Business Continuity Policy

MASORANGE Group

(This document has been translated from the current valid Spanish version for informational purposes only. If in doubt, please refer to the Spanish version)

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Mailing List

- MasOrange Business Continuity Stakeholders

Version Control

Version	Date of approval	Change from the last version
1	19/04/2017	*Initial version of the Orange document.*
2	09/05/2017	*Changes after internal audit held in April 2017, where it was requested to complete the policy with the principle of satisfying the interests and requirements of the interested parties.*
3	19/12/2018	*Extension of section 1.2 Applicability.*
4	28/01/2019	*Inclusion of television in the scope phrase of Annex 1.*
5	16/11/2020	*Update signs new CEO*
6	23/08/2023	*Policy Overview* *Responsible Update* *Update and signing new CEO*
7	19/07/2024	*Adaptation of the Policy to MASORANGE* *CEO Approval*

Executive Summary

The main objective pursued by MASORANGE's Business Continuity Management System (hereinafter BCMS) is to safeguard the processes and services offered to our customers, ensuring the continuity of business activities in the event of incidents or disasters of significant magnitude.

To this end, and as part of its commitment to Business Continuity, MASORANGE's management establishes and acquires the following principles and commitments:

- Provide the necessary resources to maintain the system and ensure the continuity of MASORANGE's business and its critical processes.
- Ensure the identification of potential threats that may jeopardize MASORANGE's business continuity or trigger a crisis within the organization.
- Carry out a risk analysis evaluating the impacts and business objectives for prevention and the definition of their recovery levels, prioritizing the continuity of critical activities.
- Improve the resilience and resilience of the company by providing the relevant measures to respond effectively to the materialization of scenarios with sufficiently significant impacts.
- Preserve the interests of the system's stakeholders, as well as reputation, brand, and value-creating activities.
- Satisfy and enforce all the necessary requirements for the correct performance of the system, improving the company's BCMS continuously and proactively.
- Verify the periodic performance of tests to ensure the effectiveness of the defined recovery plans.
- Ensure the rapid response of all the mechanisms present in the BCMS aimed at mitigating the risks identified within the system.
- Implement the necessary mechanisms to respond to crises, safeguard the health and safety of people and ensure the return to operation of essential business processes in the shortest possible time and with minimal disruption.

MASORANGE's Management leads and supports the BCMS, promoting the definition of objectives for continuous improvement of the NCMS. It also ensures compliance with this Policy in the organization, thus ensuring effective business continuity performance.

Madrid, 19 July 2024

Meinrad Spenger
CEO

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1. Introduction

1.1. Purpose

This document describes and formalises the position and main guidelines of MASORANGE's Business Continuity Management System (hereinafter BCMS), establishing a Business Continuity Policy aligned with the corporate context and appropriate to the organisation's purpose. This policy serves as a framework of reference for the BCMS itself, acting as a guide for the definition of applicable objectives and requirements.

The policy contributes to MASORANGE's mission to offer its customers services with an adequate level of availability and meet service level expectations, promoting the rapid and effective recovery of the company's essential operations in the face of any disaster that puts the continuity of operations at risk, in accordance with the entity's business requirements. applicable laws and regulations.

1.2. Scope

This policy applies to the following areas of MASORANGE:

- MASORANGE employees, especially those with a role and mission assigned within the BCMS

- Critical service providers impacting MASORANGE's supply chain

- The critical processes that support MASORANGE's services and that are included in the scope

- The technology and systems essential to ensure the continuity of critical processes and;

- The infrastructures included in the scope of the system that allow the operation of the company's systems and networks.

2. Strategy

The implementation and maintenance of a BCMS responds to the corporate objective of ensuring the maximum availability and quality of our services, and is a consequence of MASORANGE's purpose and vision:

Nuestro Propósito
(Re)conectar a las personas poniendo la tecnología al servicio de la mejor experiencia de cliente.

Nuestra Visión
Ser líderes en satisfacción de cliente, talento e impacto positivo.

The business continuity processes included in the BCMS allow for an effective and efficient response to potential relevant incidents and disasters which, in the absence of such management processes, could have a major impact on the achievement of MASORANGE's objectives in the short and long term.

The main benefits that the BCMS brings to MASORANGE's strategy are the following:

- Improve the company's operations, promoting risk reduction, downtime reduction and improved competitiveness,
- To ensure the satisfaction of the needs and interests of MASORANGE's customers, company staff and other relevant stakeholders,
- Protect the material assets and know-how of the business,
- Improve security and;
- To preserve MASORANGE's image and reputation.

3. Principles for Business Continuity

The following principles are established for the Business Continuity Management system:

1. **The Business Continuity Management System** develops the processes that allow the implementation, operation, monitoring, review, maintenance and improvement of Business Continuity in the organization.
2. **MASORANGE's Management**, as well as those responsible for the processes, ensure compliance with the Business Continuity Management Policy.
3. **MASORANGE's Management uses the necessary resources** for the BCMS to fulfil its purpose, with an approach based on the identification, assessment and management of risks.
4. **Training and awareness-raising actions are carried out** with the personnel involved in the system to ensure their adequate performance of the processes and a rapid response to incidents.
5. **The necessary tests of** the business continuity plans are carried out to ensure the correct operability of the BCM.
6. **Business continuity processes are continuously improved** to ensure incremental and sustained assurance over time.
7. **The satisfaction of the interests and requirements of the stakeholders is taken into account** to ensure that the system meets the identified needs of each interested party.

To carry out all of the above, MASORANGE's Business Continuity is implemented through the following general processes of the BCMS:

- **Risk analysis, control and treatment.** Develops the study and assessment of risks that may jeopardize business continuity. Likewise, the necessary measures will be applied to mitigate these risks based on their criticality.

- **Business Impact Analysis (BIA).** Quantifies the severity of the disruption of MASORANGE processes within the scope of the system.

- **Recovery strategies.** They make it possible to restore the company's critical processes and services in acceptable times.

- **Continuity and crisis management plans.** Describe and manage the operations and communications necessary to restore the company's activities.

- **Training and awareness.** Ensuring that the necessary knowledge is imparted and staff are adequately aware of their responsibilities and roles in MASORANGE's business continuity.

- **Test management.** It allows the company to be prepared to respond to the occurrence of real incidents.

- **Continuous monitoring and improvement.** Ensures the effectiveness and control of the system in a proactive and objective manner by incorporating indicators and conducting BCM audits.

4. Objectives of the SGCN

MASORANGE assumes the following global objectives of the Business Continuity Management System, to respond to the mission of protecting the continuity of services:

- **To guarantee an adequate level of service** in terms of availability in the processes and services provided by MASORANGE

- **To ensure efficient compliance with the legal obligations** applicable to MASORANGE

- **Develop business continuity plans**, which align with the changing needs of the company, proving their effectiveness through annual tests and audits, thus improving resource planning to ensure business continuity

- **Incorporate best practices** in actions to meet systematically, continuously and efficiently, the above continuity objectives in the face of internal and external changes.

5. Organization and communication

5.1. Organization and responsibilities

In order to successfully achieve the Business Continuity objectives, MASORANGE establishes a governance and management structure to coordinate the implementation and operation of the BCMS:

- **Executive Committee of Crisis.** Trained by Senior Management, including the company's CEO, he is ultimately responsible for the continuity of MASORANGE's operations and services. He is in charge of declaring and managing the Red Crises. As a representative of the Executive Committee, the CEO signs and ratifies the Continuity Policy.

- **Crisis Committee.** Formed by MASORANGE Management bodies to identify and ensure the risks and obligations related to Business Continuity, in order to ensure the correct implementation of the measures defined to protect the availability of the service and ensure the correct implementation of continuity plans. Yellow Crisis management.

- **Crisis Management Team.** Key Continuity interlocutors, responsible for the management of the Continuity Plan in their business area.

- **Responsible for plans and tasks.** Personnel with specific functions within a continuity plan or procedure.

The implementation, operation and maintenance of the BCMS is the responsibility of the BCM team, led by MASORANGE's Chief Security Officer (CSO).

The detailed set of responsibilities and roles of staff are specified within the BCMS documentary framework. Responsibilities are communicated and made explicit, and employees are provided with the necessary training and awareness to carry them out.

5.2. Communication

The Crisis Committee promotes the validity, publication and distribution of the Business Continuity Policy to all its employees, as well as to third parties interested in MASORANGE's Business Continuity.

As part of the BCMS, the necessary documentary framework is developed to extend and operationalize this Policy in all aspects of Business Continuity.

6. Third parties

Given the relevance of the supply chain in the continuity of MASORANGE's services and operations, suppliers that provide critical services will be participants in this Policy and in MASORANGE's other Business Continuity and crisis management procedures.

7. Applicable legislation

Compliance with the legislation that is applicable to Business Continuity is considered essential at MASORANGE. Therefore, the list of applicable legal and regulatory requirements is identified and kept up to date, analyzing the scope of application and planning the corresponding actions for their due compliance.

This list is detailed in the register of applicable legislation of the SGCN.

8. Compliance

Compliance with this Policy is mandatory for all employees, collaborators and service providers of the company within the specified scope.

Any violation of the policies may result in contractual claims and/or termination of contracts with contractors or third parties, as well as contractual claims and/or disciplinary measures for MASORANGE employees.

Any situation in which compliance with this policy is not possible will be considered an exception, and will be handled as such by the Security area, with a risk-based approach.

9. Policy Review

The Policy will be reviewed periodically within the PDCA cycle, and in any case whenever there are significant changes in the business, the scope or context of the Continuity Management System, the legislation and/or the risk landscape of MASORANGE.

The Crisis Committee will be in charge of ensuring the review and evaluation of the adjustment of the Policies defined to the requirements of MASORANGE, ensuring the existence of an updated policy focused on the objectives that the organization sets at all times.

10. References

10.1. Regulations and legislation

a) ISO/IEC 22301: The security of society – Business Continuity Management System – Requirements.

b) ISO/IEC 27001: Information Security Management System

c) Law 8/2011, of 28 April, which establishes measures for the protection of critical infrastructures.

10.2. Guides

a) ISO 22313: Societal security - Business continuity management systems – Guidance

b) ISO/IEC 27031: Guidelines for the preparation of information and communication technologies for business continuity.