



SMA BUSINESS CONTINUITY PLAN

Document Version	22.1.02
Date	June 3, 2022

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1. INTRODUCTION

This Business Continuity Plan (BCP) captures, in a single repository, all information that describes SMA Technologies' (hereafter SMA) ability to withstand a qualifying event as well as the processes that must be followed to achieve Business Continuity.

2. DEFINITION OF A QUALIFYING EVENT

A qualifying event can be caused by man or nature and results in a disruption of SMA's normal operations for a period of time. SMA defines a qualifying event as one or more of the following (for the purposes of this Section 2, "The building" refers to SMA's colocation that houses our servers):

- *One or more vital systems are non-functional.*
- *The building is not available for an extended period of time, but all systems are functional within it.*
- *The building is available, but all systems are non-functional.*
- *The building and all systems are non-functional.*

The following qualifying events are examples of incidents that can cause the Business Continuity Plan to be activated:

- | | | |
|----------------------|--|-------------------------------------|
| • <i>Fire</i> | • <i>Freezing Weather /
Icy Conditions</i> | • <i>Theft</i> |
| • <i>Flash flood</i> | • <i>Pandemic</i> | • <i>Terrorist Attack</i> |
| • <i>Avalanche</i> | • <i>Power Outage</i> | • <i>Cyber Attack /
Hacking</i> |
| • <i>Hurricane</i> | • <i>War</i> | |
| • <i>Tornado</i> | | |

3. PURPOSE

The purpose of this document is threefold: first, to establish procedures for communicating with employees and customers during a qualifying event; second, capture and secure all of the information relevant to SMA's ability to withstand a qualifying event; and third, to document the steps that SMA will follow if a qualifying event occurs.

Note that in case of a qualifying event that could imperil the safety of our employees, SMA's first priority is to prevent the loss of life. Before any secondary measures are undertaken, SMA will ensure that all employees, and any other individuals on SMA's premises, are safe and secure.

After all individuals have been brought to safety, the next goal of SMA will be to enact the steps outlined in this document to bring SMA's groups and departments back to business-as-usual as quickly as possible. This includes:

- *Preventing the loss of SMA's resources such as hardware, data, and physical IT assets*
- *Minimizing downtime related to IT and communications*

- *Keeping SMA running in the event of a qualifying event*

This BCP document will also detail how this document is to be maintained and tested.

4. SCOPE

The BCP takes all of the following areas into consideration:

- | | | |
|---------------------------------|--|--|
| • <i>Network Infrastructure</i> | • <i>Data Storage and Backup Systems</i> | • <i>Organizational Software Systems</i> |
| • <i>Servers Infrastructure</i> | • <i>Data Output Devices</i> | • <i>Database Systems</i> |
| • <i>Telephony System</i> | • <i>End-user Computers</i> | • <i>IT Documentation</i> |

5. BUSINESS CONTINUITY TEAMS & RESPONSIBILITIES

In the event of a qualifying event, different groups will be required to assist in the effort to restore normal functionality to the employees of SMA. The different groups and their responsibilities are as follows:

- | | |
|---|--------------------------------|
| • <i>Business Continuity Co-Lead(s)</i> | • <i>Communication Team</i> |
| • <i>Business Continuity Team</i> | • <i>Finance Team</i> |
| • <i>People Ops Team</i> | • <i>Customer Support Team</i> |
| • <i>Infrastructure & Facilities Team</i> | |

The lists of roles and responsibilities in this section have been created by SMA and reflect the likely tasks that team members will have to perform. Business Continuity Team members will be responsible for performing the tasks described herein. In some qualifying event situations, Business Continuity Team members will be called upon to perform tasks not formerly described.

6. BUSINESS CONTINUITY CO-LEADS

The Business Continuity Co-Leads are responsible for communicating with the Infrastructure and Facilities Team Lead in formulating decisions relating to Business Continuity efforts. Their primary role will be to guide the Business Continuity process and all other individuals involved in the Business Continuity process will report to this team in case a qualifying event occurs at SMA, regardless of their department or existing managers.

