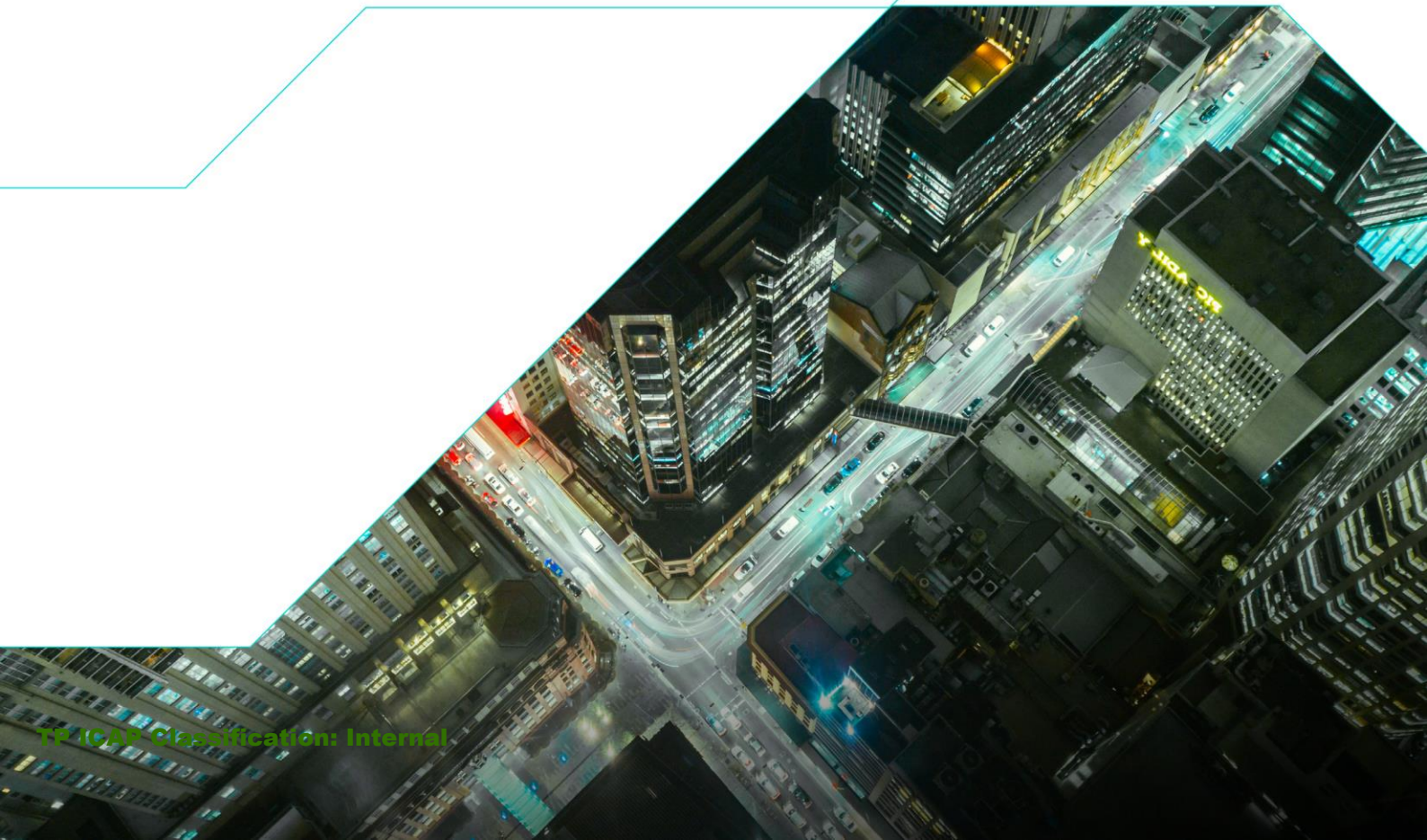




# Business Continuity Management (BCM) Programme

Executive Summary



# Contents

Business Continuity Management	3
Operational Resilience	4
Regulatory & Compliance	6
Continuous Improvement	6

# Business Continuity Management

## Purpose

Business Continuity Management (BCM) practices globally are governed by TP ICAP's BCM programme. The purpose of this document is to provide an overview of the BCM programme, including a summary of programme governance, policies, and Business Continuity and Disaster Recovery plans that will be used in the event of a business disruption. TP ICAP Senior Management are committed to the BCM programme.

This document may be shared with clients, stakeholders, auditors and regulatory agencies to provide an overview of TP ICAP's BCM programme.

## Business Continuity Management (BCM) Programme Objective

The objective of TP ICAP's BCM programme is to ensure the safety of staff, minimize the impact of a business disruption, provide effective crisis management, and allow for the continuation and recovery of critical systems and services.

## Policy & governance

BCM is embedded in TP ICAP's culture, and the TP ICAP Group is committed to maintaining processes and plans to enable critical functions to continue following a disruptive event. A formal governance structure exists with documented responsibilities, including regional management and executive oversight via risk committees.

