

Global Business Continuity Management System

(BCMS) -Manual

Master List reference	Release date	Reviewed date	Next Review date
PL-BCMS-ENT-001	10/08/2026	10/08/2026	09/08/2027
Version	Process Owner	Reviewed by	Approved by
Ver 2.1	BCM Lead	ORBCM AD	ORBCM AVP

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Date	Version Number	Changes made
9/12/2022	Draft 1.0	Draft copy
27/01/2023	Ver. 1.1	Recommendation from Assessment 1 included
11/05/2023	Ver. 1.2	- Updated Section 2 - Made cosmetic changes in Section 2.3 - Updated the sequence of numbering of all sections in line with the ISO 22301 standards
12/05/2023	Ver. 1.3	- Updated 8.2e with the following information relating to - RTO's, RPO's, MAO's, MBO's
27/11/2023	Ver 1.4	- Updated Section 6.1's (c) under Section 6 and added (f) - Updated Section 6.2's (b) - Updated 7.1.2
12/01/2024	Ver 1.5	- Reviewed the document and updated the following - Section 2 and 2.3 to feature Hyderabad as certified - Section 5.2's e to feature the Policy link - Section 7.1.1 to feature Ops - Section 9.4 to include Governance
16/01/2024	Ver 1.6	Reviewed the document and aligned the bullets, updated full forms of Acronyms for RTO's RPO's and the like and formatted slightly
22/01/2024	Ver 1.7	Updated the current BCM's Approving authority
15/01/2025	Ver 1.8	- Updated the following as part of the Annual review - Sections 1 and 2.1
07/04/2025	Ver 1.9	Updated Sections 6.1 and 7.3 to show change in guard of RA from IRM to BCM
10/03/2026	Ver 2.0	- Agent BOT integration in CSD to aid in Crisis Ticket Management - Climate Risk Assessment(CRA) is integrated with the CWA as part of the Risk Assessment - Horizon Check included as part of pre-alerts to any brewing crisis across the Geos
10/08/2026	2.1	Updated Sections 8.2 f and 8.5 to show recovery timelines

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1. INTRODUCTION

Firstsource Solutions Limited, an RP-Sanjiv Goenka Group company, is a global intelligence partner for enterprises in healthcare, banking and financial services, communications, media and technology, and retail. With a operations across the US, UK, India, Philippines, Mexico, Romania, Turkey, Trinidad & Tobago, South Africa, and Australia, Firstsource combines twenty-five years of domain expertise with an agent-first delivery model to design, build and operate intelligence enterprise operations. Under its Intelligence That Operates model, Firstsource underwrites outcomes — not effort — turning deep domain intelligence into compounding operational advantage for the world's most regulated industries. Firstsource has adopted the ISO 22301:2019 standard as its Business continuity framework; the BCMS (Business Continuity Management System) shall be established and maintained accordingly.

2. SCOPE OF BUSINESS CONTINUITY MANAGEMENT SYSTEM

The entire BCMS shall apply to Firstsource's Hyderabad Centre and may include other offices as required by the business and clients. While the Hyderabad Centre is certified on ISO 22301:2019, the framework would be extended to all operating offices in a phased manner for consistency.

2.1 PERSONNEL

All Firstsource employees, contractors, vendors, subcontractors, and other relevant interested parties—including auditors, clients, and the Board—who support or are engaged in the Business Continuity Management System (BCMS) fall within the scope of the program. This includes personnel operating from any Firstsource global location as well as approved remote workforce members aligned to respective delivery centers.

2.2 INFRASTRUCTURE AND INFORMATION PROCESSING SYSTEMS

All Firstsource infrastructure, technologies, applications and other information processing systems that are required to deliver critical services to its customers.