6.1. ROLE AND RESPONSIBILITIES

- *Make the determination that a qualifying event has occurred and trigger the BCP and related processes*
- *Initiate the Employee Notification System*
- *Be the single point of contact for and oversee all other Business Continuity Teams*
- *Organize and chair regular meetings of the Business Continuity Team leads throughout the qualifying event*
- *Organize, supervise, and manage all BCP tests*
- *Author all BCP updates*

6.2. CONTACT INFORMATION

Click the following link for a current list of Business Continuity Co-Leads:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Linked%20Files/SMA%20BCP%20Teams%20Contact%20Listing.pdf>

7. BUSINESS CONTINUITY TEAM

The Business Continuity Team will oversee the entire Business Continuity process. They will be the first team to take action in case of a qualifying event. This team will evaluate the qualifying event and will determine what steps need to be taken to get the organization back to business as usual. Decisions such as constructing a new data center, relocating the primary site, etc., should be made by the Business Continuity Team.

7.1. ROLE & RESPONSIBILITIES

- *Set the BCP into motion after the Business Continuity Team has declared a qualifying event*
- *Determine the magnitude and class of the qualifying event*
- *Determine if legal authorities, such as the Police/Fire Departments or FBI/DGSE (France), should be notified*
- *Determine what systems and processes have been affected by the qualifying event*
- *Communicate the qualifying event to the other Business Continuity Teams*
- *Determine what first steps need to be taken by the Business Continuity Teams*
- *Keep the Business Continuity Teams on track with pre-determined expectations and goals*
- *Ensure that all decisions made abide by the BCP and policies set by SMA*
- *Direct the Infrastructure & Facilities Team Lead to secure a standby facility, if needed*
- *Direct the Communications Team to formulate any statements made to legal authorities, if determined necessary*
- *Direct the Communications Team in formulating any statements made to the media, if determined necessary*

- *Notify the relevant parties once the qualifying event is over and normal business functionality has been restored*
- *Assist the Business Continuity Teams in their role, as required*
- *Make decisions that will impact the company. This can include decisions concerning:*
 - *Relocation the primary facilities*
 - *Relocation of data centers*
 - *Significant hardware and software investments and upgrades*
 - *Other financial and business decisions*
- *Review the BC After Action Report for future decision making and action modifications*

7.2. CONTACT INFORMATION

Click the following link for a current list of Business Continuity Team:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Linked%20Files/SMA%20BCP%20Teams%20Contact%20Listing.pdf>

8. PEOPLE OPS TEAM

The People Ops Team will be responsible for assessing the welfare, needs, and availability of SMA’s employees. This team will serve as the primary contact for any direct personal employee communication. Unlike the Business Continuity Team that is responsible for keeping employees up to date on event changes, People Ops will work directly with any employee requiring assistance due to the qualifying event such as employee benefits or resources.

8.1. ROLE & RESPONSIBILITY

- Be available to assist employees with employee insurance, such as medical or life insurance
- Assist employees obtain emergency funds, if requested and approved
- Act as a liaison between the employees and the Business Continuity and Executive Leadership Teams
- Organize food, clothing, and/or furniture drives to assist any employee affected in such a way from the event
- Work with the Business Continuity Team on the BC After Action Report, if needed

8.2. CONTACT INFORMATION

Click the following link for a current list of People Ops Team:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Linked%20Files/SMA%20BCP%20Teams%20Contact%20Listing.pdf>

9. INFRASTRUCTURE & FACILITIES TEAM

The Infrastructure & Facilities Team will be responsible for assessing damage specific to any network and/or server infrastructure and for provisioning data and voice network connectivity including WAN, LAN, and any telephone connections internally within the enterprise, as well as telephone and data connections with the outside world. This team will also be responsible for all issues related to the physical facilities that house IT systems. They are the team that will be responsible for determining a standby facility, if needed, in the event of the primary location’s destruction or damage.

9.1. ROLE & RESPONSIBILITIES

9.1.1. STANDBY FACILITY NOT REQUIRED:

For the purposes of this document, “primary facility” refers to any SMA leased facility regardless of location.

- *Determine which network services are not functioning at the primary facility*
- *Prioritize the recovery of services in the manner and order that has the least business impact, if multiple network services are impacted*
- *Determine which servers are not functioning at the primary facility*
- *Prioritize the recovery of servers in the manner and order that has the least business impact if multiple servers are impacted. Recovery will include the following tasks:*
 - *Assess the damage to any servers*
 - *Restart and refresh servers, if necessary*
- *Determine which applications are not functioning at the primary facility*
- *Prioritize the recovery of applications in the manner and order that has the least business impact if multiple applications are impacted. Recovery will include the following tasks:*
 - *Assess the impact to application processes*
 - *Restart applications, as required*
- *Participate in the assessment of any physical damage to the primary facility*
- *Ensure that measures are taken to prevent further damage to the primary facility’s network/server infrastructure*
- *Work in conjunction with Operations in the event of damage, destruction or losses to network/server infrastructure owned or leased by SMA*
- *Determine the need for a standby temporary facility*

