



SUNRISE GILTS & SECURITIES PRIVATE LIMITED

BUSINESS CONTINUITY POLICY

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Approvals

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PRATIK KUMAR MORE	Business Continuity Policy	28/05/2025	1.1
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BUSINESS CONTINUITY POLICY

1.1. PURPOSE

The purpose of this BCM policy is to:

- State the senior management commitment to Business Continuity at SUNRISE GILTS & SECURITIES PRIVATE LIMITED.
- Define the overall approach to the development, implementation, testing and maintenance of a Business Continuity Management program.
- Provide direction for management to prepare company-wide business continuity plans and pre-position personnel and resources to mitigate the effect of a business interruption.
- Develop business continuity management programs to support SUNRISE GILTS & SECURITIES PRIVATE LIMITED business objectives and continued delivery of essential services during a business interruption.
- Protect critical SUNRISE GILTS & SECURITIES PRIVATE LIMITED infrastructure and assets necessary to sustain business continuity.
- Establish SUNRISE GILTS & SECURITIES PRIVATE LIMITED wide guidelines for the identification, analysis and treatment of potential business continuity risks to SUNRISE GILTS & SECURITIES PRIVATE LIMITED services, programs or operations.
- Continuously promote SUNRISE GILTS & SECURITIES PRIVATE LIMITED wide business continuity practices, training and awareness for employees.

1.2. SCOPE

- All staff (permanent and on contractual basis) and non-employees (interns, contractors, vendors, suppliers and consultants) and other individuals, entities or organizations responsible for administering and maintaining SUNRISE GILTS & SECURITIES PRIVATE LIMITED Information processing systems.
- All Information assets involving data, applications, network, security devices, servers and other IT system.

1.3. POLICY STATEMENT



Ensuring the continuity of our services is essential to uphold the interests of key stakeholders, reputation, brand and value creating activities.

1.3.1 GENERAL STATEMENTS

BCM plays a vital role in achieving this vision by ensuring the right framework is in place to:

- Protect our people, systems and infrastructure
- Identify and mitigate risks to an acceptable level
- Manage any disruption to minimize its impact

SUNRISE GILTS & SECURITIES PRIVATE LIMITED Business Continuity Management Policy requires:

- Human safety to be our first priority under all circumstances.
- Senior Management to own the management of key risks to the continuity of the SUNRISE GILTS & SECURITIES PRIVATE LIMITED operations.
- Development of appropriate plans and procedures that enable us to continue to provide our customers with required services or products, within an agreed time frame
- Heads of business units and support functions to own the management of key risks to their respective functions, and to develop, review and rehearse their own continuity plans at least annually.

1.3.2 BCM LIFECYCLE

The BCM lifecycle shall include the following stages:

Business Impact Analysis

- A comprehensive Business Impact Analysis must be conducted to evaluate the impact of an interruption in terms of damage scale and recovery period.
- The Business Impact Analysis must consider financial, operational, reputational impact of an interruption along with risks arising out of non-compliance with legal, contractual, or regulatory requirements.
- Business Impact Analysis must also include identification of potential risks and threats to critical business activities both internally and from the external environment.

Business Continuity Plans

- Business Continuity plans must be developed and implemented to mitigate the impact of a disruption on critical processes identified through Business Impact Analysis.
- Disaster Recovery procedures must be developed to quickly recover and restore business operations in the required time scales following interruption to, or failure of, critical business processes.

Testing



- Business Continuity plans must be tested at least annually to identify incorrect assumptions, oversights, or changes in people, processes, or technology.
- Test results should be used to revise the plans.
- Observations noted during tests should be remediated and tracked until closure.

