

Crisis Management Plan

Owner: Chief Executive Officer

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PURPOSE

The purpose of this plan is to provide the Company, its business units and subsidiaries with a framework to manage an event or situation which threatens the safety or security of staff; pose a threat to or result in a significant impact to the continuity of the business; seriously affect the reputation of the Company; or adversely affect the share price which will be managed centrally by the Crisis Management Committee.

REVIEW

This document will be reviewed annually by the Business Continuity Manager, or after material change (e.g. company restructure).

The Business Continuity Manager is responsible for keeping the information up to date.

INTERNAL DOCUMENT

No confidential information is contained in this document. However, it should be retained securely when kept off-site and should not be passed to anyone external to the company without the permission of the owner or author.

DISTRIBUTION

Gold Team Members and Deputies
Silver Team Members and Deputies (for information)
Silver Team Battle boxes

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1. POLICY STATEMENT

- 1.1 The Company Partnership, its business units and subsidiaries will have procedures in place to manage crises in line with the requirements of this policy.
- 1.2 Events or situations which threaten the safety or security of staff; pose a threat to or result in a significant impact to the continuity of the business; seriously affect the reputation of the Company; or reduce the share price by more (or about) 30% will be deemed to be crises and will be managed centrally by the Company Crisis Management Committee.
- 1.3 Business unit managers will report crises to the Head Office without any unnecessary delay.

Examples of incidents which are to be reported to the Head Office include:

- Extortion or attempted extortion where threats to life or assets are concerned. This includes kidnap or hostage incidents, unlawful detention, threats against people property or reputation, bomb threats or threats (which include attempted extortion) to infect computers or networks with a virus.

Other reportable incidents are:

- Serious natural disaster or accident.
- Sudden unexpected death of key personnel.
- Serious disruptive labour conflict.
- Serious high-level scandal.
- Serious fraud or computer crime.
- Computer or network failure affecting more than one business unit.
- War, revolution.
- Serious violent crime.
- Epidemic disease.

Or

- Any other incident or situation which has a significant effect on business continuity, the reputation of the Company or which might adversely affect the share price.

- 1.4 All communications concerning a crisis, whether to the media or internal, will be approved by the Company Crisis Committee prior to release.
- 1.5 Company and business unit Crisis Plans will be maintained and exercised at least annually.

2. PURPOSE

- 2.1 The purpose of the Company Crisis Management Policy is to establish a framework at the Company and business unit level, through which the Company, its business units and subsidiaries will seek to avoid impending crisis situations and continue operations, while providing a systematic, organised and managed response in order to return to normal conditions as soon as possible.

3. SCOPE

- 3.1 This policy applies to all parts and all activities of the Company, its business units and subsidiaries.

4. UNDERLYING PHILOSOPHY

- 4.1 The Company has a responsibility to its employees and shareholders to ensure that it responds to and manages crisis incidents in such a way as to safeguard employees and assets, limit damage to the Companies reputation or share value and prevent disruption to the conduct of normal day-to-day business.
- 4.2 The strategic and tactical management of crisis situations is best directed from outside the local line management structure of a business unit, to allow local management to continue to concentrate on running the business, to provide specialist expertise and to ensure there is a Company response to serious situations.
- 4.3 To respond effectively to crisis it is necessary to have a well understood crisis management structure, high level pre-prepared agreed principles and rapid access to decision-making authority.
- 4.4 Preparation and planning mitigates the adverse effects of crisis incidents on both

personnel and the business.

- 4.5 Making available pre-designated and specialist resources to manage crisis incidents will minimise disruption to the business unit and the Company.
- 4.6 Managing the release of information to the media is critical to the outcome or perception of the outcome of any crisis.

5. CORPORATE OBJECTIVES

- 5.1 To protect staff, assets and reputation by establishing a crisis framework within which the Company, its business units and subsidiaries will operate in a crisis situation.
- 5.2 To establish a structure with clear responsibilities assigned in advance, so that the company can manage extraordinary events rationally.
- 5.3 To establish agreed principles which will direct the actions of the Company Crisis Committee and business unit management in crisis situations.
- 5.4 To avoid crisis situations where practicable and where they occur, to stabilise the incidents quickly and bring them to a controlled conclusion.
- 5.5 To demonstrate that the Company acts in a responsible manner.
- 5.6 To manage the release of information internally and to the media, to prevent inaccuracy in its content and to prevent damage to the reputation of the Company.

6. CORPORATE PRINCIPLES AND PRACTICE

- 6.1 Events that threaten staff, assets or the reputation of the Company, its business units and subsidiaries will be reported without unnecessary delay to the Company Crisis Committee.
- 6.2 The Company will manage crises through the Company Crisis Management Committee, which is based in the Head Office.
- 6.3 All statements concerning a crisis released internally or to the media, will be approved by the Company Crisis Committee prior to release.
- 6.4 All business units will have an established Incident Management Team, which will be responsible to the business unit head for crisis preparation and local management.
- 6.5 Incident Management Team preparation and Crisis Plans will be exercised at least annually.

Best Practice

Reportable (Crisis) Incidents

Crisis plans are intended to be used to manage only the most serious incidents - specifically, ones which would have a significant impact on the continuity of the business, seriously affect the reputation of the Company or adversely affect the share price. (Examples are given in the policy statement at the beginning of this document.)