9.1.2. STANDBY FACILITY REQUIRED:

- *Operations Team*
 - *Secure a standby facility after performing a risk assessment*
 - *Get the standby facility ready to restore business operations*
 - *Ensure that the standby facility is fully functional and secure*
 - *Ensure that transportation is provided for all employees working out of the standby facility*

- *Ensure that hotels or other sleeping arrangements are made for all employees working out of the standby facility*
- *Ensure that sufficient food, drink, and other supplies are provided for all employees working out of the standby facility*
- **IT Support Team**
 - *Provide Operations with a list of IT Support Team’s standby facility requirements*
 - *In conjunction with Operations, get the standby facility ready to restore business operations*
 - *In conjunction with Operations, ensure that the standby facility is fully functional and secure*

9.2. CONTACT INFORMATION

Click the following link for a current list of Infrastructure & Facilities Team members:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Original%20Word%20Docs/SMABCP%20Teams%20Contact%20Listing.pdf>

10. COMMUNICATION TEAM

This team will be responsible for all communication as directed by the Business Continuity Team during a qualifying event. Specifically, they will communicate via phone, e-mail, and text with SMA’s clients and the media, if required.

10.1. ROLE & RESPONSIBILITIES

- *Communicate the occurrence and impact of a qualifying event to legal authorities, as directed by the Business Continuity Team*
- *Communicate the occurrence and impact of a qualifying event to all of SMA’s partners, as required*
- *Communicate the occurrence and impact of a qualifying event to all of SMA’s clients, as required*
- *Communicate the occurrence and impact of a qualifying event to media contacts, as directed by the Business Continuity Team*

10.2. CONTACT INFORMATION

Click the following link for a current list of Communications Team members:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Original%20Word%20Docs/SMABCP%20Teams%20Contact%20Listing.pdf>

11. FINANCE TEAM

This team will be responsible for ensuring that all of SMA's finances are dealt with in an appropriate and timely manner in the event of a qualifying event. The Finance Team will ensure that there is money available for necessary expenses that may result from a qualifying event, as well as expenses from normal day-to-day business functions.

11.1. ROLE & RESPONSIBILITIES

- *Ensure there is sufficient cash on hand or accessible to deal with small-scale expenses caused by the qualifying event. These may include paying for accommodations and food for Business Continuity Team members, incremental bills, etc.*
- *Ensure there is sufficient credit available or accessible to deal with large-scale expenses caused by the qualifying event. These may include paying for new equipment, repairs for primary facilities, etc.*
- *Review and approve Business Continuity Team's finances and spending*
- *Keep a record of money spent during the Business Continuity process*
- *Ensure that payroll occurs and that employees are paid as normal, where possible*
- *Communicate the occurrence and impact of the qualifying event to all of SMA's vendors, as required*
- *Communicate with creditors to arrange suspension or extensions to scheduled payments, as required*
- *Communicate with banking partners to obtain any materials such as checks, bank books, etc., that may need to be replaced as a result of the qualifying event*

11.2. CONTACT INFORMATION

Click the following link for a current list of Finance Team members:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Original%20Word%20Docs/MA%20BCP%20Teams%20Contact%20Listing.pdf>

12. CUSTOMER SUPPORT TEAM

This team will be responsible for ensuring that all of SMA's Customer Support operations continue uninterrupted in the event of a qualifying event. The Customer Support Team will ensure that SMA's clients continue to receive service and support as needed during the Business Continuity process.

12.1. ROLE & RESPONSIBILITIES

- *Identify who on the Customer Support Team will be handling support calls during the qualifying event*

- *Secure laptops and other necessary equipment and resources to conduct interim customer support operations*
- *Contact any clients with Customer Support open cases to advise them of the occurrence of the qualifying event and its impact on resolution of the request*
- *Respond to and resolve any additional Customer Support requests occurring during the Business Continuity process*

12.2. CONTACT INFORMATION

Click the following link for a current list of Customer Support Team members:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Original%20Word%20Docs/SMA%20BCP%20Teams%20Contact%20Listing.pdf>

In case a qualifying event is severe enough to require relocation, other support staff will relocate, as necessary and the SMA Customer Support Emergency Response Plan will be activated. Refer to Appendix D herein for details.

