Business Continuity Management Policy for Growthpoint Properties

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If version 1.0 is revised, drafts are numbered as 1.1, 1.2, etc. until the **Final** version 2.0 is complete, and so on.

Plan Revision Control			
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1 BCM POLICY OVERVIEW

1.1 BCM Purpose

1.1.1 The purpose of this policy is to formalise the Business Continuity Management (BCM) programme for Growthpoint Properties (GPP) and to provide guidelines for developing, maintaining and exercising the Business Continuity Plans (BCPs) for all divisions/departments at Head Office, and the Regional Management Offices (Durban and Cape Town).

1.1.2 BCM is a process that provides a framework for building organisational resilience with the capability of building an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities.

1.1.3 This policy assures that there is a satisfactory level of business continuity to provide a level of protection from a range of threats, ensuring continuity of business operations, service delivery and maximising the return on investments of business interests.

1.1.4 This policy outlines the mission in relation to BCM and the effect of impacts or incidents on operational activities of GPP.

1.1.5 This policy also establishes the basic principles and framework necessary to ensure emergency response, resumption and recovery, restoration and permanent recovery of the operations and business activities during a business interruption event.

1.1.6 The BCM Policy serves as an overarching governing policy for the use, management and implementation of business continuity at GPP.

1.1.7 The BCM programme is considered an integral part of support to the management and mitigation of risks to the organisation. GPP makes every effort to ensure that it is protected against risks and threats that could materially impact its operations. However, it is recognised that the unexpected could and may happen, the effect of which could compromise the ability to meet acceptable standards of business. GPP is also committed to providing the best possible value to its customers and the best possible relationships with employees, shareholders and suppliers. For these reasons, a Business Continuity Management programme is implemented.

1.2 BCM Scope

1.2.1 The scope for the BCM programme within GPP will include employees, direct office buildings and services, processes and operations provided by Head Office and the Regional Management Offices (Durban and Cape Town).

1.2.2   GPP will be prepared for any impacts or scenarios including, but not limited to, natural disasters, power outages, loss of premises, equipment, technology, data or data corruption, key employees, critical suppliers, critical documentation, impacts to utility availability, or all the above.

1.3   BCM Objectives

The objectives of this policy are to support the BCM Programme:

1.3.1   To achieve a comprehensive BCM Programme that is formally established and maintained to support business resilience

1.3.2   To identify key products and services, their supporting critical activities, processes and resources

1.3.3   To ensure that business impact analyses, and operational risk assessments are applied to key GPP services and their supporting critical activities, processes and resources

1.3.4   To ensure that risk mitigation strategies are applied to reduce the impact of a disruption on key services

1.3.5   To ensure that plans are developed to ensure continuity of key services at a minimum acceptable standard following a disruption

1.3.6   The Invocation of business continuity plans is managed and executed effectively

1.3.7   To ensure that plans are subject to on-going exercising and revisions

1.3.8   To create and maintain a healthy and safe work environment, to ensure staff and customers' safety, welfare, and confidence.

1.3.9   To ensure that the interests of GPP key stakeholders, reputation and value creating activities are safeguarded

1.3.10   To enforce that all information is provided timeously and is available to all key resources necessary to operate critical business processes.

1.3.11   To ensure that compliance to all applicable regulatory and corporate governance requirements is adhered to (relating to business continuity)

1.3.12   To protect reputation, image and brand

1.3.13   To ensure that the BCMS remains up-to-date and fit-for-purpose

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1.3.14 This policy supports the implementation and maintenance of a comprehensive BCM programme, which aims to achieve the following objectives:

Figure 1.3.14.1 GPP Objectives

- 01 PROTECT THE STAKEHOLDER'S INTEREST
- 02 PROTECT THE REPUTATION AND IMAGE OF GROWTHPOINT PROPERTIES
- 03 PROTECT GROWTHPOINT PROPERTIES WORKFORCE AND SKILLS
- 04 ENSURE CONTINUOUS SERVICE DELIVERY
- 05 COMPLY WITH STATUTORY, REGULATORY AND CONTRACTUAL DUTIES

1.4 BCM Policy Governance

1.4.1 Through the approval of this policy, GPP Management demonstrates its commitment to BCM and the running of the business continuity programme.

