

**GENERAL GUIDELINES FOR THE
BUSINESS CONTINUITY MANAGEMENT SYSTEM**



TABLE OF CONTENTS

1.	INTRODUCTION	3
2.	GOVERNANCE	3
3.	SCOPE	3
4.	VISION	3
5.	OBJECTIVES	4
6.	STRATEGIES.....	4
7.	METHODOLOGY.....	5
8.	TESTS AND EXERCISES	5
9.	TRAINING AND AWARENESS.....	5
10.	MEASURES AND EVALUATION.....	6
11.	CONTINUOUS IMPROVEMENT.....	6



1. INTRODUCTION

The need for DCV and its subsidiaries, hereinafter DCV, to operate uninterruptedly, guaranteeing business continuity, is inherent to the local and international financial market industry.

We understand business continuity as a company's ability to ensure operational continuity despite the occurrence of events that may affect their operation through the implementation of efficient responses for defined scenarios, which must be broad and diverse, to operate critical processes and services, resume operations at a minimum level in a set period until going back to regular operation.

2. GOVERNANCE

Within the governance objectives of DCV, there is a business continuity management system, known as BCMS, that the risk committee must be informed about and approve continuity management processes based on a systematized analysis of the issues and concepts that arise from the dynamism of the company, the stakeholders, and the environment. This committee comprises the upper management executives representing the management departments and the second lines of the organization.

Business continuity is the responsibility of the company's upper management, and the business continuity management system is the responsibility of the General Management represented by the business continuity and information security official, who is exclusively dedicated to their role, under the coordination of Risk Management.

3. SCOPE

The activities included in the business continuity management system allow DCV to fulfill the mission, goals, and obligations, both internal and external (including those related to stakeholders) of the organization, and also its legal and regulatory responsibilities. The activities that are not considered are those that, according to the business impact analysis (BIA), have a lower impact on business continuity and those that do not affect the operations that fulfill regulatory legal requirements and the demands established by the BCMS.

4. VISION

Continuity is a strategic axis defined by DCV to develop and provide its services and where commitments with the Securities Market are made, such as: "Being the last component of the financial system that stops operating and the first one to recover," regardless of the event.

It also states that the lives and physical integrity of the collaborators and the people in the company's facilities should be protected at all times during an adverse event, and also that of the collaborators that are providing services outside of its facilities.



5. OBJECTIVES

DCV aims for a high standard and develops its business continuity management by strengthening its governance, methodologies, and policies that help the organization implement mechanisms to maintain the availability of the services that, given any potential failures in their operation, have effective, imperceptible, and transparent measures in place for its stakeholders.

As part of the commitment that DCV has to the market, it makes efforts to comply with international best practices for mission-critical companies that are part of the financial market infrastructure, working under ISO 22301 standard on the BCMS.

The services that DCV provides to the market have a significant technology dependence level. The company does not focus its operation on supplementary activities but on implementing a "failure tolerant" infrastructure based on the concept of "technology redundancy."

6. STRATEGIES

Three steps were defined to address the demand for strengthening DCV's business continuity and dynamism. Prevention, containment, and recovery strategies.

- **Prevention strategies (probability).** The company has other processes available to prevent expected or unexpected impacts. It has risk management, capacity, incidents, events, and problem processes.
- **Containment strategies (impact).** DCV believes that all critical resources must be duplicated. Therefore all the key roles of collaborators have a backup, its facilities have alternative administrative offices for technology purposes, and all critical components are redundant in three data centers.
- **Recovery strategy (actions).** Its actions are based on the BIA, whose analysis determines the target times and the priorities of the services and critical activities, applying existing continuity plans and procedures or in addition to the crisis management plan.



7. METHODOLOGY

Throughout the years, DCV has applied a methodology to provide the organization with a transparent and precise response to the risks to which it is exposed.

Considering this, DCV's business continuity plan (BCP) is an essential tool. The BCP is a complete and self-sustainable definition of a set of pre-planned responses from the company to address events.

The methodology to create the BCP is based on the risk analysis (RA) results and the business impact analysis (BIA), for which responses have been defined based on their coverage (or effectiveness) and their efficiency for each scenario, which are part of a test and exercises program.

8. TESTS AND EXERCISES

The company regularly plans a testing and exercises program to train the organization in business continuity management, focusing on the measures and procedures implemented for containing, recovering, and resuming critical services and activities.

By running tests, documentation can be updated. The organization can operate and recover in case of an interruption, validate the collaborators' training processes, and continuously improve active responses through non-compliances management.

The BCMS testing and exercises program considers responses associated with the defined scenarios, which are executed according to an annual planning process in charge of the owners of the process, reaching a coverage agreed upon with the Administration. This process keeps the continuity plan updated, with ongoing feedback for the implemented responses and measures.

The measures implemented by DCV to achieve operational continuity consider the following:

- They tend to be imperceptible and as transparent as possible for the stakeholders.
- The resources or processes to apply to face incidents and their return to regular operation are as automated as possible.
- The procedures preserve the protection and security measures applied to the regular operating procedures.

9. TRAINING AND AWARENESS

In line with best practices, DCV has an annual training and awareness plan, which consists of analyzing the needs for training the staff that is part of the business continuity management system, based on their roles and responsibilities. The awareness process also takes place permanently through the available means of communication (screens, Intranet, short videos, speeches, others) to create and maintain a culture that promotes the importance of participative business continuity management in the organization and encourage the attitude required to develop and implement an effective management process in the entire company.



10. MEASURES AND EVALUATION

DCV is constantly evaluating its BCMS, due to which it conducts system performance evaluations and internal and external audits whose results are reported to the organization's stakeholders as appropriate.

11. CONTINUOUS IMPROVEMENT

As part of its commitments, the organization has included in the business continuity policy a continuous improvement of the system to strengthen its services and business processes through their availability as defined by the business impact analysis (BIA).

The information regarding the BCMS to be provided to the upper management and the Board can be found in Annex 1 of this document.

