NODE4

Business Continuity Policy

12/03/2025 Node4 Limited PUBLIC

Proprietary Notice
Information contained in the document is accurate to the best of Node4's knowledge at the time of publication and is required to be treated as confidential at all times. Information presented herein may not be used, copied, disclosed, reproduced, or transferred to any other document by the recipient, in whole or in part, without the prior written authorisation from a Node4 authorised representative.

Version	Status	Date	Author	Reviewer	Changes
0.1	Draft	20/05/2024	Eddie Adams	Kate Lincoln	Initial draft
1.0	Approved	24/05/2024	Eddie Adams	Kate Lincoln	Final review
1.1	Approved	12/03/2025	Eddie Adams	Kate Lincoln	Scoped updated in line with recertification

Contents

Purpose 3

- Commitment 3

Objectives 3

Scope 4

Business Continuity Management System (BCMS) 4

- Business Impact Analysis (BIA) 5
- Risk Assessment 6
- Disaster Recovery Plans (DRP) 6
- Incident Response 7
- Testing and Exercising 7
- Management Review 7

Roles and Responsibilities 8

Training & Communication 8

Related Documents 8

Purpose

This Business Continuity Policy sets out the framework for Node4 to manage and respond to disruptive incidents and ensure the continuity of critical business operations. In line with Node4's certification, this policy aligns with the ISO 22301 standard for Business Continuity Management Systems (BCMS).

Commitment

Node4 Management demonstrate leadership and commitment to the Business Continuity Management System by:

- Ensuring that policies and objectives are established for the BCMS.
  - Identify and prioritise the continuity of Node4's critical services using a robust and consistent Business Impact Analysis (BIA) process.
  - Using a risk-based approach, develop effective contingency strategies for critical services (as determined by the BIA process).
  - Establish effective incident management procedures for use during a disruption.
  - Develop BC plans that are fit for purpose, regularly reviewed, available and simple to follow and understand.
- Managing a comprehensive, risk-based BCMS informed by the requirements set out in ISO 22301.
- Delivering to, and maintaining, ISO 22301 certification.
- Ensuring the integration of the BCMS requirements into business processes.
- Ensuring that the resources needed for the BCMS are available.
- Communicating the importance of effective business continuity management and conforming to the BCMS requirements.
- Ensuring that the BCMS achieves its intended outcome(s) and satisfies applicable internal and external requirements.
- Directing and supporting persons to contribute to the effectiveness of the BCMS.
- Continually improve Node4's BCMS through regular evaluation of its efficacy and appropriateness considering any changes to legal and regulatory requirements.
- Ensuring business continuity procedures are exercised and tested routinely to ensure that they are consistent with our business continuity objectives.
- Deliver a programme of training and exercising, developed against required competencies and delivered to all staff with a direct BC responsibility.
- Undertaking a routine management review to review the BCSMS to ensure its continuity suitability, adequacy and effectiveness.

Objectives

Nod4's Business Continuity policy is in place to help us prepare for potential threats and maintain essential services even during unexpected events. Our core objectives are to:

- **Safeguard Critical Business Processes**: Identify and prioritise critical functions to ensure continuity during disruptions.

- **Minimize Downtime and Losses**: Develop strategies to reduce the impact of disruptions and facilitate timely recovery of operations.

Scope

Node4's Business Continuity Management System (BCMS) covering the provision of public, private and hybrid cloud solutions, network infrastructure and connectivity solutions, cyber security services, data management solutions, and IT Managed Services.

All Node4 owned sites are included in this scope, namely:

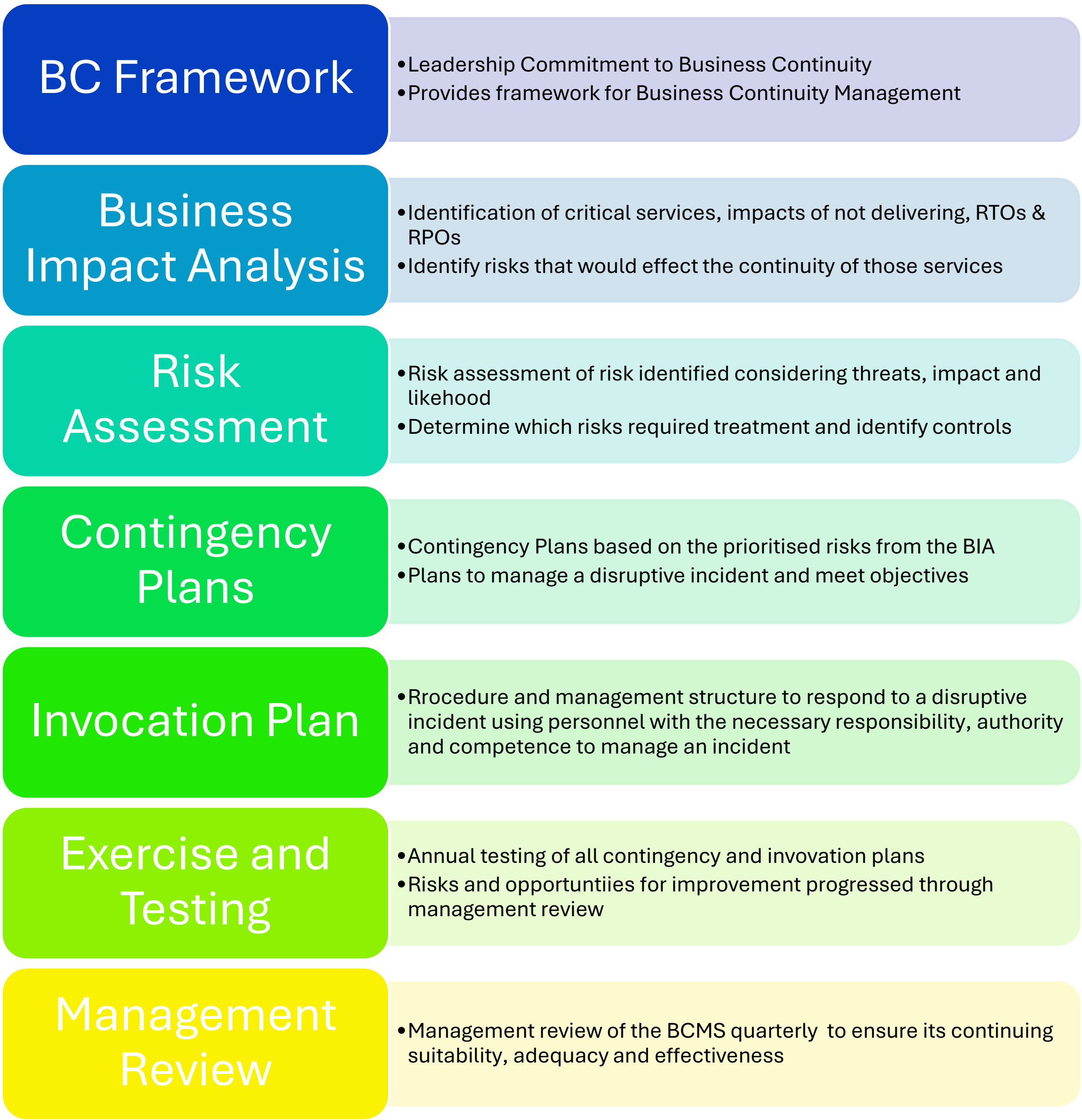
- DC1, Derby.
- DC2, Derby.
- DC3, Wakefield.
- DC4, Northampton.

Business Continuity Management System (BCMS)

Node4 establish, implement, maintain, and continually improve a BCMS in accordance with the requirements of ISO 22301.

The Plan-Do-Check-Act (PDCA) model is applied to the planning, establishing, implementing, operating, monitoring, reviewing, maintaining and continually improving the effectiveness Node4's BCMS.

Plan – Establishing business continuity policy, objectives, targets, controls, processes and procedures relevant to improving business continuity in order to deliver results that align with Node4's objectives.
Do - Implementing and operating the business continuity policy, controls, processes and procedures.
Check – Monitor and review performance against business continuity policy and objectives, reporting the results to management for review, and determining and authorizing actions for remediation and improvement.
Act – Maintaining and improving the BCMS by taking corrective action, based on the results of management review and reappraising the scope of the BCMS and business continuity policy and objectives.



BC Framework
- Leadership Commitment to Business Continuity
- Provides framework for Business Continuity Management

Business Impact Analysis
- Identification of critical services, impacts of not delivering, RTOs & RPOs
- Identify risks that would effect the continuity of those services

Risk Assessment
- Risk assessment of risk identified considering threats, impact and likehood
- Determine which risks required treatment and identify controls

Contingency Plans
- Contingency Plans based on the prioritised risks from the BIA
- Plans to manage a disruptive incident and meet objectives

Invocation Plan
- Rrocedure and management structure to respond to a disruptive incident using personnel with the necessary responsibility, authority and competence to manage an incident

Exercise and Testing
- Annual testing of all contingency and inovation plans
- Risks and opportuntiies for improvement progressed through management review

Management Review
- Management review of the BCMS quarterly to ensure its continuing suitability, adequacy and effectiveness

Business Impact Analysis (BIA)

Node4 conduct a BIA to identify critical business functions and the resources supporting them in order to determine continuity and recovery priorities, objectives and targets. The BIA includes assessing the impacts of disrupting activities that support the organization’s products and services.

A review of the BIA will be undertaken annually or when a change occurs to ensure that Node4’s BCMS remains up to date. This assessment will be undertaken by the Quality & Compliance team will the relevant management team members.