TP ICAP maintains a BCM Policy and supporting procedures approved by senior management and reviewed at least on an annual basis.

## Crisis Management

TP ICAP's Crisis Management teams are organized on a global and regional level as follows:

Gold (Global, Strategic), Silver (Regional, Tactical), and Bronze (Local Office, Operational). TP ICAP Crisis Management is the initial response to a major disruption, designed to resolve any incident quickly without the need to relocate or reduce critical TP ICAP operations. TP ICAP has regional Silver Teams with detailed plans in the Americas, EMEA, and APAC to provide an effective and timely response to disruptive events of varying severity and type. The Crisis

Management teams undergo annual crisis management exercises as preparation for real-world emergencies.

TP ICAP has invested in an Emergency Notification System to facilitate timely, effective global alerts to TP ICAP staff during a disruptive event. A company spokesperson has been designated to the extent that external communications are required. The Emergency Notification System is tested regularly for integrity of data and staff awareness.

## Operational Resilience

TP ICAP is an enhanced scope Senior Managers & Certification Regime firm. As such will be meeting FCA Operational Resilience regime obligations in line with prescribed timelines from 31 Mar 2022. This work will involve: the identification of 'Important Business Services'; setting of 'impact tolerances'; asset mapping; and the use of severe but plausible scenarios to test Important Business Services' ability to recover from disruptions.

## Risk Analysis & Planning

### Business Impact Analysis (BIA)

Business Impact Analysis (BIA) update is a regular process to facilitate an understanding of the critical processes and resources required to continue business. Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs) are recorded to assess the criticality of systems and processes. BIAs gather recovery requirements, understand the impacts and risks in a business disruption, and collect information to develop effective recovery strategies. BIAs are refreshed annually or sooner following a major change to the organization.

### Business Continuity Plans (BCPs)

Business Continuity Plans (BCPs) are developed based on the recovery requirements from the BIAs and document recovery strategies to continue business and address operational and regulatory requirements. BCPs are updated annually, or as significant business changes occur and are based on corresponding BIAs and are owned by the business and approved by Senior Management.

## **Business Recovery**

TP ICAP invests in dedicated resources to protect the resilience and ensure continuity of critical business operations.

## **Alternate Facilities**

TP ICAP maintains dedicated Work Area Recovery sites (WARs) for critical staff to continue business operations if primary offices are unavailable or there is significant business disruption. WARs are equipped with required applications, network access, and telecommunication equipment, have power redundancy and are geographically dispersed from primary locations, operating on separate power and telecommunications grids.

In addition to WARs, authorised staff have remote access capabilities to allow them to work from home. In some instances, staff may be relocated to another office rather than working remotely or relocating to a WAR site.

## **IT Continuity (Disaster Recovery)**

TP ICAP maintains primary and secondary data centres to provide site resiliency for critical infrastructure and systems. Primary and secondary data centres have power redundancy with generator and Uninterrupted Power Supply capabilities, operating on separate power and telecommunications grids. High availability IT Continuity solutions are in place for critical production systems. Regular tests are conducted on an annual basis including data centre failover tests.

Regional Recovery Teams are responsible for maintaining and developing the recovery plans and capabilities to ensure the resilience levels for infrastructure, systems, and data meet business requirements.

## **Pandemic Planning**

TP ICAP maintains a Global Pandemic Plan to address the unique challenges of a disruption resulting from a pandemic. The plan is focused on ensuring the continued operations of critical business functions with decreasing staff numbers and is aligned with the phased alert system developed by the World Health Organization.

# Regulatory & Compliance

## Regulatory

TP ICAP's Business Continuity and Recovery plans are aligned to regulatory requirements of the jurisdictions in which the TP ICAP Group operates, including but not limited to the requirements of the Financial Industry Regulatory Agency, Financial Conduct Authority, Securities Exchange Commission, National Futures Association, Commodities Futures Trading Commission, and the Monetary Authority of Singapore. TP ICAP's BCM programme is periodically reviewed by regulatory authorities.

## Audit

Internal Audit reviews the Business Continuity Management and Recovery programme to ensure it complies with TP ICAP policies and regulatory requirements.

# Continuous Improvement

TP ICAP is committed to ongoing improvement of its Business Continuity and Recovery strategies. Through testing, exercising, auditing, and monitoring and assessing risks, the firm can maintain resilience and appropriately respond to emerging threats or disruptions.

## Testing & Exercising

BCPs are reviewed and validated by the BCM team and shared with critical staff. Business Continuity tests are conducted including Plan Desktop Walkthrough Exercises for crisis management to ensure teams understand their role during incident response and recovery, staff notification tests, and relocation of staff to the alternate recovery site for improved awareness and preparedness. Recovery tests are conducted annually to test recovery strategies and availability of critical IT systems and monitoring centres. TP ICAP also participates in annual industry testing.