Review

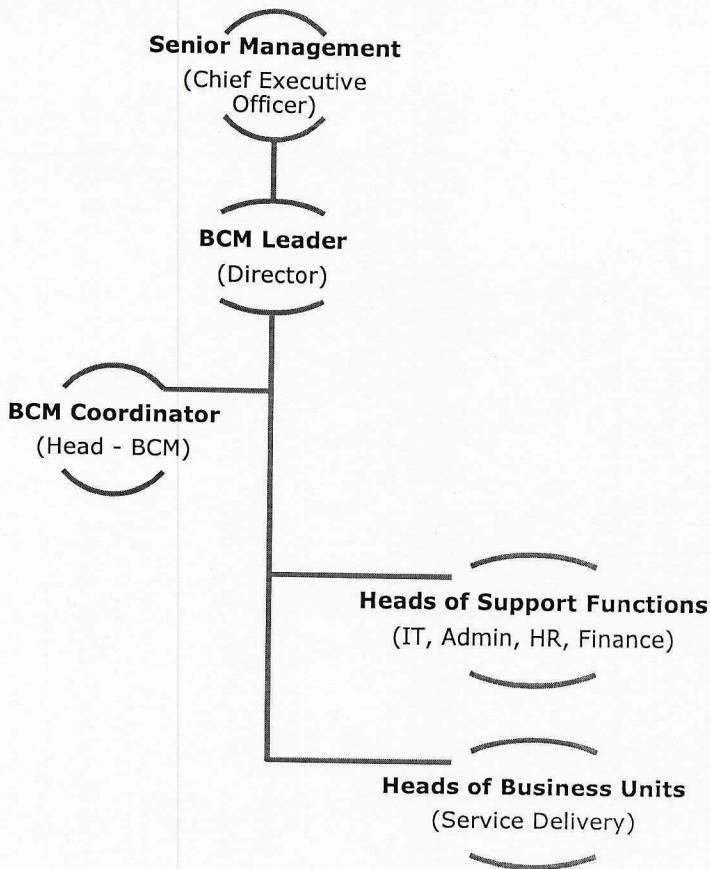
- Business Impact Analysis and Business Continuity plans must be reviewed at least annually and kept always updated.
- An interim review of Business Impact Analysis and Business Continuity plans should be undertaken whenever any of the following occurs:
 - Significant changes in the internal business process, systems, or infrastructure
 - Significant changes in the external business environment – such as market or regulatory change.

1.3.3 ORGANIZATION STRUCTURE

Governance Model

- Senior Management shall delegate executive responsibilities to the BCM committee.
- The BCM Committee is a core group comprised of representative from cross-functional areas covering key business units and support functions.
- The BCM Leader will lead activities of the BCM Committee.
- Each member within the BCM organization structure should have a nominated backup/alternate who can execute responsibilities in his absence.





1.3.4 ROLES AND RESPONSIBILITIES

Senior Management

- Assume responsibility for overall direction and coordination of BCM.
- Ensure that appropriate resources are provided to implement this Policy, and to ensure that it is properly communicated and understood throughout the organization.
- Establish communication with external stakeholders (investors, clients, media, etc.) during an emergency.
- Appoint the BCM Leader who will have the authority to take executive decisions before, during or after a disaster.
- Resolve any issues escalated from the BCM Committee.

BCM Leader

- Assume executive responsibilities for SUNRISE GILTS & SECURITIES PRIVATE LIMITED BCM program.
- Report and be accountable to the Senior Management for effective management of the BCM program.



- Chair and supervise the activities of the BCM Committee.
- Trigger initiation of recovery procedures during an emergency/disaster scenario.
- Establish communication with internal stakeholders (employees, contractors, third-parties, etc.) during an emergency situation.
- Appoint other members of the BCM Committee.

BCM Committee

- Convene regularly to review the status of the BCM program.
- Ensure appropriate continuity plans are developed, implemented, and rehearsed across all operational teams, support functions, service partners and suppliers.
- Verify that essential business processes can be restored within required timescales by use of such plans.
- Focus on specific key corporate threats as appropriate (e.g. industrial action, pandemic).
- Review and evaluate the implications incidents and near misses on existing plans.
- Ensure appropriate communication and escalation arrangements are in place to ensure staff can be contacted in an emergency.
- Take part in BCM training and workshops.

BCM Coordinator

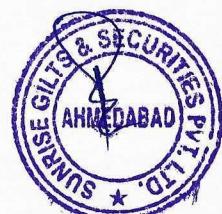
- Conduct business impact analysis and business continuity risk assessments.
- Lead and manage disaster-assessment efforts.
- Lead and coordinate the development of corporate and functional business continuity plans.
- Lead efforts to conduct review and audit of BCP at least once annually.
- Coordinate activities of the BCM Committee during a disaster scenario.
- Organize periodic trainings and workshops for the BCM Committee.

