BUSINESS CONTINUITY MANAGEMENT OVERVIEW SOCIETE GENERALE INTERNATIONAL LTD

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DISCLAIMER

This paper is intended to provide a general overview of SG International Ltd's Business Continuity Management framework and does not constitute a legally binding contract or service level agreement. SG shall not be held legally liable by the arrangements detailed herein

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1. INTRODUCTION

SG International Ltd is committed to Business Continuity Management as a critical discipline, which enables us to maintain resilience of our business activities and our capacity to effect a swift and efficient recovery, to ensure the safety and integrity of our staff, clients and contractors as well as to preserve Société Générale's reputation, image and brand in the event of a disruption to our activity.

Business Continuity Management is part of SG International Ltd's operational risk mitigation processes and is a key contributor to SG's global operational risk management framework.

2. BCM PRINCIPLES AT SG INTERNATIONAL LTD

Sound Business Continuity Management enables SG International Ltd to:
- Successfully respond to and manage disruptive events, disasters and crises;
- Recover or continue critical business activities in the event of a business disruption

Most importantly, Business Continuity Management at SG International Ltd also includes the definition and execution of the overall ongoing programme that ensures that crisis management, business continuity and disaster recovery plans are adequately designed, maintained, updated and tested through regular reviews, training and exercises.

3. ORGANISATION AND GOVERNANCE

Business Continuity Management is fully integrated in the organisation and operations of Paris Head Office and in our offices worldwide.
Société Générale's global BCM programme is supported through dedicated BCM positions at each level of the organization across the Group. This coverage is:
- Business aligned: Business Continuity correspondents in Business Lines and dedicated support functions;
- Geographically aligned: BCM coordination is ensured locally or regionally by dedicated staff in locations where Société Générale has a presence

A central department within SG's Global Banking and Investor Solutions (GBIS) division, dedicated to operational risk management and headed by the Global BCM Director, is responsible for the division's global BCM organization. This central department supports GBIS' business units in their BCP endeavours by providing them with continually improved standards, methodology and tools, as well as providing expert assistance in designing effective recovery solutions.
Worldwide BCM compliance is controlled by the Group Internal Audit department which regularly conducts audit reviews of Business Continuity Management practices within business units or locations.

The quarterly GBIS BCM Decisional Board is responsible for BCM governance within the GBIS division and is chaired by GBIS' Chief Operating Officer. The main responsibilities of the board are:
- Defining GBIS' overall BC strategies and objectives;
- Endorsing policies;
- Approving BCM initiatives and budgets;
- Escalating any persistent issues to GBIS' CEO

4. CRISIS MANAGEMENT

In order to respond to an incident and to activate and manage its Business Continuity plans, SG International Ltd has defined and established a detailed Crisis Management structure.

The SG International Ltd Crisis Management organisation enables the bank to assess the impact of any incident and to respond in the appropriate manner by either partially or fully invoking its pre-defined business continuity plans, according to the severity of the situation.

The SG International Ltd Crisis Management structure incorporates pre-determined Command Centre facilities, resources and communication devices that are continuously updated and upgraded. All roles within the organisation are fully defined, understood and rehearsed.

5.   COMPREHENSIVE AND FLEXIBLE BCM SOLUTIONS

Business Continuity solutions required by a business unit to support its recovery strategies, such as seats and workstations at an alternate site or backup IT applications, form an integral part of that business unit's resources.

The underlying scenarios considered when implementing SG International Ltd's recovery solutions are:
- Partial loss/ Localised incident where the impact is limited (e.g. a floor of a building is inaccessible)
- Major local disaster impacting SG International Ltd only (such as the total loss of a single building in London)
- City wide incident (denial of access, destruction etc)
- Mass absenteeism

As a result of its Business Continuity Management programme, SG International Ltd has developed a comprehensive and flexible set of Business Continuity Management solutions supporting the Business Continuity Plans:
- Conservatory Measures
    - Transfer of activities to another overseas office
    - Restricted to activities mirrored (IT and skills) in other countries which can be undertaken very rapidly in case of a disruption
    - Our planning assumes that Conservatory Measures are available immediately after a disruption

- Business Recovery Site – Outside Greater London
    - SG International Ltd has dedicated positions in a third party provided facility located 25 km from the production building
    - Positions are generically configured to be used by any user thereby maximising their utilisation
    - Our planning assumes that the Business Recovery site is available within 1-2 hours

- Cross Border arrangements
    - Relocation to another SG building in another location, primarily Paris
    - Our planning assumes that cross border arrangements are available within 2 days after a disruption

- Remote Working
    - Remote access solution allowing staff to access bank systems using either bank equipment or their own IT equipment
    - Current infrastructure can support up to 12,000 concurrent users
    - Our planning assumes remote working is available at any time, as long as the IT infrastructure is still operating

6.   TESTING REGIME

In order to assess both the Crisis Management and BCM solutions, SG International Ltd has developed a full and robust testing programme that is monitored on an annual basis. GBIS is committed to undertaking both local and global testing and aims to ensure that:
- Various components and solutions are exercised regularly to demonstrate their efficiency and effectiveness
- All plans and solutions implemented are "fit for purpose"
- All staff, at all levels, are engaged in the business continuity lifecycle

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7. THIRD PARTY SERVICE CONTINUITY GOVERNANCE

SG has a clearly defined governance framework in place that covers both the onboarding of new service providers as well as the ongoing oversight of our most critical service providers.

New service providers

Potential service providers are subject to a pre-requisite assessment in order to better understand the nature and criticality of the service being provided and to determine whether it is 'essential'. Part of this assessment requires the Business Continuity Management team to perform an inherent risk analysis of the outsourcing to identify measures to mitigate any risks and ensure that these measures are implemented. This includes an analysis of the service provider's business continuity plans and testing regime to ensure they are robust, fit for purpose and satisfy SG that in the event of an incident, the service provider would be able to continue to provide an appropriate service.

If the business continuity planning arrangements are not deemed sufficiently robust, SG will either request additional information or ask for remedial action to be taken, with evidence of its completion to be provided prior to contract finalisation.

Ongoing due diligence for critical service providers

SG's outsourced service oversight framework stipulates that each service for SG must have a dedicated internal manager who is responsible for the oversight, monitoring and control of the service provider's business continuity planning, amongst other topics. This manager must regularly review and provide an overview of the service's risk profile for management oversight.

Furthermore, as part of our oversight of critical service providers' business continuity arrangements, there is a standard BCP questionnaire that broadly covers business continuity planning, crisis management framework, business recovery sites and back-up data centres, testing and pandemic planning. The questionnaire is issued on an annual basis with response analysis and appropriate follow-up undertaken by the Business Continuity Management team.