Examples of incidents that need *not* be reported to the Company Crisis Co-ordinator include:

- Computer crash.
- Computer virus infection without extortion.
- Infringement of rules and regulations.
- 'Normal' fraud and crime.
- 'Normal' computer crime.

but should be reported through normal reporting channels where appropriate.

Implementation

All business unit heads will be briefed of the existence of the crisis management arrangements. Each divisional unit director is accountable to Central Support Office for

preparing the organisation for the eventuality of crisis situations within their area of responsibility and for preventing a potential crisis wherever possible.

Crisis Management Structure

The Company Executive Committee

The Company Executive Committee is the ultimate decision-making authority and as such will ratify crisis policy and strategy. During a crisis incident it will act as the ultimate authority, provide strategic guidance where necessary and review decisions. Following the incident the Executive Committee will review the management of the incident.

The Company Crisis Management Committee

The Company Crisis Management Committee (CCMC) is chaired by the Chief Executive Officer and is responsible for the preparation of Crisis Plans. During an incident, the CCMC will provide strategic management of the incident, decide the tactics to be used by the divisional business units and review the actions of the divisional business unit. Following the completion of the incident the CCMC will prepare a full report for review by the Executive Committee.

The Company Crisis Co-ordinator

The Company Crisis Co-ordinator is the Operations & IT Director. The role of the Crisis Co-ordinator is to relieve the CCMC of much of the work involved in developing policy and guidelines, managing incidents and allowing the business to continue relatively normally. Principally the co-ordinator will be the focus for information, will keep a diary of events and decisions, maintain the link to the local Incident Management Team, submit papers and briefs to the CCMC and Executive Committee and act as third party liaison.

The Company Crisis Co-ordinator will ensure that all heads of business unit are briefed fully on Company Crisis arrangements and on their responsibilities concerning Crisis Management.

The Incident Management Team.

The local Incident Management Team (IMT) will be convened by local management and the CCMC when appropriate. The IMT will be chaired by a local senior manager nominated by the Divisional Head and agreed with the CCMC. The IMT are responsible for managing locally the incident within the bounds set by the CCMC, advising the CCMC on local strategy and tactics and continuously reporting to the Crisis Co-ordinator.

Directors of Divisional Business Units.

Each divisional business unit director is responsible for preparing their organisation for crisis situations, and for preventing potential crises wherever possible. They will acquaint themselves with this document, brief their unit on which incidents must be reported and the mechanisms to do so, develop local plans where necessary and ensure that the Company Crisis Co-ordinator is contacted when required.

Contact Details and Initial Actions

In the event of a crisis situation the initial action is critical to the successful handling of the crisis. Early identification of a potential crisis is essential in containing the situation. It is vital that the Company Crisis Management Committee is alerted promptly in order that an Incident Management Team can be formed rapidly.

When a crisis situation occurs, or is impending, the following information must be passed by telephone to:

the **Company Crisis Co-ordinator on tel:**

Giving the following: -

- Full names of persons involved (including nationality)
- Date and time of incident.
- Business unit name.
- Location of incident.
- Brief description of incident.
- Involvement of local authorities.
- Involvement of the media.
- The name of the person reporting the incident, staff reference number (if applicable) and all possible contact details - a telephone number must be the minimum.
- The person reporting the situation must ensure that they make it clear that this is an emergency and ask that the Company Crisis Co-ordinator be contacted. .

Immediate follow up actions.

- Start a diary of events.
- Designate a telephone to be used for contact with the CCMC.

- Brief other likely recipients of telephone calls, to refer all calls to the designated telephone.
- Brief the local police at the highest possible level. (If appropriate).
- Avoid making any comment to the media. Prepare the text of a statement for the press, but do not release it until it has been agreed by the CCMC. Refer ALL enquiries to a nominated media spokesman.
- If appropriate discreetly review the security of senior employees.
- Identify sources of press statements in local government agencies and consider ways of attempting to limit comment.
- Select suitable IMT members and prepare to submit their names to the CCMC for ratification. Precise terms of reference for the IMT will be agreed by the CCMC. Guidelines for probable IMT responsibilities are contained in this paper.
- If appropriate select a suitable negotiator/communicator and submit the name to the CCMC for ratification. When this is received confirm that they are willing to negotiate on behalf of the company.

Once contact with the CCMC is established, ALL subsequent local action must be specifically authorised by the CCMC.

All action taken locally and all incidents relating to the extortion must be reported to the CCMC at the earliest opportunity.

7. RESPONSIBILITIES

- 7.1 The Operations & IT Director is responsible for developing and maintaining this policy; for ensuring it is implemented and for facilitating the exchange of best practice throughout the Company.
- 7.2 The Chief Executive Officer is responsible for the Company Crisis structure and for chairing the Company Crisis Committee.
- 7.3 Company Directors and business unit heads are responsible for implementing this policy throughout the area for which they are responsible and for ensuring that all employees know of its existence and requirements.
- 7.4 Directors and business unit heads are responsible for preparing their organisation for crisis situations. A local Incident Management Team (IMT) will be established in each business unit to prepare for Crisis and Business Continuity incidents and to prevent potential crises wherever possible.

Directors & business unit heads will acquaint themselves with this document, brief their

unit on which incidents must be reported and the mechanisms to do so develop local plans and ensure that the Company Crisis Co-ordinator is contacted when required.

7.5 All staff are responsible for acquainting themselves with this policy and its requirements.

Policy owner:

Contact details: