

Business Continuity Policy - M Group

Contents

Issue, Review and Amendment

Introduction

Scope

Business Continuity Management

Business Continuity Management Review Committee

Roles and Responsibilities

BCMS Objectives

Exercise and Testing

Reporting

Related Policies, Codes and Procedures

Issue, Review and Amendment

The Head of Risk and Business Continuity should review this Policy at least once a year to re-affirm its conformity to the current requirements of the Group Policy Statement or immediately if its contents are deemed to be no longer valid.

Where revisions are required, they should be made within the document and should be summarised within the version history by way of an amended revision number and the date of the revision to identify each revised document.

This Policy will be published on Riskconnect Business Continuity & Resilience and issued to relevant employees within M Group.

Introduction

This policy is designed to cover all companies / sites within M Group.

The aim is to take reasonable steps to ensure continuity and regularity in our performance by identifying and managing the material risks, minimising business disruptions and limiting potential losses to unforeseen interruption.

The purpose of this Policy is to assist management in achieving the following objectives in the event of a business disruption:

- Provide for the safety of staff and the security of the facilities;
- Maintain critical operations at a pre-established level;
- Meet client expectations;
- Meet regulatory expectations for business risk management;

- Protect the business and our reputation; and
- Minimise the financial consequences of a significant event.

In particular the aim of the Business Continuity Policy is to ensure, in the case of an interruption to systems and procedures, the preservation of essential data and functions and the maintenance of activities or, where that is not possible, the timely recovery of such data and functions and the timely resumption of activities. The timing and priorities of the recoveries and the responsibilities are listed in each Site Business Continuity Plan.

This Policy is supported by a Business Continuity Plan for each critical site / contract. These plans provide more detailed information on the subjects contained within this Policy.

Scope

This policy applies to all companies and sites within M Group and critical sites are either certified to or align to the ISO 22301 standard.

Business Continuity Management

M Group employees will adhere to the M Group Business Continuity Management System (BCMS) set out in the MGS Group Business Continuity Procedure (MGS-BCM-001-P01).

Business Continuity Management Review Committee

Whilst overseeing and monitoring business continuity activity is the responsibility of the Group Risk Board, the Business Continuity Management Review Committee has operational responsibility. There is one BC Management Review Committee for the ISO 22301 certified sites and one for the non-certified critical sites and are to be made up of the below:

- Chaired by Head of Risk and Business Continuity.
- Attended by divisional BC Champions.
- Requires a quorum of three: with at least one from each division; and one from Group present.
- Meets twice a year.

Roles and Responsibilities

The Business Continuity roles and responsibilities are detailed below and are referenced in more detail in the Group Business Continuity Procedures.

The Head of Risk and Business Continuity and the Group Business Continuity Manager, supported by the Divisional Business Continuity Champions have primary responsibility for implementing this policy and monitoring its effectiveness. Additionally, each business must provide suitable and sufficient resource to manage the business continuity process at their respective sites/departments.

Role	Key activity in the business continuity planning
Chief Financial Officer	As Programme Manager, has overall accountability for Business Continuity for M Group. Responsible for Group Crisis Management Policy and Group BCMS review and approval.
Head of Risk and Business Continuity	Is responsible for the day-to-day operation of the Business Continuity Planning Programme including the development and implementation of Business Continuity practices, procedures and standards. Responsible for assessing the BC requirement of each site / business and, with agreement of Divisional MD, determine extent of BC planning.
Business Continuity Manager	Supports the Head of Risk and Business Continuity to ensure delivery of the BCMS Programme.
Business Continuity Champion	Responsible for Business Continuity Planning and compliance with the ISO 22301 standard for his/her division.
Business Continuity Plan Owner / IMT Leader	Responsible for managing the day-to-day operations of the business continuity process at their respective site/department. Responsible for BCP approval and for implementing the plan.
Business Continuity Coordinator	Responsible for supporting the work of the BCP Owner.

BCMS Objectives

This section describes M Group's Business Continuity Management System (BCMS) Objectives at both Group and Site level. The approach to how we achieve these objectives is found in the Business Continuity Standard (MGS-BCM-001-S01).

The purpose of the BCMS Objectives is to ensure that M Group continues to meet the expectations and requirements of its clients and partners. The BCMS will seek to continuously improve the organisation's resilience and capacity to recover from any disruption to business.

It is applicable to all businesses and sites identified within the Group Business Continuity Standard (Scope of the BCMS) and all employees, suppliers and outsourcing partners who have a role in measuring against the objectives within the BCMS scope.

The below section outlines how M Group intends to monitor achievement of the BCMS objectives at Group level .It is the responsibility of the Group BC function to ensure these objectives are achieved:

BCMS Objective Category	Group Objective	Measurement
Governance	Hold regular meetings to discuss monitor and review business continuity progress with involvement of Senior Management and Executive Level.	The BCMS is an agenda item in the Group Risk Board quarterly meetings. Actions will be forwarded by this Board.
	Develop and maintain the Internal Audit and Test schedule	Current Internal Audit and Test schedule in place.
Risk Management	Understand business processes and identify critical activities that require additional risk treatment and recovery solutions.	Critical activities are identified in the BIA and shown under the Insights Reporting on Riskconnect BC&R
	Complete Threat Risk Assessment for each site and determine appropriate strategies	Business Continuity Risks are included in the BIA.
Continuity Confidence	Ensure Emergency Response Plans, Incident Management Plans and Business Continuity Plans are developed to cover a timely, appropriate response and recovery to any BC incident for sites within ISO22301 scope.	BC Status Report shows where plans are in existence and/or due a review.
	Provide continuity assurance over the performance of plans through a programme of exercise and testing, regular maintenance, internal audits, external audits, and other independent reviews.	BC Status Report shows where we are compliant and non-compliant.
	Review key service providers to obtain assurance on their BC capability for the services they provide to M Group.	Document % of supplier reviews conducted and those planned.

Training and Awareness	Sustain an internal training programme to generate a better understanding amongst our staff of the importance of preventative measures to safeguard our business in the event of a crisis.	IMT Competency Cloud training module % completion. General staff awareness online training module % completion. Annual in person training by Group.
	Regularly communicate to all IMTs and general staff.	Workshops and M Connect 'please read' documents.
Compliance	Set and monitor key objectives to effectively manage the Business Continuity Programme.	Review Group and Site BCMS Objectives at every Management Review or at least annually.
	Comply with ISO 22301 standard.	Externally audited annually.
Continual Improvement	Continually improve the Business Continuity Programme in line with industry best practice to increase the resilience of M Group to disruptive events.	Revised documentation templates and procedures. Log of incidents, lessons learned, Internal Audit Non-Conformities, tests.

This section outlines how M Group intends to monitor achievement of the BCMS objectives at Site level. It is the responsibility of the Divisional BC Champion and Site BCP Owner to ensure these objectives are achieved:

BCMS Objective Category	Site Objectives	Measurement
Governance	Hold regular meetings to discuss monitor and review business continuity progress.	Annual local IMT Meeting.
	Provide updates to Head of Risk and Business Continuity on ongoing	Annual Review.

	BC efforts.	
Risk Management	Review BIA and Risk Treatment Plans at least annually.	Business Continuity Risks are included in the BIA.
	Identify appropriate strategies for recovery of Functional Areas and Critical Activities.	Critical activities are identified in the BIA.
Continuity Confidence	Review Business Continuity Plans annually or when the business changes.	BC Status Report showing compliance/non-compliance.
	Carry out annual BCP testing.	Recovery Time Objectives (RTOs) confirmed as achievable. Testing report showing corrective actions.
Training and Awareness	Ensure all IMT Members for each Site BCP are competent to fulfil their roles.	Annual Training and Testing process documented.
	Ensure BC awareness throughout the site including new starters.	Document as part of Induction.
Compliance	Provide responsible BC Owner to ensure all BC requirements are met.	Nominate person.
Continual Improvement	Debriefing procedures after any test or real disruption with lessons learnt.	Debriefing Report.

Exercise and Testing

Each BCP must be tested at least annually to ensure processes and procedures related to BC are up to date and effective.

Each BC Plan Owner and Co-ordinator is responsible for creating and maintaining an appropriate exercise schedule, as well as documenting records of conducted tests and logs of results/actions taken.

In accordance with ISO 22301, exercises and tests should be:

- Consistent with the scope and objectives of the organisation.
- Based on appropriate scenarios that are well planned with clearly defined aims and objectives.

- Over time validate the whole of its business continuity arrangements.
- Minimised with regards to the risk of affecting operations.
- Concluded with formalised post-exercise reports.
- Conducted at planned intervals.

Reporting

The output of business continuity incidents, exercises and audits must be recorded, by BC Owners and are maintained and updated on the Riskconnect Business Continuity & Resilience system. Corrective actions and improvements to plans should be completed within 2 months from the date they were identified or based on an appropriate and agreed timescale depending on the associated risk. .

Related Policies, Codes and Procedures

M Group's Group Policy Statement: Business Continuity & Crisis Management

Group Business Continuity Standard (MGS-BCM-001-S01)

Group Business Continuity Procedure (MGS-BCM-001-P01)

History Log

Version	Date	User	Action	Change Summary	
V1	14 August, 2025	Victoria White	Approval	Approved by Victoria White	View PDF