REPCO HOME FINANCE LIMITED

Administration Department

Corporate Office, Chennai

BUSINESS CONTINUITY PLAN
{other than IT Systems related}

June 2025

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1. Preamble

Repco Home Finance Limited (RHFL) is a housing finance company having pan India presence. It is catering to a large number of clients. The customer relation of RHFL is long term as the tenor of the loans exceed 10 years and above. There is need for constant interface with the customers for servicing their needs and for recovery of the money lent. Hence, there is need for seamless service in the interest of the customers as well as the Company. RHFL cannot afford to have disruption in service for long time as the consequences of such disruption may not only have adverse impact on the reputation of the Company but also have negative financial implications.

We may not be able to predict the disasters or disruptions that may occur. However, we may be able to manage the situations arising out of such disasters or disruptions if we have a robust contingency plans in hand and all the staff members are aware of such plan.

2. Objectives

The objective of the Business Continuity Plans (BCP) to coordinate recovery of critical business functions in managing and supporting the business recovery in the event of any disruption or disaster of the facilities (office building and other facilities). This mainly includes short 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. This also gives directions to long term disruptions in a limited sphere.

a. 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.

b. The priorities in a disaster situation are to:

1. Ensure the safety of employees and visitors in the office buildings.

2. Mitigate threats or limit the damage that threats can cause.

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.

3. Scope

The Business Continuity Plan is to recover 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 discussed in the Business Continuity Strategy of this document. This plan is separate from RHFL Disaster Recovery and Business Continuity Plan, which focuses on the recovery of technology facilities and platforms, such as critical applications, databases, servers or other required technology infrastructure being implemented by IT Department.

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.

4. Important Responsibilities

1) Maintenance of the Business Continuity Plan is the joint responsibility of the user departments to the extant they are applicable to them and the Administration Department in the Corporate Office.

2) Administration Department shall designate a senior-level official as Business Continuity Plan Coordinator (BCP Coordinator) who shall be responsible for the implementation of the plans and procedures prescribed in this document.

3) Administration Department is responsible for:

a) Periodically reviewing the adequacy and appropriateness of the Business Continuity strategy.

b) Assessing the impact on the Business Continuity Plan of additions or changes to existing business functions, procedures, equipment, and facilities requirements.

c) Updating the business recovery team personnel, taking into account promotions, transfers, and terminations.

d) Communicating all plan changes to the Business Continuity Coordinator so that the organization's Disaster Recovery and Business Continuity Plan can be updated.

4) Administration Department is also responsible for:

a) Maintaining and/or monitoring offsite office space sufficient for critical functions and to meet the facility recovery time frames.

b) Communicating changes in the Plan that would affect branches / departments in a timely manner so that they can make necessary changes in their plan.

c) Communicating all plan changes to the Business Continuity Coordinator so that the master plan can be updated.

5) The Business Continuity Coordinator is responsible for:

a) Keeping the Company's Continuity and Recovery Plan updated with changes that may be necessitated.

b) Coordinating changes among plans and communicating to management when other changes require them to update their plans.

c) Ensuring the workability of the Business Continuity Plan. This should be periodically verified by active or passive testing.

5. Scenarios of business disruption

The various processes/activities of the business can get disrupted due to any of the following situations:-

1. People viz. the staff members are not available for any reasons including epidemic outbreak

2. Premises / Office location is not available or accessible

3. Systems and / or connectivity are not available

This Plan deals with each of the critical activity of the Company, either in a branch or in any Department in Corporate Office, on the aforesaid scenarios.

6. General guidelines/instructions

These guidelines are applicable to all the branches, other offices and departments in Corporate Office.

a. The telephone numbers of the following contacts should be held in more than one location.

  i. All staff members of the concerned unit

  ii. Business Continuity Coordinator

  iii. Administration Department staff members

  iv. IT Department staff members

  v. Nearest Police Station having jurisdiction over the place

  vi. Nearest Fire Office

  vii. AMC Service Providers of all services

b. As and when any business disruption occurs, it is the responsibility of the Branch Head / Department Head to immediately contact the person responsible to provide a solution to overcome the situation for early restoration of the business process.

c. Simultaneously, the Business Continuity Coordinator and the officials of the Administration Department and/or IT Department should be informed, as the case may be.

d. The Business Continuity Coordinator shall study the situation and trigger / give permission for adopting Business Continuity Plan.

e. The progress in the restoration process should be kept informed to the Administration Department or IT Department, as the case may be and seek their guidance.

f. At the end of the event, the branch or the department in CO should inform Administration Department in detail about the event, the corrective actions taken and the time taken to restore the function who shall maintain the record of such events for review purposes.

g. The Business Continuity Coordinator shall keep the Top Management informed of the instances where there were disasters or disruptions and the action taken thereon.