13. BUSINESS CONTINUITY EMPLOYEE NOTIFICATION SYSTEM

In a Business Continuity or Disaster Recovery emergency, time is of the essence. SMA may make use of a third party automated Employee Notification System or email to ensure that appropriate individuals are notified, as determined necessary.

The Business Continuity Team leads or designate will initiate the Employee Notification System by activating one of the saved scenarios within the system. This will allow the system to begin contacting all employees in the affected area by any or all of the following ways: cell phone app, phone call, text and/or email.

The Employee Notification System will ascertain the personal safety of each employee by way of response options (e.g., press 1 for "I'm okay", press 2 for "I'm displaced", etc.) and, if appropriate, will give instructions to the employee which may include:

- Whether it is safe for employees to come into the office
- Where they should go (if anywhere) if they cannot come into the office
- What services are available
- Work expectations of them during the qualifying event

Updates will be issued via the Employee Notification System, as deemed necessary by the Business Continuity Team.

14. RECOVERY FACILITIES

To ensure that SMA is able to withstand a significant outage caused by a qualifying event, the Business Continuity Team may determine the need for a separate dedicated standby facility should the majority of SMA's remote workforce be called into the office. This section of the BCP contains operational information should a standby facility need to be utilized.

14.1. DESCRIPTION OF RECOVERY FACILITIES

The standby facility will be used after the Business Continuity Team has declared that a qualifying event has occurred and a standby facility is needed. This location will be a separate location from the primary facility to be used by the Business Continuity Teams. It will function as a central location where all decisions will be made during the qualifying event and as a communications hub for SMA.

The standby facility must always have the following resources available:

- *Copies of this BCP document (hard or soft copy acceptable)*
- *Infrastructure to support business operations that cannot be supported from individual remote locations*
- *Office space for Business Continuity Teams to use in the event of a qualifying event, if necessary*
- *External data and voice connectivity*
- *Sleeping quarters for employees that may need to work multiple shifts*
- *Kitchen facilities (including food, kitchen supplies and appliances)*
- *Bathroom facilities (Including toilets, showers, sinks and appropriate supplies)*
- *Parking spaces for employee vehicles*

14.2. OPERATIONAL RISK CONSIDERATIONS

A risk assessment will be performed by the ISMS Steering Committee for validation of standby facility(ies) as per Section 8.1.2 of the BCP.

- Physical and Environmental Security Standard
<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Forms/AllItems.aspx?FolderCTID=0x012000E84B628D8685464CA296145B27564238&id=%2Fsites%2FISO27001%2FShared%20Documents%2FProduction%20Policies%2FPhysical%20and%20Environmental%20Security%20Standard%2Epdf&parent=%2Fsites%2FISO27001%2FShared%20Documents%2FProduction%20Policies>
- Network Security Standard
<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Forms/AllItems.aspx?FolderCTID=0x012000E84B628D8685464CA296145B27564238&id=%2Fsites%2FISO27001%2FShared%20Documents%2FProduction%20Policies%2FNetwork%20Security%20Standard%2Epdf&parent=%2Fsites%2FISO27001%2FShared%20Documents%2FProduction%20Policies>

As determined necessary, employees may be provided with transportation to the standby facility if they do not own vehicles or are unable to use them.

If employees are required to stay at the standby facility for extended periods of time and require hotel accommodations, such will be provided by SMA. The Business Continuity Team will be responsible for determining which employees require hotel accommodations and ensuring sufficient rooms are made available.

If employees are required to stay at the Standby Facility for extended periods of time and require food, it will be provided by SMA. The Business Continuity Team will be responsible for determining which employees require food and ensuring sufficient provisions are made available via groceries, restaurants, or caterers, as appropriate.

While in the standby facility, employees must work under appropriate, sanitary, and safe conditions. The Business Continuity Team will be responsible for ensuring that this facility is kept in proper working order.

15. COMMUNICATING DURING A QUALIFYING EVENT

In case of a qualifying event, SMA will need to communicate with various parties to inform them of the effects on the business, surrounding areas and timelines. The Communication Team will be responsible for contacting all of SMA's stakeholders.

15.1. COMMUNICATING WITH THE AUTHORITIES

Under the direction of the Business Continuity Team, the Communication team's first priority will be to ensure that the appropriate authorities have been notified of the qualifying event, providing the following information:

- *The location of the qualifying event*
- *The nature of the qualifying event*
- *The magnitude of the qualifying event*
- *The impact of the qualifying event*
- *Assistance required in overcoming the qualifying event*
- *Anticipated timelines*

15.2. AUTHORITIES CONTACTS

Click the following link to access Emergency Contact Information:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Original%20Word%20Docs/SMART%20BCP%20Emergency%20Contact%20Information.pdf>

15.3. COMMUNICATING WITH EMPLOYEES

Communicating the occurrence of a qualifying event and the impact of that qualifying event to all SMA employees via the Employee Notification System will be a priority for the Business Continuity Team.