Heads of Business Units and Support Functions

- Represent their function on the BCM Committee.
- Support the BCM Committee by providing tactical response to an emergency or disaster.
- Identify and prioritize the critical business processes within their functions by performing a business impact analysis.
- Develop, review, test and maintain Business Continuity plans and procedures specific to their team.
- Identify and raise to the BCM Committee any continuity-related issues affecting their business units / functions.
- Ensure all employees in their team are aware of their individual responsibilities – and are trained and rehearsed to discharge them.

1.3.5 BCM PROCESS

The process includes the following stages:



- Form a Business Continuity Management Division & BCM Champions, working group & SUNRISE GILTS & SECURITIES PRIVATE LIMITED Management Team.
- A Business Impact Analysis has already been conducted to ascertain the effects of a loss of product and services review its scope, assumptions, and findings.
- This recommendation will enable SUNRISE GILTS & SECURITIES PRIVATE LIMITED Management team to set priority & finalize scope.
- Document the rationale behind excluding products, services, and locations from BCM.
- Provide SUNRISE GILTS & SECURITIES PRIVATE LIMITED Management Team with the evaluation report to choose options.
- If Business Continuity is the chosen approach for a particular product or service, then it is necessary that suitable measures are put in place to ensure that the various activities supporting their delivery can be continued or recovered within the required timescales.
- For those products and services that are deemed out of scope, the business risk of loss or non-availability is not mitigated by SUNRISE GILTS & SECURITIES PRIVATE LIMITEDBCM. The choices available to SUNRISE GILTS & SECURITIES PRIVATE LIMITED Management are:
 - **Acceptance** – accept that it is at risk of being disrupted
 - **Transfer** – transfer the risk of disruption to a third party
 - **Change, suspend or terminate** the product or service

Business Continuity management involves the following basic steps:

- Prioritising the businesses to be recovered by conducting a Business Impact Analysis (BIA)
- Performing a Risk Assessment (aka Risk Analysis) for each of the SUNRISE GILTS & SECURITIES PRIVATE LIMITEDServices to identify the assets, threats, vulnerabilities, and countermeasures for each service.
- Evaluating the options for recovery
- Producing the Contingency Plan
- Testing, reviewing, and revising the plan on a regular basis

Information security aspects of business continuity management

SUNRISE GILTS & SECURITIES PRIVATE LIMITED Business Continuity Policy is based on its business needs and external requirements are established, documented, and periodically reviewed. SUNRISE GILTS & SECURITIES PRIVATE LIMITED Business Continuity policy and associated controls shall take account of:

- Security issues for particular data systems, given business needs, anticipated threats and vulnerabilities
- All relevant legislative, regulatory and certificatory requirements
- Relevant contractual obligations or service level agreements
- other organizational policies for information access, use and disclosure
- consistency among such policies across SUNRISE GILTS & SECURITIES PRIVATE LIMITED systems and networks



A managed process should be developed and maintained for business continuity throughout SUNRISE GILTS & SECURITIES PRIVATE LIMITED that includes information security requirements needed for SUNRISE GILTS & SECURITIES PRIVATE LIMITED business continuity.

These security considerations should be integrated with the testing of business continuity plan implementations.

Control includes:

- Identification of information assets involved in critical business processes
- A risk assessment that addresses likely causes and consequences of information system failures
- Identification and consideration of preventive and mitigating controls in light of these risks
- Identification of sufficient financial, technical, and human resources to address the preventive/mitigating control requirements
- Development and documentation of business continuity plans and processes, including assignment of responsibilities and incorporation into SUNRISE GILTS & SECURITIES PRIVATE LIMITED general processes and structure
- Regular testing and updating of business continuity plans and processes

Business continuity and risk assessment

The objective of this control is to ensure that Events that can cause interruptions to SUNRISE GILTS & SECURITIES PRIVATE LIMITED business processes shall be identified, along with the probability and impact of such interruptions and their consequences for information security.

Strategies should consider the different risk environment and the degree of risk mitigation necessary to protect the institution in the event the continuity plans must be implemented.

Control includes:

- Identification of all significant risk or risk categories, including the probability and probable impact on operations in terms of scale, likely damage, and recovery period
- Full involvement of owners of significant organizational assets in the assessment process
- Identification of acceptable and unacceptable losses and interruptions
- Formal documentation of the assessment's results, and a plan for regular updating to ensure completeness and currency

Developing and implementing continuity plans including informationsecurity

The objective of this control is to ensure business continuity plans should be developed and implemented to maintain or restore operations and ensure availability of information at the



required level and in the required time, following interruptions to or failures of SUNRISE GILTS & SECURITIES PRIVATE LIMITED business processes.

Control includes:

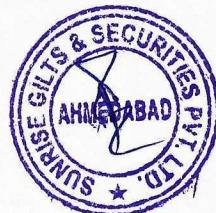
- Identification and agreement on all responsibilities and operational procedures
- Specification of the disaster recovery/business continuity procedures to effect recovery and restoration of business processes
- A data backup plan to ensure recovery of all data following process restoration, including the ability to replicate exact copies of data in its state prior to disruption of operations
- Specification of alternative operational procedures to follow pending completion of recovery and restoration, including methods for accessing all critical data
- Documentation of the above plan elements
- Appropriate education and awareness efforts for staff on the plan element
- Testing and updating of the plan

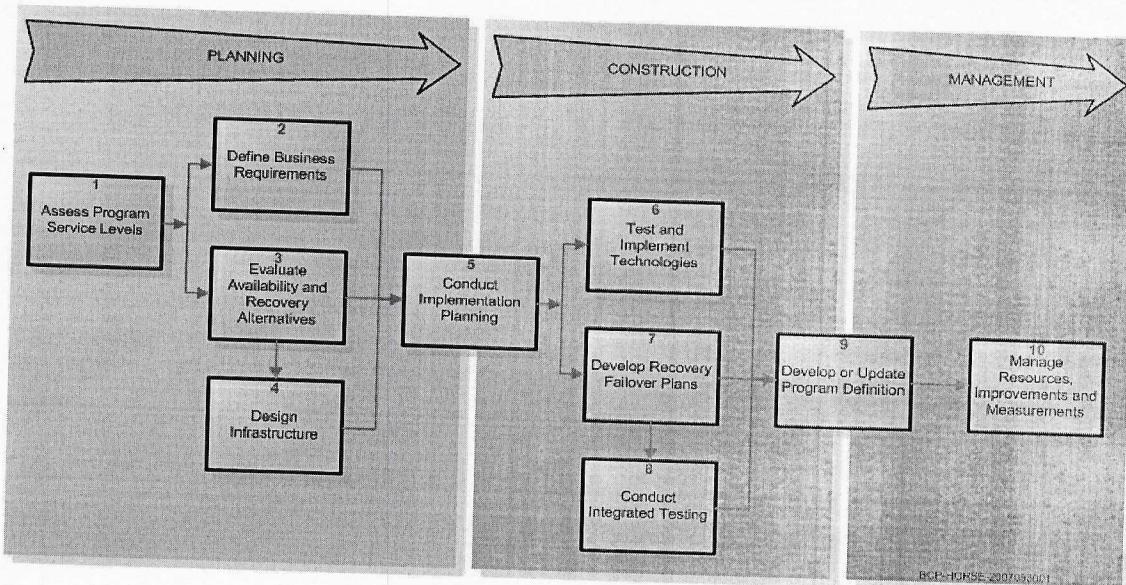
Business continuity planning framework

The objective of this control is to ensure a single framework of business continuity plans should be maintained at SUNRISE GILTS & SECURITIES PRIVATE LIMITED to ensure that all plans are consistent, assess information security requirements, and to identify priorities for testing and maintenance.

Control includes:

- Specification of conditions and criteria for activating the plan
- Formal assignment of responsibilities for making assessments about plan activation, choices among emergency procedures and processes, resumption procedures, etc.
- Make informed choices that reveal the right cost benefit trade-offs for your business continuity program. Always analyse availability and recovery alternatives, recommend a business continuity strategy that meets the defined business requirements, and provide technical solutions identifying high level cost and benefits for each alternative.
- This diagram illustrates the basic decision process flow to successfully accomplish SUNRISE GILTS & SECURITIES PRIVATE LIMITED business continuity program requirements.





Testing, Maintaining and Re-assessing Business Continuity Plans

The objective of this control is to ensure that SUNRISE GILTS & SECURITIES PRIVATE LIMITED business continuity plans shall be tested and updated regularly to ensure that they are up to date and effective.

Control includes:

- Testing that assures that all persons with significant responsibilities under the plan(s) are aware of and competent to perform them.
- A range and frequency of testing exercises, from table-top to complete rehearsals, performed as necessary to ensure awareness and competence
- Regular reviews and updating of the plan(s) considering testing results