h. For the purpose of BCP, each branch shall be tagged to another branch where the branch which is facing the adverse condition shall look forward to help and support. The tagging of the branches shall be done by the Regional Manager for the branches under his region. The tagged branch shall provide all the necessary support for continuation of the critical and important functions from the tagged branch premises and / or with the support of their staff. The tagged branches shall be informed about the arrangement. In the event of tagged branch is not in a position to support, the Regional Manager shall tag another branch of convenience for a limited period. The list of the tagged branches shall be maintained by the Administration department.

i. Fire Mock Drill is an important BCP function. All the staff members should be aware of the procedure to be followed in the event of fire in the premises. It is more important in Corporate Office since large number of staff members are working. Hence, the Administration Department shall conduct Fire Mock Drill in Corporate Office once in six months and for branches once in a year.

j. Administration Department shall ensure that the Fire Extinguishers are provided in all the premises including all branches and shall also ensure that they are refilled on or before the due date.

k. Administration Department shall ensure that Pest Control Measures/ Fumigation are undertaken all branches and other offices.

l. Administration Department shall ensure that the Electrical Audit in all premises including all branches are tested by professionals at frequent intervals especially in CDR and Corporate Office to identify any leakage or defects.

m. IT Department shall provide folder(s) in their central server to enable the departments in CO especially the Accounts Department to place their data. The departments and if required, the branches, may be instructed to store the data in the folder in the Central Server on a daily basis. This would act as a backup of the data which can be retrieved at any time in the event of loss of data or crash in the system.

7. Classification of activities

Each activity which is to be covered under this Plan shall be classified in respect of seriousness and the type of disruption as follows:-

1. Based on the impact, the disruption of an activity may cause, on financial, reputation, regulatory, compliance risk, etc each activity shall be classified as

a. 'Critical Activity',

b. 'Important Activity'

c. 'Other Activity'.

This would help us to prioritize the resources for early restoration and have focused attention.

'Critical Activities' are those activities that are of the highest importance for the Company and require immediate restoration without any loss of time.

'Important Activities' are those activities that may cause a reasonably serious impact on the Company's business unless remedial measures are not taken within a reasonable time.

'Other Activities' are those activities that require attention after attending to the other two activities.

2. The impact on each activity shall be studied from three perspectives, viz. non-availability of;

a. 'People',

b. 'Premises'

c. 'Systems'.

'People' shall mean the staff members of the Company.

'Premises' shall mean the office premises from where the business or activities is carried out.

'Systems' shall mean the computer hardware and software for conducting the transactions of the business.

The scenarios of the activities covered under the Plan shall be studied from non-availability of any, or combination of these perspectives and continuity plans / recover plans are described herein.

The plans described herein are indicative. Based on the specific or localized conditions, if an alternative action plan is needed which may result in better results, the same may be implemented.

8. Classification of activities

All the activities in branches and in Corporate Office which are covered under this Plan are classified as follows:

Branch Activities	
Activity	**Nature**
Opening of a branch premises	Critical

Fire	Critical
Cash transactions	Important
Business sourcing / Marketing	Others
Pending applications / log in	Others
Documentation	Others
Loan release	Important
Document safe keep	Critical
Recovery - EMI, PEMI, Critical amount, NPA amount	Important
Release of documents	Important
Hardware	Important
Service requests - ROI change / Release of security / Interest certificate/statement of account, etc.	Others
PDC / NACH Cycle Presentation	Important
Connectivity issues	Important

CO Departments Activities	
Accounts Department	
Activity	**Nature**
Interest payment on borrowings	Critical
Repayment of borrowings	Critical
Resource mobilization	Important
GST remittance	Critical
TDS remittance	Critical
Various payments including rent	Others

Salary payments	Others
Reimbursement to staff and other staff payments	Others
Collection process	Others
Loan disbursement	Important
Funds management	Important
Filing of returns	Others
Credit Department	
Processing of files logged in by branches	Others
Sanction and communication	Important
Service request - Charges / ROI / Installments / Release of security / Pre-closure	Others
Recovery Department	
SARFAESI action - Initiation / already initiated	Important
OTS - Initiation / already initiated	Important
Other recovery process	Others
Administration Department	
Fire - CO Premises	Critical
Premises maintenance	Others
Assets maintenance	Important
Record maintenance/management	Important
Insurance on assets	Important
Human Resource Department	
Recruitment	Important
Regularisation	Others
Promotions	Others

Transfers	Others
Training	Important
Resignation and relief	Important
Employee benefits	Others
Terminal benefits	Others
Internal Audit Department	
Concurrent Audit Reports	Others
Surprise Audit Reports	Others
Relieving Audit Reports	Others
Audit Committee of Board (ACB) quarterly notes	Others
Investigation Reports	Others
Internal Audit Report follow-up	Others
Branch Audit Reports	Others
Departmental Audit Reports	Others
Information Security Audit Reports	Others
Information Technology Department	
Day beginning / Day end	Critical
Branch Service request	Critical
MIS/ Report generation	Others
Updating MLR/ROI Reduction/ Interest demand	Important
Secretarial & Compliance Department	
Statutory reporting	Critical
Convening meetings	Critical
Maintenance of minutes and other records	Critical