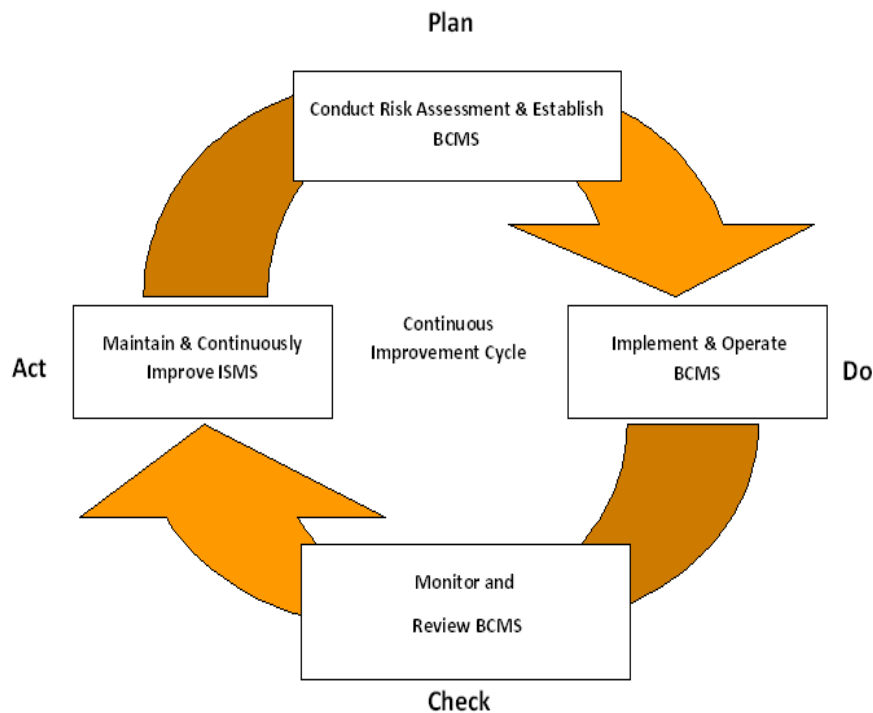
2.3 COMPLIANCE WITH THE POLICY, STANDARDS AND CERTIFICATION

The entire BCMS shall apply to Firstsource's Hyderabad Centre and may include other offices as required by the business and clients. While the Hyderabad Centre is certified on ISO 22301:2019, This strategy shall be fully integrated into all our clients' day to day operations and shall work in conjunction with other organizational policies and applicable regulations.

3. APPROACH TO BCMS

A process approach for establishing, implementing, operating, monitoring, reviewing, maintaining and improving the BCMS shall be adopted.

In order to achieve the aforesaid, the PDCA (plan-do-check-act) model shall be applied to structure all BCMS processes



4. CONTEXT TO THE ORGANIZATION

4.1 Understanding the organisation and its context

The external and internal issues that are relevant to the organization and that affects its ability to achieve the intended outcome(s) of its BCMS shall be determined, the current issues are as per Annexure C

4.2 Understanding the needs and expectations of interested parties

- a) The relevant interested parties and stakeholders shall be determined, the current list of interested parties and stakeholders are as per Annexure D
- b) The relevant legal, regulatory and statutory requirements relevant to the continuity of operations are documented; Firstsource has a dedicated legal and compliance team which identifies and documents these requirements. BCM team uses this repository to identify the requirements

4.3 Determining the scope of the business continuity management system

- a) The scope of the BCMS is as defined in section 2 of the BCMS manual (this document) and is also reflected in the BCMS Policy document BCMS-001
- b) The exclusions of BCMS along with its rational is defined in section 3 of the BCMS Policy document BCMS-001

4.4 Business continuity management system

BCMS shall be developed, implemented, maintained and monitored and reviewed for continuous improvement as per the PDCA methodology (section 3).

5. LEADERSHIP

Management commitment will be exemplified by publishing the Business Continuity Management Policy and by demonstrating the following ways:

5.1 Leadership and commitment

- a) Determine and provide resources to plan, implement, monitor, review and maintain BCMS
- b) Communicate the importance of meeting the Business continuity management objectives and the need for continual improvement,
- c) Regular cluster heads meet shall be setup to give impetus to BCMS
- d) Appoint a member of management responsible for the co-ordination and management of BCMS

5.2 Policy

- a) Business continuity policy and business continuity objectives shall be compatible with the strategic direction of the organization, refer to Business continuity policy BCMS-001
- b) Customer requirements are determined and shall be met with the aim of complying with the requirement (and improving customer satisfaction)
- c) Continual improvement shall be evidenced as part of BCMS
- d) Policy and objectives shall be communicated in various management forums {Cluster heads, Crisis Management Steering Committee (CMSC) members training etc}
- e) Policy shall be made available to all interested parties
(<https://www.firstsource.com/esg/governance/>)
- f) Conducting periodic reviews of the Business Continuity Management to ensure continuing suitability, adequacy, and effectiveness