The Business Continuity Team will ascertain the personal safety of the employees and, if appropriate, give the following instructions to the employees including:

- *Whether it is safe for them to come into the office*
- *Where they should go if they cannot work remotely and the office is not an option*
- *What services are available*
- *Work expectations of them during the qualifying event*

15.4. COMMUNICATING WITH CLIENTS

After SMA employees have been informed of the qualifying event, and if it is deemed necessary to do so, the Communication Team will be responsible for informing clients of the qualifying event and the impact that it will have on the following:

- *Anticipated impact on service offerings and delivery schedules (e.g., pending installs, upgrades, etc.)*
- *Anticipated impact on security of client information*
- *Anticipated timelines*

The Communication Team will coordinate with the Sales Team to determine the content of the message and to which clients the message will be sent.

15.5. COMMUNICATING WITH VENDORS

After SMA employees have been informed of the qualifying event, and if it is deemed necessary to do so, the Communication Team will be responsible for informing vendors of the qualifying event and the impact that it will have on the following:

- | | |
|--|---|
| • <i>Adjustments to service requirements</i> | • <i>Adjustments to contact information</i> |
| • <i>Adjustments to delivery locations</i> | • <i>Anticipated timelines</i> |

The Communication Team will coordinate with the Finance Team to determine the content of the message and to which vendors the message will be sent, beginning with vendors identified as crucial.

15.5.1. CRUCIAL VENDORS

Click the following link to access the list of Crucial Vendors:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Original%20Word%20Docs/SMACRUCIAL%20VENDORS%20CONTACT%20INFORMATION.pdf>

15.5.2. SECONDARY VENDORS

Click the following link to access the list of Secondary Vendors, including property managers for all locations:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Linked%20Files/SMA%20BCP%20Crucial%20&%20Secondary%20Vendor%20Contact%20Information.pdf>

Additional vendor contacts are located in SMA's system of record. A monthly report of vendor contact information will be sent to all necessary personnel to track contact information changes, etc.

15.6. COMMUNICATING WITH THE MEDIA

The Communication Team will be responsible for informing media outlets of the qualifying event (if necessary), at the direction of the Business Continuity Team, providing them with the following information:

- *An official statement regarding the qualifying event determined by the Business Continuity Team*
- *The magnitude of the qualifying event*
- *The impact of the qualifying event*
- *Anticipated timelines*

15.7. COMMUNICATING WITH OTHER STAKEHOLDERS

The Business Continuity Team will be responsible for informing other stakeholders of the qualifying event and the impact it may have.

15.7.1. INSURANCE CONTACTS

Click the following link for a list of professional and benefits Insurance Contacts:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Original%20Word%20Docs/SMMA%20BCP%20Crucial%20&%20Secondary%20Vendor%20Contact%20Information.pdf>

16. DEALING WITH A QUALIFYING EVENT

If a qualifying event occurs at an SMA facility, the first priority is to ensure that all employees are safe and accounted for. After this, steps must be taken to mitigate any further damage to the facility and to reduce the impact of the qualifying event to the organization.

Regardless of the category that the qualifying event falls into, dealing with a qualifying event can be broken down into the following steps:

- 1) Qualifying event identification and declaration

- 2) BCP activation
- 3) Communicating the qualifying event
- 4) Assessment of current damage and prevention of further damage
- 5) Standby facility activation, if necessary
- 6) Establish IT operations
- 7) Repair and rebuilding of primary facility

16.1. QUALIFYING EVENT IDENTIFICATION AND DECLARATION

Since it is almost impossible to predict when and how a qualifying event might occur, SMA must be prepared to find out about qualifying events from a variety of possible avenues. These can include:

- *Firsthand observation*
- *System alarms and network monitors*
- *Environmental and security alarms in the primary facility*
- *Facilities staff*
- *End users*
- *Third parties*
- *Media reports*

Once the Business Continuity Team has determined that the company is in an official state of qualifying event, they must ensure, to the best of their ability, that anyone that was in the primary facility at the time of the qualifying event has been accounted for and evacuated to safety according to the company's Evacuation Policy located in Addendum A of this document.