Corporate Social Responsibility	Others
Investor Relations Department	
Resource Mobilisation	Important
Investor relationship	Critical
Business Development Department	
Loan camps and campaigns	Others
Advertisement & publicity	Others
Branch expansion	Others
Credit Review Department	
Review of credit sanctions	Others
Offsite Unit	
Loan Release Approvals/clearance	Critical
Central Depository Repository	
Fire	Critical
Maintenance of existing documents	Critical
Receipt of new documents from branches	Critical
Release / Return of documents	Important
Security aspects	Critical
Staff Accountability Examination Department	
Staff Accountability Examination in NPA accounts/ any other specific irregularities	Others
Complaints related to Staff other than HR issues	Others
Correspondence with Branches/RO, Communicating Decision/ Direction of SAE Committee	Others
Explanation letters to employees taking up of depanelment of valuers/advocates	Others
Disciplinary action files	Others
Notes to Disciplinary Committee	Others

Minutes of Disciplinary Committee meeting	Others
Quarterly review notes on Fraud to ACB and Board	Others
Annual review notes on Fraud to ACB and Board	Others
FRMC notes, Show cause notice, issue of reasoned orders	Others
FMR report	Others
Policy notes - Staff Accountability, Fraud Risk Management Policy etc.	Others
Committee of Executives notes	Others

Risk Management Department

Risk assessment, measurement and mitigation	Important

Insurance Department

Collection and payment of insurance premium	Others

Legal Department

Scrutiny and clearance of loan applications	Important

Customer Service Department

Handling Customer grievances, complaints registered with NHB Grid & Public Grievance Portal	Important
Welcome calls to new customers	Others

Planning and Process Department

Provide data to Management on the performance analysis, Peer group analysis, and Company position among peer groups in the market	Important
Introduce new products on par with current market scenario to improve the asset portfolio	Others

Operations Department

NACH updation/ run	Important

9. Item specific continuity plans

In the following paragraphs, each activity is analysed under three scenarios viz. non - availability of People, Premises and Systems. Non availability or failure in various scenarios is analysed and the continuity of business with minimal damage or loss is prescribed herein. These situations are branch specific and not universal for the Company as a whole. In respect of situations related to systems which may occur for the Company as a whole, branches may refer to Business Continuity Plan / Disasters Recovery Plan (BCP / DRP) (System Related) which is available separately.

I. Branch Activities

1. Opening of branch premises   Classification:- Critical

There may be instances when the branch/office premises could not be open in time due to;

a. Loss of keys

b. Key holder not able to reach the premises,

c. Curfew or Law and Order problems including bandh

d. Natural calamities

It is necessary for all branches and other offices including Corporate Office to keep one set of keys in a nearby branch in a sealed cover with instructions to hand over the keys to the authorized person with due acknowledgment. In the event of (a) & (b) mentioned above, efforts should be made to bring the keys as soon as possible and open the branch/office. These keys should again be deposited in the nearby branch in a sealed cover.

In respect of events mentioned in (c) & (d) above, the situation should be monitored and studied taking various factors into account including the safety and security of the staff and other assets and decision should be taken accordingly. The safety and security of the staff and other personnel shall be the prime consideration for taking the decision to open the premises. The Critical and Important activities shall be conducted through the nearby tagged branch.

2. Fire   Classification: - Critical

In the event of fire in the premises, the first priority shall be evacuation of the staff and other personnel from the premises. It shall be ensured that they are shifted to a safer place and all the personnel are available in the safe assembly point. Simultaneously, Fire Department should be contacted and give the exact location, the seriousness of the situation, etc. In the meantime, wherever possible, the assets of the Company shall be secured and shifted to safer places. However, this shall not be done exposing the staff to any sort of risk. On completion of the firefighting

exercise, a careful assessment shall be made to retrieve the assets and take steps to restore normalcy in the shortest possible time.

3. Cash Transactions   Classification: - Important

In the event of the premises not available for any reason, the customers may be requested to remit the cash in a nearby branch. In extreme cases, wherever possible, the customers may also be requested to remit directly in our bank account clearly specifying the name, account number, etc.

In the event of system not available for accounting cash, the cash may be accepted by providing a provisional receipt manually which shall be obtained back from the customer after the system generated receipt is made available. It shall be ensured that the customer is not in possession of both the receipts.

4. Business sourcing and marketing   Classification: - Others

In the event of non-availability of 'People' and/or 'Premises', these activities can be carried over to the next day or the position is restored. However, the efforts taken so far shall be documented so as to ensure continuation of these activities in a seamless manner. The potential customers shall be kept informed.