1.4.2 Management will define the strategy for delivering the BCM provisions made by the BCM policy and give direction on how the programme of work will be prioritised, delivered, managed and maintained.

1.4.3 Management will ensure the provision of a formal budget to fund the resource requirements for an effective and well maintained BCM programme.

The table below outlines the roles and responsibilities of the stakeholders responsible for the governance of this Policy:

Table. 1.4.3.1 BCM Policy Governance

Structure	Interest, Duties and Responsibilities
Platinum: Board of Directors	The Board of Directors is ultimately responsible and accountable for ensuring that the appropriate business continuity management strategies, policies and plans are in place.
Platinum: South African Chief Executive Officer	The SACEO takes final responsibility and is accountable for the strategic direction of the BCM programme.
Strategic: Executive Top Management	Management is responsible and accountable for ensuring that all committees, forums and individuals are mandated under the Policy to fulfil their responsibilities.
	Management is responsible and accountable for operational implementation but delegates to the various operational forums or persons to address or monitor operational matters.

Internal Audit function	Internal Audit function is to conduct periodic reviews to provide independent assurance to the Board and executive management that the policies are implemented and followed.

1.5 BCM Policy Governance Structure and Framework

1.5.1 As per the ISO 22301:2018 (Societal security - Business continuity management systems – Requirements), standard requirement and corporate governance responsibilities, GPP has implemented an effective corporate governance structure and framework that demonstrates GPP's commitment to BCM. The current User Forum (Sub-Committee of the Risk Committee), will incorporate Business Unit heads from each department to address any BCM related issues.

1.5.2 This framework will consist of defined roles and responsibilities. Refer to **Annexure B.**

1.5.3 To ensure optimum performance of the BCM programme, all facets of the BCM programme including but not limited to Business Impact Analyses, BCM Strategy, Business Continuity Plans and Testing, will be subject to regular review processes at the intervals prescribed in Section 3.2

Figure 1.5.3.1 BCM Governance Structure & Framework

Note: Emergency response (ER) is out of scope of this project and is the responsibility of GPP, however, this structure will align to relevant ER procedures.

Note: TRPs – Technical Recovery Procedure
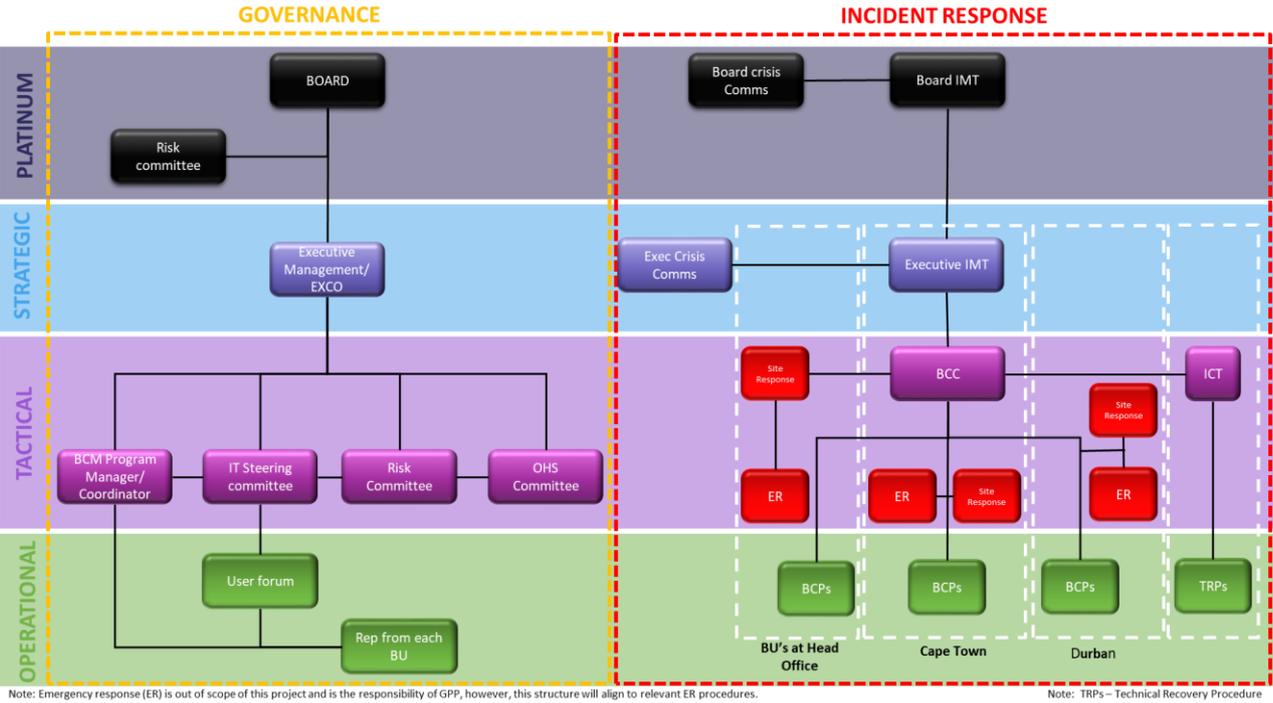
2 BCM METHODOLOGY

