

Business continuity narrative

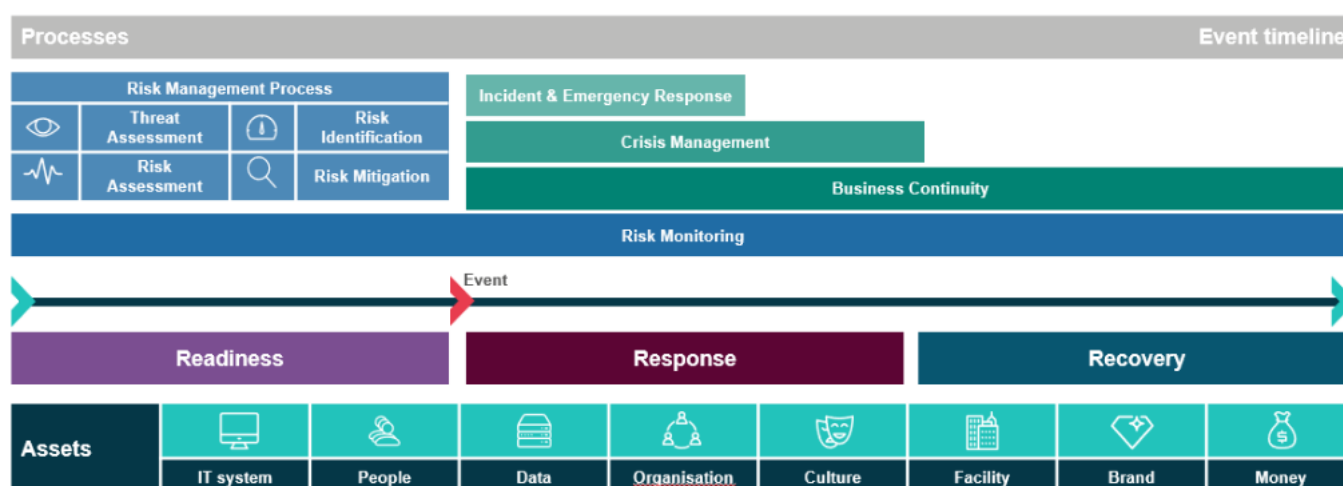
Owner: Group Risk Director | Author: Senior Risk Officer | Approved: 19.09.2025 | Version: 1.0 | Classification: Public

Introduction

At Control Risks, considered risk-taking is central to what we do, it enables us to make informed decisions, seize opportunities, and maintain a competitive edge. We recognise that disruption is inevitable, and our strength lies in our ability to respond effectively and emerge more resilient. Robust preparedness is the foundation of successful response and recovery.

To support continuity of service during disruptive events, we have developed our **Readiness, Response and Recovery (“3R”) Programme**. This framework is designed to safeguard the consistent delivery of high-quality service to our clients, even in the face of significant challenges.

The following summary outlines the key components of our 3R Programme.



The 3R Programme is underpinned by two pillars, business continuity methodology and programme governance:

1. Business continuity methodology

The following summarises each component of our business continuity methodology:

1.1. Business Impact Analysis (“BIA”)

Control Risks conducts Business Impact Analyses (“BIAs”) to identify potential risks associated with operational disruptions and to determine which processes are critical to maintaining service delivery for our clients and employees. These assessments evaluate the potential impact of disruptions on key functions and define the requirements needed to sustain those processes during and after an incident. BIAs are carried out across our global operations, with findings consolidated and reviewed to inform our continuity planning and resilience strategies.

1.2. Strategy selection

Control Risks develops and implements recovery strategies based on the key disruption-related risks identified across our operations, as well as the specific needs highlighted through our BIAs. These strategies may include remote working capabilities, scenario-based planning, and regular testing of continuity plans. Each approach is designed to minimise the impact of disruption and ensure the continued delivery of services to our clients and support for our employees.

1.3. Planning

The development and maintenance of Business Continuity Plans (“BCP”) are essential to managing disruptions effectively and efficiently. These plans are informed by our BIAs and the recovery strategies selected to address identified risks. Ownership of the plans sits with key leaders across Control Risks’ global operations, ensuring relevance and accountability. All plans follow a standardised framework to promote consistency and clarity across the organisation.

1.4. Training and awareness

At Control Risks, we recognise that effective disruption management begins with proactive preparation. Our training approach is centered around practical exercises, which provide employees, particularly those with direct incident response responsibilities, with the opportunity to rehearse their roles, test BCPs, and strengthen their confidence in managing real-world scenarios. These exercises form the foundation of our training and awareness efforts, helping to ensure readiness across the organisation.

1.5. Testing and maintenance

To ensure BCPs remain effective and relevant, Control Risks conducts regular testing using a range of approaches designed to reflect the types of disruptions we may face. These exercises validate core recovery procedures and provide insight into how plans perform under simulated conditions. Outcomes are carefully reviewed, and any identified gaps may be addressed through updates to the plans. Plan owners are also responsible for ongoing monitoring of internal and external factors that may affect their continuity strategies, ensuring plans are kept current and fit for purpose.

1.6. Programme monitoring and reporting

Programme activities are regularly monitored by Group Risk Team, the Internal Audit Team, and our Risk Committee. As part of this oversight, any identified gaps are tracked, addressed, and followed through until they are resolved in line with our Business Continuity objectives.

2. 3R programme governance

Control Risks’ 3R Programme is supported by a robust governance and ownership structure, ensuring accountability and alignment with our broader risk management framework.

2.1. Training and exercises

Effective incident and crisis management begins with preparation. At Control Risks, training and exercise sessions are designed to verify and reinforce roles and responsibilities, provide a safe environment to practice response procedures, and validate the effectiveness of our Incident, Crisis and Business Continuity Management Plans. This proactive approach helps us identify areas for improvement and ensures we are well-prepared to maintain continuity of service in the face of disruption.

2.2. Group Risk Team

Control Risks' Readiness, Response and Recovery ("3R") programme is overseen by our Group Risk function, ensuring alignment with our broader risk management activities. As part of our commitment to maintaining a resilient service environment, we conduct regular reviews and support exercises, including:

- Annual assessments of functional, regional, and service line risk registers
- Annual reviews of BIAs
- Scenario-based testing and evaluation of BCPs

These activities may also be carried out on an ad hoc basis in response to evolving threats or risks. In addition, training is provided to relevant teams and plan owners as needed to ensure preparedness and awareness across the organisation.

2.3. Post incident review

As part of our commitment to continuous improvement, Control Risks conducts Post-Incident Reviews following any significant disruption. These reviews help us identify opportunities to enhance our BCPs and protocols. By learning from each incident, we strengthen our internal response capabilities and reinforce the resilience of the services we deliver to our clients.

2.4. Alignment with business continuity standards

The Control Risks 3R programme is grounded in widely accepted business continuity principles and incorporates key elements from several recognised Business Continuity standards. While we do not follow a single external standard exclusively, the core components of our Business Continuity Programme are broadly aligned with the expectations and best practices outlined across most leading frameworks, such as ISO 22301.

3. Disclaimer

Our 3R Programme is designed to support our ability to prepare for, respond to, and recover from significant disruptions, with the goal of minimising impact to our clients, employees and our business.

The information provided in this document offers a high-level overview of our Readiness, Response and Recovery framework. Due to the sensitive nature of our recovery strategies and detailed BCPs, we do not share these documents with clients, partners, or other external parties (e.g., media).