5. Pending Applications & Log in   Classification:- Others

In the event of non-availability of people, the applications shall be kept ready in all respects for uploading immediately on restoration. If the premises is not available, the activity may be kept in abeyance till the premises is available. In the event of system is not available, the activity may be kept on hold. If it is known that there may be considerable delay of more than two days to restore the systems, the pending applications may be uploaded from the nearby branch which has system connectivity in consultation with IT Dept. In all the above situations, the applicant shall be kept informed of the developments.

6. Documentation   Classification:- Others

In the event of non-availability of people, the support of the tagged branch shall be sought. Regional Office shall also provide support to the branch for completion of the documentation. The same procedure shall be followed in the event of non-availability of premises provided the situation is bound to persist for indefinite period or may exceed one day. In the event of non-availability of systems for indefinite period, the support of Tagged branch may be sought with the help of IT Department. Necessary additional documentations shall be obtained in consultation with Legal Department.

7. Loan Release   Classification:- Important

In the event of non-availability of people and / or premises, the customer may be requested to get the activity postponed for a short period. In cases where it is not possible, the support of Tagged branch may be sought and the loan release activity

may be done through such branch in consultation with IT Department and Accounts Department. The same procedure shall be followed in the event of non-availability of systems. Necessary additional documentations shall be obtained in consultation with Legal Department.

8. Document Safe Keep   Classification:- Critical

Loan documents shall be held in safe custody and sent to CDR at the earliest. Till such time, it should be ensured that they are held in fire proof cupboards duly locked. In the event of people responsible for safe keep are not available or the access to the cupboards are not available for any reason, the same should be lodged with the Tagged branch with due acknowledgement.

9. Recovery - EMI, PEMI, Critical, NPA amount   Classification:- Important

In the event of non-availability of people, the Regional Office shall depute sufficient staff for carrying out the activity. In the event of non-availability of premises and/or systems for a considerable long period, the amount recovered shall be accounted through the tagged branch on the same day in consultation with IT Department and Accounts Department.

10. Release of documents   Classification:- Important

In the event of non-availability of people and / or premises, the customer may be informed of the situation and requested to obtain the documents later. In case of indefinite period of disruption, the release of documents may be done through the tagged branch by obtaining the required documents from CDR in consultation with Legal Department.

11. Hardware   Classification:- Important

The safety and proper maintenance of hardware shall be ensured. Wherever needed, the assets should be insured. It shall be ensured that the service contracts are renewed periodically and are in force. The contact details of the maintenance and service providers are made known to all the staff members for immediate contact.

12. Service requests – ROI change / Release of security / Interest/certificate / statement of account, etc.   Classification:- Others

In the event of non-availability of people and /or premises and / or systems, the customers may be advised suitably about the approximate period by which these activities shall be carried out.

13. PDC / NACH Cycle Presentation   Classification:- Important

In the event of people and / or systems to lodge these instruments not available, it shall be done through the tagged branch. In the event of premises not available, the lodgement should take place immediately on restoration without any delay.

However in case of EMI files to be finalized for presentation in a particular cycle, the same is treated as Critical and it should be done from alternate location by same branch staff or tagged branch staff

14. Connectivity Issues   Classification:- Important

In the event of non-availability of people and / or premises and / or systems, the service providers shall be contacted for restoration as soon as possible. This activity shall be done in consultation with IT Department.

II. Corporate Office Department Activities

A. Accounts Department

General:-

The activities of the department are varied, complex and need timely action. Hence, the department shall identify the activities and assign primary responsibilities to the staff members. The department shall also create secondary and if required, tertiary team of staff members to carry out the functions, in the event of non availability of the primary team, duly informing the staff members. In the absence of any staff member, the secondary / tertiary team shall carry out the activity seamlessly.

1. Interest payment on borrowings   Classification:- Critical

The department shall have three sets of people in the form of Maker and Checker who shall be given authority to carry out the payments on the due dates. In the event of non-availability of people, the department shall specify as to who shall carry out the activity and in the absence of the primary team, which secondary team shall carry out the activity. The User id and Password shall be kept in a sealed cover and handed over to the General Manager in-charge of the department. In the event of premises and / or systems not available, efforts should be made to access the data from the Central Server from any nearby branch to initiate the payment. In spite of these efforts if the payment could not be made, a tentative payment must be considered from other sources and the information should be passed on to the lenders along with the specific reasons for the delay in making exact payment as otherwise the same may lead to Reputation Risk.

2. Repayment of borrowings   Classification:- Critical

Same procedure as in the case of S. No. 1 above shall be followed.

3. Resource mobilization   Classification:- Important

In the event of people not available, the mobilization efforts should be taken by another set of people. A back up team shall be trained for this purpose. The non-availability of premises and / or systems do not substantially hinder the process of mobilization.