5.3 Roles, responsibilities, and authorities

- a) Roles and responsibilities shall be established, refer to BCMS-001, Section 6
- b) BCMS shall be governed by cluster heads
- c) Global BCM Head shall be responsible for overall alignment of BCM objectives with companies' strategic direction

6. PLANNING

6.1 Actions to address risks and opportunities

- a) IRM teams Risk Management Policy adheres to ISO 27001, ISO 20000 requirements and follows the principles of ISO 31000 having a strong process in place on Confidentiality Integrity and Availability (CIA) hence BCM team to ensure all risks to business are covered
- b) Climate Risk Assessment (CRA) is integrated with the Centre wise Applicability and forms part of the Risk Assessment
- c) Outputs of Risk assessment conducted by BCM team (F-BCMS-ENT-029) shall be used as the base for facility risks (infrastructure and ICT)

- d) Single Point of failure's(SPoF's) that are identified for the Centre (Infrastructure and ICT including applications) would be taken into consideration when risk assessment at a process level are conducted
- e) Tracking the closure of SPoF's would be managed by BCM team in addition to check on the risks / SPoF's as and when a BCP document is reviewed or created
- f) BIA shall be conducted to identify process level risks, these shall ensure that Business continuity management system achieves its intended outcome(s)
- g) Disaster Recovery Plan to ensure continuity of services as covered in point {(c) above} shall be in place
- h) Prevent, or reduce, undesired effects through preventive actions; and
- i) Achieve continual improvement through Plan, Do, Check and Act(PDCA)

Firstsource shall plan:

- a) Actions to address the risks and opportunities
- b) Evaluating need for action to prevent occurrences of NC's
- c) Determining and implementing the preventive actions
- d) Evaluate the effectiveness of these actions:
- e) Follow-up actions from previous Cluster head meetings

6.2 Business continuity objectives and planning to achieve them

Operations Risk and Business Continuity Management (ORBCM) head shall provide Business continuity directives to achieve the Business continuity objectives. She/He would be the approving authority for all BCM efforts. The Business continuity objective shall demonstrate:

- a) That it is consistent with the Business continuity policy
- b) Measurable (if practicable);
 - All Centres shall be covered with a business continuity plan
 - Risks assessments are carried out by the BCM team
 - All Single Point of Failure for the Centre is made available
 - All possible risks that could disrupt the business are identified and documented
 - All business continuity plans are reviewed at least annually or when there are changes to the process
 - All disaster recovery plans are reviewed (by the respective ICT/Application/Software teams) at least annually or when there are changes to the process
- c) Objectives that shall be performed
- d) Updated as appropriate
- e) Resources that shall be required
- f) Identification of responsible stakeholder
- g) Take into account applicable Business continuity requirements
- h) Communicated through management meetings (Cluster heads)
- i) Timelines for the completion shall be determined and documented
- j) Method of evaluation for the intended results

6.3 Planning changes to the Business Continuity Management System(BCMS)

- a) Need for changes to BCMS shall be evaluated based on the changing BCM landscape or stakeholders requirements
- b) Purpose of change and potential consequences shall be evaluated and established
- c) Impact analysis shall be conducted to check the feasibility of the changes intended
- d) Changes would be implemented through Change Management Process (PR-ITSM-ENT-113) and the following criteria's shall be considered
 - The purpose of the changes and their potential consequences (Risks and opportunities)
 - Effect of change on the current process
 - Resource availability to address the change
 - Allocation of responsibilities and authority due to the change
 - Monitoring the effectiveness of changes made
 - Communicating with the relevant stakeholders prior to the implementation

7. SUPPORT

7.1 Resources

1. Global ORBCM head shall plan, budget, and make available adequate resources to implement and maintain BCMS
2. A global BCM team to manage all Business continuity requirements are in place

7.2 Competence

- a) Global ORBCM head shall ensure that BCM team has adequate training and experience to implement and maintain BCMS
- b) Additional trainings shall be provided to ensure that the team is abreast of the change in the global business continuity practices