The BIA will include the following:

- Identifying activities that support the provision of products and services;
- Assessing the impacts over time of not performing these activities;

- Setting prioritized timeframes for resuming these activities at a specified minimum acceptable level, taking into consideration the time within which the impacts of not resuming them would become unacceptable;
- Identifying risks that could affect the continuity of the products and services, informing the risk assessment process.

Risk Assessment

Based on the risks identified in the BIA, an assessment will be undertaken to analyse and evaluate the risk of disruptive incidents to the organization.

The risk assessment will:

- Identify risks of disruption to Node4's activities and the processes, systems, information, people, assets and suppliers that support them;
- Systematically analyse risk considering the threats, impact and likelihood;
- Determine which disruption related risks require treatment;
- Identify treatments in line with business continuity objectives.

Risks will be documented and assessed through Node4's Risk Management Procedure.

Disaster Recovery Plans (DRP)

Based on the results of the BIA and risk assessment, Node4 develop Disaster Recovery Plans to ensure the continuity of critical business functions during a disruption.

These plans are in place to manage a disruptive incident and continue our activities based on recovery objectives identified in the business impact analysis.

DRPs will be documented and subject to annual testing and exercising.

The plans include:

- **Purpose and Scope** – the purpose of the plan and its scope, including which parts of the organization it covers.
- **Objectives** – outlines the objectives of the disaster recovery plan, such as the recovery time objectives (RTOs) and recovery point objectives (RPOs) for critical activities.
- **Roles and Responsibilities** – defines the roles and responsibilities of individuals or teams during a disaster recovery situation.
- **Resource Requirements** – detail of the resources required (people, technical, financial etc.) in order to meet the objectives.
- **Activation and Deactivation Procedures** – describes when and how the disaster recovery plan should be activated and deactivated.
- **Incident Response** – outlines the steps to be taken immediately after a disaster has been declared, including safety procedures and communication plans.
- **Recovery Procedures** – the steps to be taken to recover each of the organization's critical activities within the defined RTOs and RPOs.
- **Restoration Procedures** – the steps to be taken to restore normal operations once the immediate disaster situation has been resolved.

- **Training and Testing** – the training to be provided to personnel and the testing to be carried out to ensure the disaster recovery plan is effective and up to date.
- **Appendices** – may include contact lists, equipment lists, floor plans, checklists, and any other information that supports the disaster recovery plan.

Incident Response

Node4 will establish an incident response structure and procedures to manage and respond to disruptive incidents in the form of an Invocation Plan.

This plan includes the procedures and management structure to respond to a disruptive incident using personnel with the necessary responsibility, authority, and competence to manage an incident.

The Invocation Plan is in place to:

- Identify impact thresholds that justify initiation of a business continuity response;
- Assess the nature and extent of a disruptive incident and its potential impact;
- Activate an appropriate business continuity response;
- Detail processes and procedures for the activation, operation, coordination, and communication of the response;
- Have resources available to support the processes and procedures to manage a disruptive incident to minimize impact;
- Communicate with interested parties and authorities.

Testing and Exercising

The BCMS and business continuity plan will be tested and exercised to ensure their effectiveness.

All Disaster Recovery Plans, along with the supporting Invocation plan will be tested annually, or when a significant change occurs.

A formal post-exercise report will be created that contain outcomes, recommendations and actions to implement improvements.

Results will be reported as part of the Business Continuity Management Review in order to ensure progression of improvement opportunities and treatment of risks.

Management Review

Node4 Management review the BCMS once per year to ensure its continuing suitability, adequacy and effectiveness.

Management reviews consider the performance of the organization, including:

- Actions from previous management reviews.
- The need for changes to the BCMS, including the policy and objectives.
- Opportunities for improvement.
- Results of BCMS audits and reviews.

- Techniques, products or procedures, which could be used to improve the BCMS' performance and effectiveness.
- Status of corrective actions.
- Results of exercising and testing.
- Risks or issues not adequately addressed in any previous risk assessment.
- Any changes that could affect the BCMS.
- Adequacy of policy.
- Recommendations for improvement.
- Lessons learned and actions arising from disruptive incidents.
- Emerging good practice and guidance.

Roles and Responsibilities

This section identifies who is responsible for implementing, enforcing, and monitoring the policy, using the RACI matrix.

Task	HoG	COO	Q&C	MS SLT	Employees
Who is responsible for complying with this policy		R	R	R	
Who is accountable for compliance to this policy	A				
Who needs to be consulted on this policy	C	C	C		
Who needs to be informed of this policy					I

Training & Communication

This Business Continuity Policy is made available to employees N4 Hub based on SharePoint, stored under the Governance site.

This Business Continuity Policy is also published on our website for access by relevant interested parties such as our clients.

All employees involved in incident response will be trained on the relevant policies and procedures that make up Node4's BCMS.

Related Documents

The following documents are related to this policy:

- N4 BCDR Invocation Plan.
- N4 Contingencies Plans.
- N4 Emergency Action Plan.