4. G S T Remittance   Classification:- <u>Critical</u>

In the event of people not available, the remittance should be done by another set of people. A back up team shall be trained for this purpose. The non-availability of premises and / or systems will have impact on timely remittance. On restoration, the remittance should be made.

5. TDS Remittance   Classification:- <u>Critical</u>

In the event of people not available, the remittance should be done by another set of people. A back up team shall be trained for this purpose. The non-availability of premises and / or systems will have impact on timely remittance. On restoration, the remittance should be made.

6. Various payments including rent   Classification:- <u>Others</u>

In the event of people not available, the payments should be done by another set of people. A back up team shall be trained for this purpose. The non-availability of premises and / or systems will have impact on timely payment. On restoration, the payments should be made.

7. Salary payments   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems not available, there will be impact on payments. Immediately on restoration, the payments shall be made. In the meantime, the staff members may be informed about the situation and the likely timeframe by which the payments will be made.

8. Reimbursement to staff and other staff payments   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems not available, there will be impact on payments. Immediately on restoration, the payments shall be made. In the meantime, the staff members may be informed about the situation and the likely timeframe by which the payments will be made.

9. Collection process   Classification:- <u>Others</u>

In the event of people not available, It shall be done immediately on restoration of normalcy. If premises and / or systems are not available, the activity shall be endeavoured to be carried out through nearby branch in consultation with IT Department.

10. Loan Disbursement   Classification:- <u>Important</u>

In the event of the people who are trained in this activity are not available, the other set of people who shall be treated as fall back shall handle this activity. There is need to train two or three set of people in this activity. If all such people are not available, the borrowers may be politely informed of the situation to bear with the delay. In the event of premises and / or systems are not available, the

activity may be carried out from a nearby branch in consultation with IT Department.

11. Funds Management   Classification:- <u>Important</u>

In the event of the people who are trained in this activity are not available, the other set of people who shall be treated as fall back shall handle this activity. There is need to train two or three set of people in this activity. If all such people are not available, the utilization of funds shall be restricted to the available balance as on the previous date. In the event of premises not available and in the event of emergency requirement of funds, the people may operate from the nearest branch by retrieving the data from the Centralised Server Folder where the data to be stored on a daily basis. In the event of systems are not available, this activity shall be carried out immediately on restoration of normalcy.

12. Filing of returns   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems not available, the activity shall be carried out immediately on restoration of normalcy.

B. Credit Department

1. Processing of files logged in by branches   Classification:- <u>Others</u>

In the event of people not available, viz. the Credit Officer concerned, the work shall be equitably distributed to other Credit Officers. In the event of all the Credit Officers are not available, the activity shall be restored immediately after the situation becomes normal. In the event of premises not available, the activity may be carried out immediately after the availability of premises. If the premises is expected not to be available for a considerable long period, the activity may be carried out from nearby branch (es) / Regional Office in consultation and support of IT Department, who shall provide access to the systems and programs. In the event of systems not available for a shorter duration, the activity may be postponed till restoration. In the event of long duration failures, in exceptional cases of great importance to our business, the Regional Managers may study the physical files and make recommendations to Corporate Office to take a decision.

2. Sanction and Communication   Classification:- <u>Important</u>

In the event of people and / or premises not available, this activity may not have adverse impact since the system allows to generate sanction letter once the loan is sanctioned by the Sanctioning Authority and the sanction letter is in built in the LOS. In the event of systems are not available, the branches may be informed about the decision on the credit proposals to enable them to communicate to the customers. Immediately on restoration of the systems, the activity shall be restored to normalcy.

3. Service request – Charges / ROI / Instalments / Release of security / Pre-closure   Classification:- Others

In the event of people and / or premises and / or systems are not available, the activity shall be carried out immediately on restoration of normalcy. However, the branches shall be kept informed of the situation to enable them to keep the borrowers informed.

C. Recovery Department

1. SARFAESI action –Initiation/already initiated   Classification:- Important

In the event of people not available, the activity shall be carried out immediately on restoration. If the issue persists for a long period, the Regional Office shall undertake the activity in exceptional cases where the deadlines matter. In the event of premises and / or systems not available, the activity may be carried out from a nearby branch location in coordination with the branch concerned where the details of the account are available.

2. OTS - Initiation / already initiated   Classification:- Important

The activities shall be carried out as discussed in C.1 above

3. Other recovery process   Classification:- Others

In the event of people and / or premises and / or systems not available, the activity shall be carried out immediately on restoration.

D. Administration Department

1. Fire - CO Premises   Classification:- Critical

In the event of fire in the premises, all the resources shall be diverted to deal with the situation. The Fire Department shall be informed. It shall be ensured that all the employees and other personnel in the premises shall be evacuated through safe means and immediately head count shall be carried out to ensure all the personnel have reached the Safe Assemble Point of the building. It shall be ensured that appropriate Fire Extinguishers are utilized to douse the fire till the Fire Department personnel arrive. If any person is injured, they should be taken to the nearby hospital. On dousing the fire, none of the staff members shall be allowed to enter the premises until it is declared by Fire Department that it is safe to enter.