2.1 Alignment to International Standards

2.1.1 The BCM programme implementation and maintenance will be aligned to leading global BCM standards and guidelines.

2.1.2   Currently this includes the Business Continuity Institute Good Practice Guidelines (2018) and the ISO 22301:2018 (Societal security - Business continuity management systems – Requirements).

2.1.3   The BCM programme will be implemented and maintained in line with the Good Practice Guidelines 2018's BCM lifecycle:

Figure 2.1.3.1 Business Continuity Management (BCM) Lifecycle

3   BCM POLICY SUPPORTING STATEMENTS

3.1   BCM Programme

3.1.1   GPP is committed to its customers, employees and stakeholders to ensure that critical/ urgent services are resumed as soon as possible, in the event of any disruptive incident. It is also committed to making all necessary efforts to safeguard the life and safety of personnel deployed within its premises. Towards this, GPP will:

- Implement programmes that relates to Emergency Response and Incident (Crisis) Management, together with a Business Continuity Programme that aligns with the BCM methodology

- Use functional units and BCM teams within GPP, who will be responsible for maintaining current and comprehensive Business Continuity Plans

- Use functional units and BCM teams to ensure that these plans can support a minimum acceptable level of service

- Use functional units and BCM teams to review the constituent elements of the business continuity plan and ensuring that its effectiveness is tested on a regular basis

- Ensure that the functional units and BCM teams have detailed and defined roles and responsibilities, to ensure an effective recovery

3.2 BCM Review, Maintenance, and Framework Principles

3.2.1 Business **Continuity Management Policy:** A formal review of this policy will be carried out at least once a year by management.

3.2.2 **Business Impact Analysis (BIA):** A formal business impact analysis will be carried out at least once a year by management in order to determine or review the requirements for a Business Continuity Plan. Triggers, such as major changes in processes, technology or people will prompt an earlier BIA to be carried out, which will feed into a review and reassessment of the BCM Strategy and recovery solutions.

3.2.3 **Risk Assessment (RA):** A formal operational risk assessment to assess 'continuity' and 'availability' risks will be carried out at least once a year by management in order to determine risks that may impact the continuity of operations.

3.2.4 **Business Continuity Strategy:** A formal review of the business continuity strategy will be carried out at least once a year by management, to ensure the appropriateness of its recovery and continuity strategy.

3.2.5 **Business Continuity Plans (BCPs):** A formal review of the BCPs and the documented collection of procedures and information will be carried out at least once a year by management, to ensure their readiness for use in an incident, in order to enable functional teams to continue to deliver critical products and services, at an acceptable predefined level.

3.2.6 **Incident Management:** GPP will align to the existing incident management structure, based on nominated incident response personnel with the necessary responsibility, authority and competency to manage an incident. The organisation will also develop plans that detail how incidents are to be managed, a formal review and exercise that will be carried out at least once a year.

3.2.7 **BCM Testing:** The BCPs and recovery solutions will be exercised at least once a year, and modifications will be made where necessary.

3.2.8 **BCM Maintenance:** The BCPs will be continuously monitored to ensure that changes in the way business functions are incorporated and changes in the supporting infrastructure, are reflected in the Business Continuity Strategy, Procedures and Plan. Improvements

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identified as a result of testing and training will also be included in the BCPs. All changes will be assessed as part of change management.