While employees/visitors are being brought to safety, the Business Continuity Team will instruct the Communication Team to begin contacting the proper authorities and Business Continuity Team will contact all employees not at the impacted facility where the qualifying event has occurred via the Employee Notification System.

17. BUSINESS CONTINUITY PLAN ACTIVATION

Once the Business Continuity Team has determined that the company is in an official state of qualifying event, they may initiate the activation of the BCP by triggering the Employee Notification System. The following information may be provided:

- *That a qualifying event has occurred or is expected to occur*
- *The nature of the qualifying event (if known)*
- *The initial estimation of the magnitude of the qualifying event (if known)*
- *The initial estimation of the impact of the qualifying event (if known)*
- *The initial estimation of the expected duration of the qualifying event (if known)*

- *Actions that have been taken to this point, including but not limited to the activation of the SMA Customer Support Emergency Response Plan*
- *Whether it is safe for employees to come into the office*
- *Where employees should go if they cannot come into the office and are unable to work remotely*
- *What services are available to employees*
- *Work expectations of employees during the qualifying event*
- *Any other pertinent information*

17.1. COMMUNICATING THE QUALIFYING EVENT

Refer to Section 14, “Communicating During a Qualifying event,” of this document.

18. SMA CUSTOMER SUPPORT EMERGENCY RESPONSE PLAN

As part of the BCP activation evaluation, it may be determined that it will be necessary to also activate the SMA Customer Support Emergency Response Plan (Support Plan). The Support Plan was developed to ensure continual and uninterrupted customer support during such time Unisoft’s primary customer support team is offline due to a disaster or other such event.

The Support Plan is incorporated into the BCP and is found in Appendix D herein.

Click the following link for a list of Customer Support Emergency Contacts:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Linked%20Files/SMA%20Customer%20Support%20-%20Emergency%20Response%20Plan%20Team%20Listing.pdf>

19. ASSESSMENT OF CURRENT AND PREVENTION OF FURTHER DAMAGE

Before any employees from SMA can enter the primary facility after a qualifying event, appropriate authorities and/or property management (see secondary vendors) must first ensure that the premises are safe to enter.

The first team that will be allowed to examine the primary facilities once it has been deemed safe to do so will be the Business Continuity Team. Once they have completed an examination of the offices, the Business Continuity Team will then allow other teams to examine the offices, as appropriate.

During each team’s review of their relevant areas, they must assess any areas where further damage can be prevented and take the necessary means to protect SMA’s assets. Any necessary repairs or

preventative measures must be taken to protect the facilities; these costs must first be approved by the Business Continuity Team.

20. STANDBY FACILITY ACTIVATION

The Standby Facility will be formally activated when the Business Continuity Team determines that the nature of the qualifying event is such that the primary facility is no longer sufficiently functional or operational to sustain normal business operations.

Once this determination has been made, the Business Continuity Team will be commissioned to locate a Standby Facility and bring it to functional status. The Business Continuity Team will convene a meeting with the Infrastructure & Facilities Team at the Standby Facility to assess next steps which may include any or all of the following:

1. *Facility risk assessment*
2. *Determination of impacted systems*
3. *Criticality ranking of impacted systems*
4. *Recovery measures required for high criticality systems*
5. *Assignment of responsibilities for high criticality systems*
6. *Schedule for recovery of high criticality systems*
7. *Recovery measures required for medium criticality systems*
8. *Assignment of responsibilities for medium criticality systems*
9. *Schedule for recovery of medium criticality systems*
10. *Recovery measures required for low criticality systems*
11. *Assignment of responsibilities for recovery of low criticality systems*
12. *Schedule for recovery of low criticality systems*
13. *Determination of facilities tasks outstanding/required at Standby Facility*
14. *Determination of operations tasks outstanding/required at Standby Facility*
15. *Determination of communications tasks outstanding/required at Standby Facility*
16. *Determination of facilities tasks outstanding/required at Primary Facility*
17. *Determination of other tasks outstanding/required at Primary Facility*
18. *Determination of further actions to be taken*

21. REPAIR & REBUILDING OF PRIMARY FACILITY

Before SMA can return operations to primary facilities, those facilities must be returned to an operable condition. The tasks required to achieve that will be variable depending on the magnitude and severity of the damage. Specific tasks will be determined and assigned only after the damage to primary facilities has been assessed.

22. RESTORING IT FUNCTIONALITY

Should a qualifying event actually occur and SMA need to exercise this plan, this section will be referred to frequently as it will contain information critical to the recovery of SMA's information systems.