In order to be in alert situation, Fire Drills shall be carried out by the Department at prescribed intervals in order to familiarize the staff on evacuation procedure. It shall be ensured that the latest fire extinguishers gadgets are installed in the premises and the staff members are familiarized with the operation of such gadgets. It shall also be ensured that the fire extinguishers are refilled within the due dates.

2. Premises Maintenance   Classification:- <u>Others</u>

As this activity is outsourced, it shall be ensured that the agency to whom the activity is outsourced is having sufficient resources and expertise to handle such situations smoothly.

3. Asset Maintenance   Classification:- <u>Important</u>

Most of the assets are maintained by outsourced agencies or through Annual Maintenance contracts. It shall be ensured that all assets are covered under Maintenance Contracts with reputed agencies and the contracts are renewed in time.

4. Records Maintenance & Management   Classification:- <u>Important</u>

The records shall be maintained neatly and orderly manner. The old records shall be destroyed as per the extant Policy. It shall be ensured that pest and rodent control measures are taken. The storages shall be labelled for easy retrieval by any one even in the absence of the relevant persons.

5. Insurance on assets   Classification:- <u>Important</u>

In order to overcome the situation of non-availability of people and / premises and / or systems, the insurance on the assets including motor vehicles shall be made sufficiently in advance.

E. HRD Department

1. Recruitment   Classification:- <u>Important</u>

In the event of the key people not available, the process shall be carried out by other set of people who shall be earmarked and kept informed of the process especially where the test / and / or interview process is already fixed. If the premises is not available, the process shall be conducted from an alternate place. For this purpose, an alternate place shall be planned which may be another office / branch of the Company. Non availability of systems may not have greater impact in this process.

2. Regularisation   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems are not available, the activity may be undertaken immediately after restoration of the situation.

3. Promotions   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems are not available, the activity may be undertaken immediately after restoration of the situation.

4. Transfers   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems are not available, the activity may be undertaken immediately after restoration of the situation.

5. Training   Classification:- <u>Important</u>

The department shall maintain a list of faculty for each subject. There shall be more than one person for each subject in the list. In the event of people who are assigned with handling session(s) not available, the other person from the list shall be requested to handle the session. The schedule of the program may also be modified to suit the convenience of the faculty's availability. In the event of premises not available, an alternate premises may be planned. The non-availability of systems may not have much impact. However, the faculty may be advised to carry the hard copy of their presentations / displays which can be used in the event of requirement.

6. Resignation & Relief   Classification:-<u>Important</u>

In the event of the key people not available, the process shall be carried out by other set of people who shall be earmarked and kept informed of the process. The employee may be requested to postpone his / her relief for a short period. It not possible, a conditional relief may be given in consultation with Legal Department. The same process may be adopted in the event of premises and / or systems are not available.

7. Employee Benefits   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems are not available, the activity may be undertaken immediately after restoration of the situation.

8. Terminal Benefits   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems are not available, the activity may be undertaken immediately after restoration of the situation.

F. Internal Audit Department

1. Concurrent Audit Reports   Classification:- <u>Others</u>

Branch with loan outstanding of over 100 Crs and NPA over 100 Crs and classified as Concurrent branch and internal audit for the classified branch are conducted on monthly basis. In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

2. Surprise Audit Reports   Classification:- <u>Others</u>

Surprise audit is conducted on random basis on Concurrent branch for previously audited periods. In the event of people and/or premises and/or systems not

available, the activity may be undertaken immediately on restoration.

3. Relieving Audit Reports   Classification:- Others

Internal audit is conducted upon the branch in the event of resignation of the present branch head for his period of charge at that branch. In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

4. Audit Committee of Board (ACB) quarterly notes   Classification:- Others

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

5. Investigations Reports   Classification:- Others

Investigation is conducted on a branch or Personal based on the valid complaints received and under the discretion of competent authority. In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

6. Internal Audit Report Follow-up   Classification:- Others

Compliance for the Reports sent to the branch is followed by the back end internal audit team at corporate office till the closure of the said report. In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

7. Branch Audit Reports   Classification:- Others

Branch audits are conducted on regular internal based on the previous rating and the reports are submitted to the Internal audit department for review. After review and approval by HIA the report is communicated to branch for further compliance. In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

8. Departmental Audit Reports   Classification:- Others

Internal audit of Departments functioning at the head office and various regional offices across PAN-INDIA. In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

9. Information Security Audit Reports   Classification:- Others

Information security audit is conducted to find out the potential weakness in the organisations security systems, including software, hardware, network and data protection measures. Currently, external auditors hired by the company conduct this. In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

G. IT Department

The Business Continuity Plan for IT Department is largely covered under DR and BCP of the department covering IT system related activities. In this document, the activities which are not covered under the aforesaid Plan and which are related to the activities in Corporate Office are discussed.