7.3 Awareness

1. All staff who play a role in BCM shall be aware of the BCMS policy (BCM team, CMSC members etc)
2. CMSC members shall be trained before taking up the relevant role, thereafter annual refreshers shall be conducted
3. CMSC members shall be aware and play their respective roles during a crisis event and contribute to the learnings if any post the event.
4. All CMSC members shall be trained on their respective roles and responsibilities
5. Crisis notification
Firstsource staff across the globe are trained during the onboarding process, thereafter an annual refresher is conducted to ensure staff is well aware of the process of reporting a crisis. (GI-BCMS-ENT-040)
6. The effectiveness of the learnings shall be evidenced in the following areas
 - Successful completion of a crisis communication training test with 100% score
 - Successful response during the Tabletop tests
 - Successful implementation of the plan during the crisis
 - Successful implementation of the plan during a simulation exercise (if any)
7. Exercising / Testing the Plan

Firstsource shall ensure that adequate testing and exercising of the plan is performed at the predefined intervals and any learnings are updated into the relevant sections of the plan. The planning process shall focus on the required business objectives (e.g., restoring of specific communication services to customers in an acceptable amount of time)

7.1 Full scale test

7.1.1 Ops/ Facilities / Infrastructure related equipment

Ops and Facility teams shall identify all the critical equipment under their purview and test these equipment at least on annual basis. Ops and Facility team would be responsible to maintain these reports and share applicable records to BCM team

7.1.2 Technology / Telecom related equipment

Technology / telecom team shall identify critical equipment under their purview and test them for their functionality at least on annual basis and send a copy of the same to the BCM team. In case there is a requirement for a disaster recovery test based on business needs/client requirements, these shall also be tested at predefined intervals or at least on an annual basis.

7.1.3 Evacuation drills

Physical security team shall conduct evacuation drills (fire / tornado wherever applicable) at least on annual basis and send a copy of the same to BCM team.

The report / results for all the above tests shall be maintained in the format mentioned in F-BCMS-ENT-069. These documents will be retained as per document control procedure "PR-ISMS-ENT-001"

7.1.4 Tabletop test

Tabletop test shall be performed as per the procedure detailed in the BCP document

7.1.5 Call tree test

Call tree test shall be performed as per the procedure detailed in the BCP document

7.4 Communication during the Crisis

- a) All internal communications on a potential / ongoing crisis event shall be communicated to all stakeholders by the BCM team detailing the event and its perceived impact (if any)
- b) All client communications on a potential / ongoing crisis event shall be communicated by Client relations manager or the operations team
- c) Pre-alerts on a potential crisis event (if known) shall be communicated as per point (a) above and if deemed necessary by the client relation managers, would also be communicated to the client
- d) All communications shall be sent by email, CMSC members may be called if required
- e) For all client communications, corporate communications team would send the draft that would be updated with relevant details before being sent to the clients
- f) Frequency of updates shall be decided by the CMSC members collectively or the Centre head (CMO Leader) for the Centre that would be impacted

7.5 Documented information

- a) All necessary documentation to implement and maintain BCMS shall be made available and shall include the following:
 - i. BCMS policy -BCMS-001
 - ii. BCMS manual- PL-BCMS-ENT-001 (this document)
 - iii. BIA template -F-BCMS-ENT-151

- iv. Centre level business continuity plan (PR-BCMS-XXX-003), where XXX is the unique Centre code
- v. Client specific business continuity plan (PR-BCMS-XXX-004), where XXX is the unique client code
- vi. Business continuity test format (F-BCMS-XXX-069, where XXX stands for the Centre or client for whom the test is performed)

b) Creating and updating

All documents shall carry appropriate identification, description, owner, review date and shall be version controlled, these shall include the following at the minimum

- i. Master reference number
- ii. Owner
- iii. Review date
- iv. Issue date
- v. Approved by
- vi. Firstsource classification

c) Control of documents/documented information

- i. All BCMS documents shall be controlled to ensure that it is available to required staff for use when needed
- ii. A copy of the document shall be available with the CMSC members and at a centralised repository with ease of access to authorised staff
- iii. All documents shall be version controlled
- iv. Retention and disposal shall be based on Firstsource's document control procedure (external document PR-ISMS-ENT-001)

