL	jeeva@iitlgroup.com /hr@iitlgroup.com
Mrs. Reshma Salins	02243250121	Executive Secretary	IITL	reshma@iitlgroup.com
Mr. Yogesh Mhatre	02243250122	Assistant Manager – IT	IITL	yogesh@iitlgroup.com
Mr. Mehul Chauhan	02243250123	WTD	IITIL	mehul@iitlgroup.com
Mr. Sachin Shinde	02243250124	Assistant Manager Accounts	IITL	sachin@iitlgroup.com
Mr. Ajay Dey	02243250125	Sr. Accountant	IITLPL	ajay@iitlgroup.com
Mr. Aashish Sharma	02243250126	Company Secretary	IITIL	aashish@iitlgroup.com
Mrs. Sheela Gonsalves	02243250127	Executive Assistant	IITLPL	sheela@iitlgroup.com
Mr.Vishwanath	02243250128	Receptionist	IITL	
Ms. Manisha Bhagat	02243250129	Assistant Manager Accounts	IITL	manisha@iitlgroup.com
Mr. Fakira Swain	02243250130	Manager Accounts	IITLPL	fakira@iitlgroup.com