1. Day Begin & Day End   Classification:- Critical

The Department shall have atleast three sets of people who are familiar with the activity. In the event of people not available, the activity shall be undertaken by another set of people. In the event of primary set of people not able to carry out the function, the information shall be provided to the senior official designated for this purpose and also to the Head of the Department sufficiently in advance to enable them to arrange for deputing the other set of people. If one of them is not available, another person identified for this purpose may undertake the activity. In the event of premises and / or systems not available, the activity may be undertaken from the DR site.

2. Branch Service Requests   Classification:- Critical

The Department shall ensure adequate staffing through appropriate training to efficiently manage service requests. In situations where designated personnel are not available, alternate qualified staff shall be assigned to perform the required tasks. If access to our Corporate Office or any of our branches or Desktops is not feasible, the required work may be carried out from a nearby branch location, either with the existing branch Desktop or with a Laptop.

3. MIS / Report Generation   Classification:- Others

In the event of people and / or premises and / or systems not available, the activity may be undertaken immediately after restoration. In the event of any report required immediately on an urgent basis, the same may be generated from DR site.

4.Updating MLR/ROI Reduction/Interest Demand   Classification:- Important

In the event of people and / or premises and / or systems not available, the activity may be undertaken immediately on restoration. However, in the event of prolonged disruption, the same may be carried out from the DR site.

H. Secretarial & Compliance Department

1. Statutory Reporting   Classification:- Critical

Sufficient number of people shall be trained in making the reports. In the event of people not available, the activity shall be carried out by other people who are trained in this activity. In the event of premises and / systems not available, the activity of critical reporting may be undertaken from a nearby branch premises.

The other reporting which can be postponed may be undertaken immediately after restoration of normalcy.

2. Convening meetings   Classification:- <u>Critical</u>

In the event of people who coordinate conducting the meetings not available, the same may be conducted with the assistance of other person who has sufficient knowledge about the activity. In the event of premises not available, the meeting may be held in an alternate location including hotels. Even if systems are not available, the meetings may be conducted as they are predominantly physical activity.

3. Maintenance of minutes and other records   Classification:- <u>Critical</u>

The department may train more than one person in this activity. In the event of people not available, the other person trained shall carry out this activity. The non-availability of premises and / systems may not have much impact since they can be undertaken as soon as the normalcy is restored.

4. Corporate Social Responsibilities   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems not available, the activity may be undertaken immediately on restoration.

I. Investors Relations Department

1. Resource Mobilisation   Classification:- <u>Important</u>

It shall be ensured that more than one person is involved in this activity jointly to enable continuance of the activity in the event of absence of relevant person. The non-availability of premises and / or systems shall not have significant adverse impact on the activity.

2. Investor Relations   Classification:- <u>Critical</u>

As this activity is very important, more than one person in Senior Management shall be involved in the activity to enable maintenance of relationship and communication with the investors. The non-availability of premises and / or systems shall not have significant adverse impact on the activity.

J. Business Development Department

1. Loan Camps and Campaigns   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems not available, the activity may be undertaken immediately on restoration.

2. Advertisement & Publicity   Classification:- <u>Others</u>

In the event of people and / or premises and / or systems not available, the

activity may be undertaken immediately on restoration.

3. Branch Expansion   Classification:- Others

In the event of people and / or premises and / or systems not available, the activity may be undertaken immediately on restoration.

K. Credit Review Department

1. Review of Credit Sanctions   Classification:- Others

In the event of premises and / or systems not available, the activity may be undertaken immediately on restoration.

In the event of people not available, work will be carried out by the immediate sub-ordinate for the smooth functioning of day-to-day activities.

L. Offsite Unit

1. Loan Release approvals and Clearance   Classification:- Critical

In the event of people not available, the services of the Inspection Officers may be sought. HRD Dept may also depute officers from Corporate Office on emergent basis. In the event of premises and / or systems not available, the activity may be undertaken from another location / CO in consultation with IT Dept.

M. Central Documents Repository (CDR)

1. Fire   Classification:- Critical

In the event of fire in the premises, all the resources shall be diverted to deal with the situation. The Fire Department shall be informed. It shall be ensured that all the employees and other personnel in the premises shall be evacuated through safe means and immediately head count shall be carried out to ensure all the personnel have reached the Safe Assemble Point of the building. It shall be ensured that appropriate Fire Extinguishers are utilized to douse the fire till the Fire Department personnel arrive. If any person is injured, they should be taken to the nearby hospital. On dousing the fire, none of the staff members shall be allowed to enter the premises until it is declared by Fire Department that it is safe to enter.

In order to be in alert situation, Fire Drills shall be carried out by the Department at prescribed intervals in order to familiarize the staff on evacuation procedure.