8. OPERATIONS

8.1 Operational planning and control

- a) Firstsource shall plan, implement and control the processes needed to meet Business continuity requirements, and to implement the actions determined in section 6.
- b) Firstsource shall ensure that controls and service levels defined in the 3rd party or outsourced service delivery agreements, are implemented, operated and met.
- c) All changes effected for maintaining and improving the third-party services, shall be managed by way of ensuring that approval from the process owner at Firstsource is sought, prior to implementing the change. The process owner shall ensure that the changes are appropriately timed to ensure minimum business disruption (if any)

8.2 Business impact analysis and risk assessment

- a) Firstsource shall ensure that a business analysis is done for all processes to arrive at continuity options which would meet the contractual/regulatory requirements
- b) BIA shall consider the various types of impact that would cause the objectives not being met, it shall also identify all activities that support the provision of the services, impact over time shall be considered
- c) Risk assessments shall be conducted at a process level ensuring that there are no single points of failure for continuity of operations in case of a disruption, BCM team shall use the risk assessment as the base for facility & Infrastructure risks(F-ISMS-ENT-029, external document)
- d) Risks identified (for business disruptions) if any, shall be treated or signoffs obtained from the business unit leads to run the operations with the known risks

- e) A standardised template (F-BCMS-ENT-151) would be used to conduct business impact analysis, all relevant Recovery Time Objectives(RTO's), Recovery Point Objectives(RPO's), Maximum Allowed Outage(MAO's), Minimum Business Continuity Objectives(MBCO's) shall be captured. An overview of the Information Technology Disaster Recovery(ITDR) plan(the actual process wise ITDR would be maintained by IT operations/SDM's) would also be captured here
- f) Firstsource's Business Impact Analysis establishes a 24-hour Recovery Time Objective (RTO), a 24-hour Recovery Point Objective (RPO), a 72-hour Maximum Allowed Outage(MAO) and a Minimum Business Continuity Objective (MBCO) of 20%.

8.3 Business continuity strategies and solutions

1. Business continuity strategies shall fulfil the following requirements
 - i. Contractual requirements with the client
 - ii. Meet the requirements to recover prioritised processes within agreed timelines
 - iii. Reduce the likelihood, shorten the impact, and limit the impact of if any
 - iv. Resources are identified and are available

2. Selection of strategies and solutions

Selection of strategies and solutions shall be as per the following section

- Agreement with the client along with the costs and benefits associated with it
- Meet the requirements to recover prioritised processes within the agreed timeframes

Firstsource understands that client's need for business continuity is heterogeneous and hence adopts a basic three level approach towards its business continuity strategy. Firstsource's clients can choose any of these based on their continuity requirement. BCM team would not provide costs for any of these options, transition / CRM / pricing teams shall ensure that these costs are included as part of the business proposal.

- a. Standard / Centre Level BCP option

The standard / Centre level continuity solution shall include a Centre level continuity plan (PR-BCMS-XXX-003) which documents various risks/ threats (as per the RA) and the possible plan of action in situations such as medical emergencies, potential DoP threats (Bomb Threat, Fire, Floods/ Heavy rains, etc.). Any risk materializing and leading to DoP (Denial of Premises is defined as, the facility not available to perform business for an extended period) situation shall not be considered under this solution.

- b. Multicity BCP option

Over and above the standard solution, the client can also take advantage of Firstsource's global presence by dividing operations into appropriate proportions and deliver out of multi cities. This option helps mitigate DoP related threat at a particular centre, and ensure that not all of the operation is stopped due to a Centre being unavailable to function (ensuring inbuilt redundancy)

- c. Client-specific BCP option

As this solution would vary from client to client based on their requirement customized plans shall be created in consultation with the client/operations

- d. Work from home option

Working from home offers an inherent Business continuity (in case of DoP) since staff handling a client's work would be geographically spread across the country. This option can be considered where PII / ePHI / PCI / Regulatory / Compliance risks are low. A formal Risk Assessment needs to be conducted (by operations based on clients

requirements) before the same is implemented. This solution like the one above would vary from client to client based on their requirement hence plans are customized in consultation with the client

e. Third party Work Recovery Area option

We have strategic alliance with some partners who offer “Work Recovery Area” as service. These services enable the client to have a workstation with all the amenities to continue business if the primary site is not available. This solution is also based on client’s needs and the plans would be customized in consultation with the client