Click the following link to access the System Recovery Tiers for both Short- and Long-Term Qualifying Events:

<https://sma1980.sharepoint.com/sites/ISO27001/Shared%20Documents/Linked%20Files/SMA%20BCP%20Restoring%20IT%20Functionality.pdf>

While efforts will be made initially to construct this BCP in as complete and accurate a manner as possible, it is essentially impossible to address all possible problems at any one time. Additionally, over time the Business Continuity needs of SMA will change. As a result of these two factors, this plan will need to be reviewed on a periodic basis to discover errors and omissions and will need to be maintained to address them.

22.1. MAINTENANCE

The BCP will be updated as required or any time a major system update or upgrade is performed, whichever is more often. SMA's ISMS Steering Committee will be responsible for updating the entire document, and so is permitted to request information and updates from other employees and departments within the organization in order to complete this task. Maintenance of the plan will include (but is not limited to) the following:

1. *Ensuring that employee contact information housed in the Employee Notification System is up to date*
2. *Ensuring that all team lists are up to date*
3. *Reviewing the plan to ensure that all of the instructions are still relevant to the company*
4. *Making any major changes and revisions in the plan to reflect organizational shifts, changes, and goals*
5. *Ensuring that the plan meets any requirements specified in new laws and follows SMA's ISMS policies and procedures*
6. *Other organizational specific maintenance goals*

During the maintenance periods, any changes to the Business Continuity Team must be accounted for. If any member of a Business Continuity Team no longer works with the company, it is the responsibility of the Business Continuity Team to appoint a new team member.

22.2. TRAINING

SMA is committed to the safety of its employees and to providing continuing operations for its clients during a qualifying event. Annual training sessions will be held for all employees to outline the Business

Continuity processes and procedures contained in this document. During the annual testing phase (see Section 22.4 below), the employees will be asked to confirm they have read and understand the SMA Business Continuity Plan.

22.3. TESTING

SMA is committed to ensuring that this BCP is functional. The BCP will be reviewed annually or as necessary to ensure that it is still effective. Testing the plan may include any or all of the following scenarios:

- 1) **Walkthroughs** - Team members verbally go through the specific steps as documented in the plan to confirm effectiveness, identify gaps, bottlenecks, or other weaknesses. This test provides the opportunity to review the plan with a larger subset of people, allowing the Business Continuity Team to draw upon a correspondingly increased pool of knowledge and experiences. Staff should be familiar with procedures, equipment, and offsite facilities (if required).
- 2) **Simulations/Testing** - A qualifying event is simulated so normal operations will not be interrupted. Hardware, software, personnel, communications, procedures, supplies and forms, documentation, transportation, utilities, and alternate site processing should be thoroughly tested in a simulation test. However, validated checklists can provide a reasonable level of assurance for many of these scenarios. The Business Continuity Team will analyze the output of the previous tests carefully before the proposed simulation to ensure the lessons learned during the previous phases of the cycle have been applied.
- 3) **Parallel Testing** - A parallel test can be performed in conjunction with the checklist test or simulation test. Under this scenario, historical transactions, such as the prior business day's transactions are processed against preceding day's backup files at the standby facility. All reports produced at the standby facility for the current business date should agree with those reports produced at the alternate processing site.
- 4) **Full-Interruption Testing** - A full-interruption test activates the total BCP. The test is likely to be costly and could disrupt normal operations, and therefore should be approached with caution. The importance of due diligence with respect to previous BCP phases cannot be overstated.

Any gaps in the BCP that are discovered during the testing phase will be documented and addressed by the Business Continuity Team, as well as any resources they will require.

22.4. EMPLOYEE NOTIFICATION SYSTEM TESTING

The Employee Notification System is a major part of the BCP, and SMA requires that it be tested every year to ensure that it remains functional. As employee confidentiality is a high priority for SMA, all information stored in the system will be treated as such. Tests will be performed as follows:

- 1) The Business Continuity Team initiates an email blast via the Employee Notification System to employees asking them to verify their contact methods.
- 2) The employee will confirm by response that the notification methods are correct. In the event that changes are necessary, the employee will be contacted by the ISMS Manager or his designee.
- 3) All responses to the test notification shall be stored as documentation of the test and its results.
- 4) These steps will be repeated for any employee that did not respond to the initial test or subsequent tests until all employee contact information has been verified.