It shall be ensured that the latest fire extinguishers gadgets are installed in the premises and the staff members are familiarized with the operation of such gadgets. It shall also be ensured that the fire extinguishers are refilled within the due dates.

2. Maintenance of Existing Documents   Classification:- <u>Critical</u>

In the event of people not available, the activity shall be carried out by different set of people. The duplicate keys shall be lodged in a sealed cover in a different location of convenience. The alternate people shall obtain the duplicate keys with the approval of Corporate Office and operate the activity. In the event of premises not available, there shall not be much impact. On restoration, it shall be ensured that the existing documents are available. The non-availability of systems shall not have impact on this activity.

3. Receipt of new documents from branches   Classification:- <u>Critical</u>

In the event of people not available, the activity shall be carried out by different set of people who shall receive the documents, record the same and keep it in safe custody. On restoration, the same shall be handed over to the people concerned against acknowledgement. In the event of premises not available, the documents received through post / courier shall be arranged to be received from the service provider location and record the same and keep it in safe custody. On restoration, the same shall be accounted and taken for safe keep. In the event of systems not available, the recordings shall be made manually and shall be updated when normalcy is restored.

4. Release / Return of documents   Classification:- <u>Important</u>

In the event of people not available, the activity may be postponed till normalcy is restored. However, the disruption is prolonged; the other set of people shall obtain the duplicate keys and carry out the activity. Proper recordings shall be made of return or release of documents. In the event of premises is not available, the activity shall be carried out immediately after the normalcy is restored. In the event of systems not available, the release / return shall be recorded manually and updated in the system immediately on restoration.

5. Security Aspects   Classification:- <u>Critical</u>

CDR holds document to title of properties worth crores of rupees. Hence, it is essential the all security aspects are introduced and in place without any interruption. The documents shall be secured from fire, floods, termite, pilferage, destruction, etc. Adequate fire extinguishers shall be installed and ensured that they are refilled within the due dates. Termite treatment shall be carried out at frequent intervals. The accesses to the records are restricted to authorized persons alone duly recording the activity. CCTV cameras are installed to cover every place where the documents are stored and ensured that the cameras are in working condition. Recordings of CCTV are properly backed up and available for at least 6 months. In the event of people not available, Corporate Office shall depute necessary officials to ensure security of the assets. In the event of premises not available, it shall be ensured that entries by unauthorized persons do not occur. On restoration, it shall be ensured that all the assets are intact. In the event of systems not available, no impact is anticipated.

N. Staff Accountability Department

1. Staff Accountability Examination in NPA accounts/any other specific irregularities   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

2. Complaints related to Staff other than HR issues   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

3. Correspondence with Branches/RO, Communicating Decision/ Direction of SAE Committee   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

4. Explanation letters to employees taking up of depanelment of valuers/advocates
                                                             Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

5. Disciplinary action files   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

6. Notes to Disciplinary Committee   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

7. Minutes of Disciplinary Committee meeting   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

8. Quarterly review notes on Fraud to ACB and Board   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

9. Annual review notes on Fraud to ACB and Board   Classification:- Others

   In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

10. FRMC notes, Show cause notice, issue of reasoned orders   Classification:- Others

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

11. FRM report   Classification:- Others

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

12. Policy notes - Staff Accountability, Fraud Risk Management Policy etc

Classification:- Others

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

13. Committee of Executives notes   Classification:- Others

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

O. Risk Management Department

1. Risk assessment, measurement & mitigation   Classification:- Important

In the event of people and/or premises and / or systems not available, the activity may be undertaken immediately on restoration.

P. Insurance Department

1. Collection and payment of insurance premium   Classification:- Others

In the event of people and / or premises and / or systems not available, the activity may be undertaken immediately on restoration.

Q. Legal Department

1. Scrutiny and clearance of loan applications   Classification:-Important

In the event of people and / or premises and / or systems not available, the activity may be undertaken based on the Plan provided for Credit Department.

R. Customer Service Department

1. Handling of Customer Grievance   Classification:- Important

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

2. <u>Welcome calls to New Customers</u>   Classification:- <u>Others</u>

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

S. Planning and Process Department

1. <u>Provide data to Management</u>   Classification:- <u>Important</u>

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

2. <u>Introduction of New Products</u>   Classification:- <u>Others</u>

In the event of people and/or premises and/or systems not available, the activity may be undertaken immediately on restoration.

T. Operations Department

1. <u>NACH updation / Run</u>   Classification:- <u>Important</u>

In the event of people and / or premises and / or systems not available, the activity may be undertaken immediately on restoration. However, in the event of prolonged disruption, the same may be carried out from the DR site.

10. Conclusion

This Plan shall be reviewed periodically but at least once in a year based on the incidents that happened and other factors and placed to Board for review. In the meantime, the Managing Director & Chief Executive Officer is authorized to make required changes to the Plan based on circumstances and situations which shall be updated in the ensuing review of the Plan.