3. Resource requirements

The following resources shall be considered while creating a plan

- i. People (Operations, Administration, Physical security etc)
- ii. Work Recovery Area (Physical buildings, workstations etc)
- iii. All IT and non-IT equipment required
- iv. Information and communication technology (ICT) systems including applications/software
- v. Transportation and logistics
- vi. Stay and food suppliers

4. Implementation of the solution

Firstsource shall train the staff and test the plan before implementation. It shall review it at least on an annual basis thereafter

8.4 Business continuity plans and procedures

Firstsource shall create a continuity plan and procedure structure PR-BCMS-XXX-003 here, XXX is the code for the Centre and PR-BCMS-XXX-004 here, XXX is the code for the client for client specific solutions, the requirement for these two categories would be based on the contractual requirements, by default all processes would fall under the Centre level solution in either case, the following procedures shall be met:

- A. The primary response, which is the immediate steps that needs to be taken
- B. The secondary response, which is the next step after the primary steps are completed

In addition to the above, based on clients continuity requirements, we would also setup other options such as;

a. Multi-city

Over and above the standard solution, the client can also take advantage of Firstsource's global presence by dividing operations into appropriate proportions and deliver out of multi cities. This option helps mitigate DoP related threat at a particular centre, and ensure that not all of the operation is stopped due to a Centre being unavailable to function (ensuring inbuilt redundancy).

b. Work from home as business continuity solution

Working from home offers an inherent Business continuity (in case of DoP) since staff handling a client's work would be geographically spread across the county. This option can be considered where PII / ePHI / PCI / Regulatory / Compliance risks are low. This solution like the one above would vary from client to client based on their requirement hence plans are customized in consultation with the client / CRM /Operations

c. Third party Work Recovery Area for business continuity solution

We have strategic alliance with some partners who offer "Work Recovery Area" as service. These services enable the client to have workstations with all the amenities to continue business if the primary site is not available. This solution is also based on client's needs and the plans would be customized in consultation with the client.

Note: While the plan is documented for the relevant scenario, the actual plan would be based on the decision made by the Crisis management team basis the internal and external prevalent conditions.

1. Response structure

Firstsource shall have a crisis management team called the Crisis Management Steering Committee (CMSC) comprising of staff in primary and secondary roles from various critical functions, refer to Annexure E for the same. Who shall be collectively responsible to manage the situation with the following outcomes. Reporting of the crisis shall be covered as part of the business continuity plan.

- i. Assess the nature, extend of disruption and its potential impact
- ii. Assess the impact on recovery objectives
- iii. Provide support to the crisis leader to invoke BCP
- iv. Put into action the components of the plan
- v. Relook at the priorities (example: safety of the employees)
- vi. Once invoked, set the communication plan in motion

2. Warning and communication

The following shall be the communication plan as part of FirstHorizon initiative and Agent BOT integration in CSD is set up to aid in Crisis Ticket Management

Internal and Interested parties

BCM team shall communicate the details of the potential crisis if the details are obtained beforehand, they would also send out updates and minutes of the crisis calls held prior, during and post

External:

All client communication shall be done by client relations manager or the relevant operations lead for the process in question. The discretion of when they need to be communicated would be that of the client relation manager or Operations based on the requirements from the client

Media:

All communications to the Media shall be done only by the corporate communications team

3. Business continuity plans

Business continuity plans shall be built to enable the following

- i. Provide guidance and information to assist teams to respond to a disruption and to assist operations with response and recovery
- ii. Recover / continue operations within the specified timeframes
- iii. The steps that need to be taken to recover the process
- iv. Process and procedures to meet the MBCO's
- v. Output of BIA's shall be used to create the business continuity plans

4. Recovery

All return to normal process and procedures shall be captured

8.5 Staggered Recovery Strategy

Firstsource recommends a phased Business Continuity Plan (BCP) tailored to the Client requirements during any potential Denial of Premise events (e.g., power outages, ISP failures, hardware issues). This strategy implements a staggered ramp-up to systematically restore operations, balance critical deliverables, and achieve 100% Business As Usual (BAU) within 72 hours.