23. AFTER ACTION REPORTING

After each initiation of the BC Plan, the event shall be documented in the Security BCP Activation module in SMA's system of record. This exercise is completed for the purpose of evaluating and documenting the event. The subsequent report should contain a summary of the qualifying event and the steps taken to work through it. The report should also contain any pertinent details about the BC process results that need to be evaluated by the Business Continuity Team for possible modification should similar incidents occur in the future.

24. OWNERSHIP AND REVIEW

This standard is owned by the ISMS Manager.

This standard shall be reviewed on an annual basis.

Changes to this document shall be in accordance with the *ISMS Document and Records Control Standard*.

25. CONTACT INFORMATION

ISMS Steering Committee
 (281)446-5000
 ISMS@SMAtechnologies.com

25.1. DOCUMENT RACI

Responsible	Assigned to do the work	ISMS Manager
Accountable	Final decision, ultimately answerable	ISMS Steering Committee
Consulted	Consulted BEFORE an action or decision is taken (proactive).	Executive Leadership Team
Informed	Informed AFTER a decision or action has been taken (reactive).	Named participants in this document. Other parties affected by the change.

Appendix A

SMA EVACUATION PLAN

The purpose of this plan is to prepare SMA employees for dealing with emergency situations which require evacuation of the work premises. This plan is designed to minimize injury and loss of human life and applies to all emergencies that may reasonably be expected to occur including:

- *Fire*
- *Chemical Spill*
- *Bomb Threat*
- *Building/Structure Collapse*

EVACUATION LEADS & RESPONSIBILITIES

EVACUATION MANAGERS

The Evacuation Manager will be responsible for notifying all employees as soon as possible via an appropriate method, based on the independent office location setup, of the need to evacuate. Once the office has been secured, the Evacuation Manager should exit the building via the posted evacuation routes.

Office location evacuations will be coordinated by the following designees:

- Houston, Texas - CTO
- Nancy, France – Sales Support Manager EMEA
- Massy, France – Product Specialist

EVACUATION PROCEDURES

The first priority is the safety of employees and visitors.

Fire extinguisher locations are clearly marked throughout each office.

Under no circumstances should any employee attempt to fight a fire that has passed the incipient stage (that which can be put out with a fire extinguisher), nor should any employee attempt to enter a burning building for any reason. These actions should be left to emergency personnel who have the appropriate training.

Calmly and quickly evacuate the building according to the posted evacuation routes.

Appendix B

SEVERE WEATHER PLAN

The purpose of this plan is to provide a course of action to be used during a severe weather event including:

- *Heavy Thunderstorms*
- *Flooding*
- *Hurricanes*
- *Tornadoes*
- *Freezing Weather/Icy Conditions*
- *Avalanches*

The Business Continuity Team will monitor correspondence from property management regarding building accessibility, as well as news and weather sources for forecasts and warnings. The Business Continuity Team will initiate the Severe Weather Plan, if deemed necessary.

If there is sufficient advanced warning:

The Business Continuity Team, or designee, will direct all managers to prepare for the weather event. This includes securing equipment and/or moving items away from windows and doors where necessary.

If Severe Weather occurs outside of regular business hours:

The Business Continuity Team will determine

- *If the SMA offices are open and accessible*
- *Whether it is safe for employees to come into the office*
- *Where employees should go (if anywhere) if they cannot come into the office and are unable to work remotely*
- *What services are available to employees*
- *Work expectations of employees during the qualifying event*

The Business Continuity Team will initiate the Employee Notification System to contact employees in a timely manner and provide necessary instructions.

If Severe Weather occurs during regular business hours:

Calmly and quickly move to the interior of the building, unless instructed otherwise, until the danger has passed.

Do not subject yourself to personal injury just to secure equipment.

Consideration will be given to employees who live in areas which may be more severely affected by inclement weather. When appropriate, those employees working in the office will be allowed to leave within a reasonable time to get home safely.

Appendix C

FIRST AID PROCEDURES

First Aid Kits are located in each office location and are clearly marked.

In the case of a minor emergency, any employee may use the supplies provided to render first aid to themselves.

Whenever possible, only employees who have been trained in, and feel comfortable with, providing First Aid and/or CPR should render aid to another employee or visitor.

In the case of a major emergency and/or injury requiring greater treatment than first aid, US: **DIAL 9-1-1** or Europe: **DIAL 1-1-2**. Keep the victim calm. Any treatment required beyond the level of training for which the employee is certified must be handled by emergency medical personnel.

Appendix D

SMA CUSTOMER SUPPORT EMERGENCY RESPONSE PLAN

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