

## **BUSINESS CONTINUITY POLICY**

In accordance with national legislation and international standards, SPA FINANCIAL SERVICES LTD has adopted a Business Continuity Policy and a Business Continuity Plan in order to ensure that the company shall remain operational in the event of an emergency.

SPA FINANCIAL SERVICES LTD recognizes the importance of serving clients during an emergency and the potential strategic, financial and reputational risks associated with interruptions. The company's Business Continuity Policy and Plan are based on risk assessment that considers potential losses due to unavailability of service versus the cost of resumption.

The Policy sets the principles of emergency response to any interruption and the framework according to which SPA FINANCIAL SERVICES LTD shall resume, restore and recover its activities in case of crisis. Business Continuity Policy guides the development and maintenance of the company's Business Continuity Plan.

The Policy provides guidance for the resumption and recovery of time sensitive business operations in accordance with pre-established timeframes. It also ensures that adequate arrangements are in place for the less time sensitive business operations.

Policy and Plan apply to all staff, facilities and systems. SPA FINANCIAL SERVICES LTD shall be prepared to deal with extreme scenarios, such as hardware or telecommunication failure, data corruption or power outage as well as natural disasters or other events leading to loss of the company's main operating site.

The Risk Management function of SPA FINANCIAL SERVICES LTD is responsible for the Policy and for the development and implementation of the Plan.