- i. Phase 1: Immediate Critical Response (0 – 24 Hours)
Recovery Time Objective (RTO): 24 Hours.
Minimum Business Continuity Objective (MBCO): 20% operational capacity.
Focus: Immediate restoration of core, high-priority channels and critical compliance queues.
Action: Activate the primary skeleton critical staff using verified redundant network connections.
- ii. Phase 2: Tactical Operational Scale (24 – 48 Hours)
Recovery Time Objective (RTO): 48 Hours.
Minimum Business Continuity Objective (MBCO): 50% operational capacity.
Focus: Stabilizing secondary workflows and reducing initial backlog accumulation.
Action: Deploy the second tier of critical staff and initiate secondary routing protocols.
- iii. Phase 3: Full BAU Restoration (48 – 72 Hours)
Recovery Time Objective (RTO): 72 Hours.
Operational Capacity: 100% (Full BAU).
Focus: Complete restoration of all standard operational queues and stabilization of performance metrics.
Action: Mobilize all remaining critical staff and resume standard business-as-usual monitoring.

8.6 Exercise programme

The following components of the testing and exercising shall be implemented

- i. That the goals and objectives of the plan are achieved
- ii. Appropriate scenarios are used
- iii. Ensure that there is group analysis of the given scenarios
- iv. Ensure that there is consensus of the action that needs to be taken
- v. Check the confidence of the team members in implementing the plan
- vi. A test report is created and actions if any are closed within the timeframes agreed
- vii. Reviewed with promoting continual improvement
- viii. Are conducted at planned intervals or when there is a significant change in the environment

8.7 Evaluation of business continuity documentation and capabilities

Firstsource shall

- i. Evaluate the suitability, adequacy and effectiveness of its business impact analysis, risk assessment, strategies, solutions, plans and procedures
- ii. Undertake evaluations through reviews, analysis, exercises, tests, post-incident reports and performance evaluations
- iii. Conduct evaluations of the business continuity capabilities of relevant partners and suppliers;
- iv. Evaluate compliance with applicable legal and regulatory requirements, industry best practices, and conformity with its own business continuity policy and objectives;
- v. Update documentation and procedures in a timely manner.

These evaluations shall be conducted at planned intervals, after an incident or activation, and when significant changes occur. The following tests would be conducted

9. PERFORMANCE EVALUATION

1. Monitoring, measurement, analysis and evaluation

Firstsource shall determine the following;

- i. What needs to be monitored and measured
- ii. The methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results
- iii. When and by whom the monitoring and measuring shall be performed
- iv. When and by whom the results from monitoring and measurement shall be analysed and evaluated
- v. Firstsource shall retain appropriate documented information as evidence of the results
- vi. Firstsource shall evaluate the BCMS performance and the effectiveness of the BCMS

2. Internal Audit

Internal audit shall conform to the following

- i. The requirements of BCMS
- ii. The requirements of this document
- iii. Check if it is effectively implemented and maintained

Internal audits shall be conducted.

3. Management review

Management reviews shall be conducted by ORBCM head / designate at least on an annual basis

The review shall consider the following;

- i. The status of actions from previous management reviews
- ii. Changes in external and internal issues that are relevant to the BCMS
- iii. Audit results
- iv. Feedback from interested parties
- v. The need for changes to the BCMS, including the policy and objectives
- vi. Procedures and resources that could be used in the organization to improve the BCMS' performance and effectiveness
- vii. Information from the business impact analysis and risk assessment
- viii. Output from the evaluation of business continuity documentation and capabilities
- ix. Risks or issues not adequately addressed in any previous risk assessment
- x. Lessons learned and actions arising from near-misses and disruptions
- xi. Opportunities for continual improvement

The management review outputs shall be incorporated into BCMS and documented

4. Governance

All BC and IT DR Plans will be developed, reviewed and tested in accordance with the client contractual requirements at least on an annual basis.

The BC and IT DR Plans for newly transitioned processes within 90 days of the process going live or in accordance with the Client contractual terms(whichever is earlier).

Any exceptions to this process will require justification and approval by the Operations Lead and the same will be communicated to the Operations Head.

