BUSINESS CONTINUITY PLANNING CHECKLIST - RECOMMENDATIONS

The following is a checklist of some key <u>recommendations</u> for Business Continuity Plans (BCP) for the members of the ABBL (for those who do not have a fully developed plan or who wish to have a benchmark).

This cheklist has been drafted and will be continuously updated through collaborative work with members of the ABBL Covid-19 Task Force.

This document provides key recommandations on planning activities, business issues to adress, measures to underpin continuity and responses to workplace risks in a pandemic.

Reference documents which were used to draw up these recommendations :
- Business Continuity Planning Checklist of preparatory actions in responding to an Influenza Outbrea, published by the Irish government (https://assets.gov.ie/68273/5dc40e1ac8ba4ac08087f5dc85144e38.pdf)
- CORONAVIRUS: CHECKLIST FOR FINANCIAL SERVICES FIRMS published by Clifford Chance (https://www.cliffordchance.com/content/dam/cliffordchance/client-portal/alerters/alerter-finance/2020/03/coronavirus-checklist-for-financial-services.pdf)

Please, note that interpretation and compliance with these recommendations is the sole responsibility of companies that apply them. This document is not designed to provide legal advice.

ID	Planning Activities
PA_1	Assign responsibility for planning and preparedness to a senior executive and a deputy
PA_2	Obtain information on pandemic influenza
PA_3	Consult within the company, with workers and worker representatives
PA_4	Consult with suppliers on measures they are taking and on potential disruptions to supply chains, what are the key contacts and channels for updates and other communication.
PA_5	Assess 'high level' impact on your business and attach appropriate priority to the planning process
PA_7	Develop a business continuity plan
PA_8	Identify any governance roles which must be filled
PA_9	Establish authorities, triggers and procedures for implementing plan
PA_12	Test the plan in exercises
PA_13	Share best practice with other businesses
PA_14	Revisit plan periodically

ID	Business Issues
BI_1	Identify critical activities and the employees and inputs required to maintain them
BI_2	Consider the possible impact of employee absences
BI_3	Consider the possible impact of disruption to the supply of inputs from suppliers in Ireland and overseas suppliers
BI_4	Examine the likely impact of a pandemic on your market and on your customers' requirements
BI_5	Identify and agree strategic imperatives
BI_6	Understand the business need for face-to-face meetings during a pandemic.
BI_7	Consider the potential for remote working.
BI_8	Identify any staff who may be working outside their normal jurisdiction and consider whether that may raise any licensing or tax concerns.
BI_9	Consider whether remote working or activating business continuity plans may require changes in the way that people comply with existing licensing requirements.
BI_10	Consider the resilience and security of remote working arrangements and whether this carries an increased risk of cybersecurity concerns.
BI_11	Consider whether there may need to be back-up to back-up arrangements, given the global impact.
BI_12	Review the relationship with recovery plans to identify where the outbreak could impair the ability to execute recovery/resolution plans, if triggered, or itself trigger activation of recovery plans.
BI_13	Consider data management policies and any additional processes which need to be put in place to keep certain information confidential
BI_14	Consider whether information about the impact of Coronavirus on the firm and its own plans may be inside information relating to the firm's listed securities, requiring announcement and information management.
BI_15	Establish authorities, triggers and procedures for implementing plan
BI_16	Consider the issues for business related travel during a pandemic
BI_17	Consider the issues for business related participation in conferences/events
BI_18	Consider the issues for business related organisation of conferences/events
BI_19	Consider the financial management implications of a pandemic
BI_20	Examine the extent to which others will be dependent on your business in the event of a pandemic
BI_21	Consider cyberattacks in this exceptional situation
BI_22	Consider how the outbreak may affect the ability to comply with contractual obligations under financial and other contracts
BI_23	Consider whether your can rely on force majeure clauses in contractual obligations to excuse non-performance
BI_24	Consider the circumstances under which you might decide to scale back or suspend operations during a pandemic

ID	Measures
M_1	Ensure ongoing review and record keeping of how the firm's business continuity and operational resilience plans are engaged in responding to the outbreak and identify any 'lessons learnt'.
M_2	Nominate deputies
M_3	Ensure that there is a list of deputies or others who could fill the role which must be filled in an emergency (e.g. chief compliance officer, money laundering reporting officer)
M_4	Cross-train, and identify alternative sources of labour
M_5	Communicate with staff in a manner appropriate to the current state of the pandemic alert
M_6	Prepare policies on quarantaine (trigger, conditions, closing)
M_7	Monitor and respond to announcements and guidance from regulators and health authorities.
M_8	Develop a communication strategy for keeping regulators appropriately updated, understand what emergency or forbearance powers they have and develop a list of areas where it may be necessary to seek forbearance.
M_9	Develop a client communication strategy to ensure that clients are kept appropriately updated, particularly if there may be delays or interruptions in service or closure of business premises.
M_10	Ensure that all employees understand remote working policies and limits on activities they can carry on remotely; keep internal contact lists updated and reporting lines under review.
M_11	Assess impact on financial position, collateral requirements, capital and liquidity.
M_12	Identify and manage exposures to clients who are particularly vulnerable to risks resulting from the outbreak.
M_13	Prepare measures for cyber attacks
M_14	Plan for increased take-up of employee welfare services
M_15	Prepare policies on sick leave and compassionate leave during a pandemic
M_16	Prepare policies on foreign travel during a pandemic
M_17	Plan for the needs of staff overseas
M_18	Make arrangements to assure supplies in the event of a pandemic
M_19	Consider the possibility of changes to your product, your service, or your interaction with customers, during a pandemic, and plan for any changes you consider appropriate
M_20	Review insurance coverage

ID	Responses to Workplace Risks in a Pandemic
R2R_1	Prepare policies on hygienic behaviour for employees and visitors to premises during a pandemic
R2R_2	Plan to provide for hand washing, hand hygiene, tissue disposal and other facilities
R2R_3	Plan for frequent and effective cleaning of the workplace
R2R_4	Prepare policies on attendance by employees who are infected, or are suspected to be infected, with influenza
R2R_5	Plan measures to reduce face-to-face contact with customers / suppliers and between employees from different sites
R2R_6	Identify work organisation measures that can be taken to reduce potential for employees who are in the workplace to infect each other
R2R_7	Prepare policies on flexible work locations (e.g. teleworking) and flexible working times (e.g. shiftworking)
R2R_8	Provide ICT infrastructure to support teleworking and remote customer interaction