3.2.9   **BCM Review:** The functional units and the BCM teams will conduct self-assessments bi-annually to ensure that the Business Continuity Plans are up to date.

3.2.10   **BCM Internal Audit:** Internal audit function will as part of their annual planning exercise, include BCM and plans for all applicable functions/functional units or for any ad-hoc reviews.

3.2.11   **BCM Awareness:** All staff, including temporary staff, will be made aware of the BCM Programme, policies and procedures through various awareness campaigns at least once a year.

3.2.12   **BCM Training:** Whereas awareness is generally targeted at all staff, training is directed at staff with specific BCM functions and responsibilities. Formal training will be conducted annually for all staff involved in the recovery so that they are equipped and adequately prepared with the necessary knowledge and skills to undertake recovery activities.

3.2.13   **Preventative Actions**: GPP will ensure that steps are taken to periodically conduct risk assessments and review the BCM policies, procedures and plans to identify potential non-conformities and their causes. This will be done in order to reduce or eliminate the chances for BCM failures. All such actions taken will be documented.

3.2.14   **Business Continuity of Key Service Providers:** GPP will ensure that the business continuity of key service providers is evaluated, concentrating its efforts on services whose failure would most quickly disrupt prioritised activities. Techniques may include specification of requirements in tenders and contracts, or periodic audits of suppliers BCPs.

3.2.15   **Corrective Actions:** GPP will take actions to eliminate the causes of nonconformities identified with the implementation and operation of the BCM programme, in order to prevent their recurrence. All such actions will be documented.

3.2.16   **Change Management:** All reviews of the various BCM elements will be conducted in line with the above policy statements, or earlier should there be any significant changes on the business ownership, locations, technical infrastructure, BCM roles, regulations or product lines/brands and services offered. All such changes will be documented.

4 REFERENCES TO RELATED POLICIES

Emergency Response is out of scope for this project and is the responsibility of GPP. However this Business Continuity Management policy aligns itself to the Occupational Health and Safety Act (1993) and all related GPP Emergency response policies, i.e.

- GPP's Occupational Health and Safety Document

- GPP's Health and safety in the workplace

- Emergency Evacuation Procedures for Head Office in Sandton, and the Regional Management Offices in both Durban and Cape Town.

5 REGULATORY AND RECOMMENDED BEST PRACTICE COMPLIANCE OF THIS POLICY

This Policy aligns itself to the following best practice and recommendations:

5.1   King IV report on Corporate Governance.

5.2   The board tasks executive management with the risk management design, implementation and monitoring of the risk management plan, and as per King IV – Risk Governance, Part 5 - The establishment and implementation of business continuity arrangements that allow the organisation to operate under conditions of volatility, and to withstand and recover from acute shocks.

5.3   ISO 22313:2020 (Societal Security – Business Continuity Management Systems – Guidance).

5.4   ISO 22301:2018 (Societal security - Business continuity management systems – Requirements).

5.5   The Business Continuity Institute Good Practice Guidelines of 2018.

6   ANNEXURE A: BCM DEFINITIONS, TERMS AND ACRONYMS

Term	Acronym	Definition
Analysis	PP3	The Technical Practice within the BCM Lifecycle that reviews and assesses an organization in terms of what its objectives are, how it functions and the constraints of the environment in which it operates.
Audits		Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled. Types: First Party/Third Party and Internal Audits
BCM Lifecycle		The stages of activity that an organization moves through and repeats with the overall aim of improving organizational resilience.
Business Continuity	BC	The capability of the organization to continue delivery of products or services at acceptable predefined levels following a disruptive incident. (Formerly known as Business Recovery)
Business Continuity Institute	BCI	The BCI is a Global Membership Institution for Business Continuity Professionals. The overall purpose is to promote the art and science of business continuity worldwide.
Business Continuity Management	BCM	A holistic management process that identifies potential threats to an organization and the impacts to business operations those threats, if realized, might cause, and which provides a framework for building organizational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities.
Business Continuity Management Programme		On-going management and governance process supported by Top Management and appropriately resourced to implement and maintain business continuity management. (This is the ISO definition for 'business continuity programme'.)
Business Continuity Plan	BCP	Documented procedures that guide organizations to respond, recover, resume and restore to a predefined level of operation following disruption.
Business Continuity Policy		The key document that sets out the scope and governance of the BCM programme and reflects the reasons why it is being implemented
Business Continuity Policy Statement		A business continuity policy statement is to communicate to interested parties the principles to which the organisation aspires. The primary purpose is communication. It should be short, clear, precise and to the point. A long-complicated BC policy statement will be a barrier to communication
Business Impact Analysis	BIA	Process of analysing activities and the effect a business disruption might have on them. (Note the GPG 2018 recommends that this is a four-stage process, starting with an Initial BIA followed by Strategic, Tactical and Operational level BIA's.)
Good Practice Guidelines	GPG	A Management Guide to Global good practice in Business Continuity. The Body of Knowledge produced by the Business Continuity Institute.