Exceptions	Escalation Level 1	Escalation Level 2
Creation of Standard/Client Specific Plan	BU Lead	BU Head
Delays/absence of DR site	BU/IT Lead	BU/IT Head
Testing(PhySec/Facilities/IT/BCM)	BU/Function Leads	BU/ Function Heads
Facilities Risk Assessments	IRM Lead	IRM Head
Others	BU Lead	BU Head

10. IMPROVEMENT

1. Nonconformity and corrective action

Firstsource shall determine opportunities for improvement and implement necessary actions to achieve the intended outcomes of its BCMS

When there is a non-conformity identified, it shall

- i. Take action to control and correct it
- ii. Deal with the consequences
- iii. Evaluate the need for action to eliminate the cause(s) of the nonconformity
- iv. It shall ensure that this is not repeated elsewhere by
- v. Reviewing the nonconformity
- vi. Determining the causes of the nonconformity
- vii. Determining if similar nonconformities exist, or can potentially occur
- viii. Implement any action needed
- ix. Review the effectiveness of any corrective action taken
- x. Make changes to the BCMS, if necessary

2. Continual improvement

Firstsource shall continually improve the suitability, adequacy and effectiveness of the BCMS, based on qualitative and quantitative measures.

To achieve the aforesaid, Firstsource shall consider the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities, relating to the business, or to the BCMS, that shall be addressed as part of continual improvement

3. Review of BCMS

Firstsource's BCM team, including top management has an established process to review the BC policy, objectives and BIA, BCMS as a whole is reviewed atleast on an annual basis to check if any new requirements to the standard needs to be incorporated.

Document maintenance / Review mechanism

Maintenance of the document is the most important aspect of the total program, hence, the document is reviewed periodically. Annual review is carried out and every revision / changes to the document and all the updates are recorded through version control

Firstsource shall continually improve the suitability and effectiveness of the BCMS based on the learnings from the tests and an actual event.

Firstsource shall ensure best practice is shared across the organisation and any acquisitions.

ANNEXURE A – INFORMATION CLASSIFICATION DETAILS

Classification: Firstsource Restricted
Information Owner (IO): ORBCM
Information Custodian (IC): BCM team
Authorization List (AL): All employees, Existing/Prospective Clients.
Declassify on: Never

ANNEXURE B - INTERNAL & EXTERNAL

Internal Issues:

- Structure of the organization
- Roles within the organization
- Availability of reliable qualified and competent work force
- Stability of work force
- Staff retention
- Impact of unionization
- Staff training levels
- Contractual arrangements with customers
- Payment terms from customers
- Solvency of customers
- Expansion of customer base
- Overall strength of business to support funding needs
- Opportunities to improve technology e.g. leasing of equipment
- Power consumption
- Data Centre capacity (physical and environmental)
- Resilience of infrastructure
- Relationship with investors
- Credit terms available
- Service level agreements with customers
- Culture within the organization

External Issues:

- Political, economic, social, technological, legal and regulatory
- Environmental e.g. power consumption, recycling or destruction of equipment etc.
- Overall economic performance in the country
- Economic plans for future
- The nature and impact of economy on hosting market
- Customer demographic
- General levels of consumer confidence
- Growth of outsourcing business
- Competitive environment – overall low cost of entry in to the market
- Customer expectation
- Standardization and certification within the industry
- Fuel prices - international pressures, domestic market pressures, government taxation regime, etc.
- Regulation within the industry generally
- Licensing requirements in respect of software
- Trade associations and lobbying powers
- Impact on the neighbours

ANNEXURE C

Interested parties and need & expectations of interested parties

#	Interested Parties	Needs & Expectations
1.	Employees	1. Secure & hygiene working environment; 2. Opportunity to grow within the organization; 3. Timely salary; 4. Adequate training to perform the required job.
2.	Clients / Customers	1. Security of information shared; 2. Abide by legal and regulatory requirement; 3. Abide by contractual obligations; 4. Accurate and timely service, as per the SLA; 5. Economical working.
3.	Shareholders / Board of Directors	1. Business growth & expansion; 2. Organization profit.
4.	Government agencies/ regulators	1. Maintain safe working conditions; 2. Co-operate with law enforcement agencies.
5.	Suppliers and partners	1. Agreement with service details; 2. Timely money for the service performed; 3. Support to the agreement and SLA.
6.	Emergency services (e.g., fire fighters, police, ambulance, etc.)	1. Co-operation during emergency situations or otherwise; 2. Openness in sharing required information.
7.	Employee families	1. Secure & hygiene working environment; 2. Opportunity to grow within the organization; 3. Timely salary;
8.	Media	1. Accurate and timely information; 2. Communication as per the organization policy.

ANNEXURE D

Sample CMSC structure:

