ANJANEY STOCK BROKING LIMITED

MEMBER: NSE, BSE

DP: NSDL

SEBI SINGLE REG NO. INZ000263532

DP SEBI REG NO. IN-DP-303-2016

TM ID : NSE-12417; BSE-6224

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BCP AND RESPONSE MANAGEMENT POLICY

Policy created by	**Mr. Pramod Kumar Sanganeria**
Policy reviewed by	**Technology Committee**
Policy reviewed on	**30-12-2023**
Policy Approved by	**Board of Directors**
Policy approved on	**05-01-2024**

VERSION - 2.0

[30 DECEMBER 2023]

Purpose

The purpose of this Business Continuity Planning (BCP) and Response Management Policy is to establish guidelines and procedures to ensure the continuity of critical business operations, mitigate the impact of disruptions, and provide a structured response to emergencies or unforeseen events at our Company.

Scope

This policy applies to all employees, contractors, and third-party vendors who have responsibilities related to the business continuity and response management efforts of the stock brokerage firm.

Policy Guidelines

Risk Assessment and Business Impact Analysis (BIA)

- Regular risk assessments and BIAs will be conducted to identify potential threats and assess their impact on critical business functions.
- Findings from risk assessments and BIAs will inform the development and updating of the BCP.

Business Continuity Planning (BCP) Framework

- A comprehensive BCP framework will be established to guide the development, implementation, and maintenance of business continuity plans.
- BCPs will address various scenarios, including but not limited to technology failures, natural disasters, and pandemics.

Emergency Response Plan

- An Emergency Response Plan will be developed to provide clear guidelines for immediate response to emergencies.
- Roles and responsibilities during emergencies will be clearly defined.

Communication Protocols

- Effective communication protocols will be established to ensure timely and accurate dissemination of information during emergencies.
- Communication channels will be diverse to accommodate various scenarios.

Employee Training and Awareness

- Employees will receive regular training on their roles and responsibilities during emergencies.
- Awareness campaigns will be conducted to ensure all employees are familiar with the BCP and Emergency Response Plan.

Alternative Work Arrangements

- Plans for alternative work arrangements, such as remote work, will be in place to ensure continuity in the event of office unavailability.
- Technology infrastructure will be equipped to support remote work.

Data and System Backup

- Data backup and system recovery procedures will be established to ensure the availability of critical systems and data during disruptions.

- Regular testing of backup and recovery processes will be conducted.

Testing and Exercises

- Regular testing and simulation exercises will be conducted to assess the effectiveness of the BCP and response plans.
- Findings from exercises will inform updates and improvements to the plans.

Coordination with External Partners

- Coordination with external partners, such as regulators and key vendors, will be established to ensure a collaborative and effective response during emergencies.

Compliance and Legal Considerations

Regulatory Compliance

- The BCP and response management efforts will comply with relevant financial regulations and industry standards.
- Periodic audits will be conducted to verify compliance.

Review and Update

- This policy will be reviewed regularly and updated as necessary to address emerging risks, technological advancements, and regulatory changes.

Employee Responsibilities

- Employees are responsible for familiarizing themselves with the BCP and Emergency Response Plan and following guidelines during emergencies.
- Reporting incidents promptly is crucial to effective response and recovery efforts.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff/Employees/and Directors of the Company.

For M/s. ANJANEY STOCK BROKING LIMITED

Mr. Pramod Kumar Sanganeria

(Designated Officer)

Date: 05-01-2024