Incident/Disruption/Event/Interruption		Situation that might be, or could lead to, a disruption, loss, emergency or crisis. (Note: The GPG 2018 also refers to an incident as an event, interruption or disruption.)
Interested party stakeholder		Person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity.
Organisational resilience	OR	The capability to anticipate key events from emerging trends, constantly adapt to change and to bounce back from disruptive and damaging incidents.

7 ANNEXURE B: BCM PROGRAMME MANAGEMENT – TEAMS, ROLES & RESPONSIBILITIES

Consider using a table to display the below information

	Overview	Team Leader	Deputy	Member
Platinum: GPP Board				
Strategic Level: Incident Management				
Strategic Level: Crisis Communications				
Tactical Level: Business Continuity Manager/Coordinator				
Tactical Level: IT Recovery Coordinator				
Tactical Level: Site Response Coordinator/Damage Assessment Teams for Head Office (Sandton), Durban and Cape Town				
Tactical Level: BCM Steering Committee (User Forum)				
Operational Level: Departmental Business Continuity Coordinator (Operational Response Teams)				

7.1 Platinum Level: GPP Board

Overall accountability and responsibility for the BCM Programme/Continuity of GPP.

7.2 Strategic Level: Incident Management

Accountability and responsibility for the BCM Programme/continuity of GPP.

7.2.1 Team Leader

- Appoint a BCM Programme Manager/Coordinator(s), if required
- Assist in appointing Business Unit BCM Unit/Operational Response Team Leaders; if required
- Define the BCM scope
- Approve the BCM budget
- Invoke the BCPs
- Monitor the performance of the BCM Programme
- Promote BCM within GPP
- **In the event of an incident: Decision making and management of the recovery process**

7.2.2 Deputy

- The deputy function will be activated if the Team Leader cannot fulfil the roles and responsibilities defined above.

7.2.3 Member

- Promote BCM within GPP
- Support the BCM Programme and IMT
- Monitor the performance of the BCM Programme
- **In the event of an incident: Assist with the decision making and management of the recovery process**

7.3 Strategic Level: Crisis Communications

7.3.1 Team Leader

- Maintain the Crisis Communications Plan
- Maintain and enhance awareness within the organisation regarding crisis communications
- **In the event of an incident: Direct all crisis communications to assure stakeholders and limit potential damage to GPP's image and reputation**

7.3.2 Deputy

- The deputy function will be activated if the Team Leader cannot fulfil the roles and responsibilities as defined above.

7.3.3 Member

- Support the IMT and CMT

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7.4   Tactical Level: Business Continuity Manager/Coordinator

7.4.1   Team Leader

- Promote and enhance BCM within GPP
- Manage the BCM budget
- Ensure that the following results/documentation are reviewed and updated annually or in the event of significant organisational changes:
  - o   Business Impact Analysis (BIA)
  - o   Resource Requirements Analysis
  - o   Threat Assessments (TAs)
  - o   Business Continuity Plans (BCPs)
- Maintain all BCM documentation in conjunction with the ORT leaders
- Manage and maintain all the GPP's Battle Boxes in conjunction with the relevant areas
- Maintain and enhance awareness levels with regards to BCM with GPP
- Define the current state of BCM maturity within the GPP
- Provide support and guidance to Operational Team Leaders
- Manage the on-going programme management with regards to BCM
- Ensure that BCM assessments/audits are conducted
- **In the event of an incident: Coordinate the recovery process**

7.4.2   Deputy

- The deputy function will be activated if the Team Leader cannot fulfil the roles and responsibilities as defined above.

7.4.3   Member

- Support the BCC Team.

7.5   Tactical Level: IT Recovery Coordinator

7.5.1   Team Leader

- Manage the IT BCM budget
- Ensure that the following results/documentation are reviewed and updated annually or in the event of significant organisational changes:
  - o   Business Impact Analysis (BIA)
  - o   Resource Requirements Analysis
  - o   Threat Assessment (TA)
- Manage and maintain all the GPPs IT Battle Boxes
- Provide IT support and guidance to the Business Continuity Coordinator
- Ensure that the Technical Recovery Procedures are updated and maintained
- Enhance BCM awareness within the IT Business Unit
- Act as point of contact pertaining to IT BCM issues

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- Notify the BCM Coordinator/Manager/IMT regarding any changes pertaining to the departmental IT Recovery Coordinator Plan and/or IT recovery strategies, or infrastructure which could impact the recovery capability of the organisation
- Assist with the BCM testing process
- **In the event of an incident: Coordinate the recovery of critical IT systems/applications, at an alternate site(s), (if applicable), within the stipulated Recovery Time Objectives (RTOs) and the stipulated Recovery Point Objectives (RPOs) and support the BCC and/or Operational Response teams with recovering their critical business processes.**

7.5.2   Deputy

- The deputy function will be activated if the Team Leader cannot fulfil the roles and responsibilities as defined above.

7.5.3   Member

- Support the BCC and IT Recovery Coordinator Team.

7.6   Tactical Level: Site Response Coordinator/Damage Assessment Teams for Head Office (Sandton), Durban and Cape Town

7.6.1   Team Leader

- Maintain the Site Response/Damage Assessment plan
- **In the event of an incident:**
  o Evaluate the initial and final status of damage after an incident and provide status of damage to the building to the BCC
  o Assist with IT and insurance related assessments and claims
  o Assist the BCC to estimate the time to reoccupy the building and salvageability of any remaining equipment
  o Ensure that any relevant Insurance issues are addressed
  o Ensure that any relevant HR issues are addressed in conjunction with the Emergency Response teams
  o Keep track and ensure that any on-site media communications issues are addressed and provide feedback to the BCC (Internal & Media) Media could be in the form of:
    o Radio or newspaper reporters
    o Television or camera crews, etc.
  o Monitor, track and ensure onsite mail and courier issues are addressed and provide feedback to the BCC

7.6.2   Deputy

- The deputy function will be activated if the Team Leader cannot fulfil the roles and responsibilities as defined above.

7.6.3   Member

- Support the SR Team.

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7.7 Tactical Level: BCM Steering Committee (User Forum)

This is driven by executive top management. This will form part of the User Forum (Sub-Committee of the Risk Committee).

- To meet every month/quarterly to address any BCM issues
- Representatives from each BU should be appointed

7.8 Operational Level: Departmental Business Continuity Coordinator (Operational Response Teams)

7.8.1 Team Leader

Responsible for the following Business Continuity functions:
- Approval and management of the following results:
  o Business Impact Analysis (BIA)
  o Resource Requirements Analysis
  o Threat Assessment (TA)
  o Business Continuity Plans (BCPs)
- Approval and accountability with regards to the applicable Business Unit's Business Continuity Plan (BCP)
- Enhance BCM awareness within the applicable Business Unit
- Act as point of contact pertaining to BCM issues
- Notify the BCM Programme Manager regarding any changes pertaining to the departmental Business Continuity Plan (BCP)
- Assist with the BCM testing process
- **In the event of an incident: Coordinate the applicable Business Unit recovery process**

7.8.2 Deputy

- The deputy function will be activated if the Team Leader cannot fulfil the roles and responsibilities as defined above.

7.8.3 Member

- Support the Operational Team.

7.9 Letters of Appointment – Clause

GPP will incorporate relevant BCM roles and responsibilities into all new and current employee's Letters of Employment as a clause to their contracts, to ensure individuals understand their respective roles and responsibilities regarding the programme and how they can contribute to the effectiveness of BCM.

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