



Business Continuity Policy

BUSINESS CONTINUITY MANAGEMENT SYSTEM

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Document Control Sheet

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Change Control

The contents of this document are subject to change control

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Business Continuity Policy	September 2025	Board of Directors	Head, Risk Management	Internal use only



Table of Contents

1. Executive Summary.....	4
1.1 Purpose	4
1.2 Scope.....	4
2. Business Continuity Policy	5
2.1 9PSB Business Continuity Policy Statement	5
2.2 Business Continuity Objectives.....	5
2.3 Commitment to Satisfying Applicable Requirements.....	5
2.4 Continual Improvement of the BCMS.....	6
2.5 Planning Changes to the BCMS.....	7
2.6 Approach to Managing Risk	8
2.7 Control of Documents and Records.....	8
3. Metrics and Key Performance Indicators	8
4. Approval.....	9

Document name:	Effective as of:	Approved by:	Owner:	Classification:
Business Continuity Policy	September 2025	Board of Directors	Head, Risk Management	Internal use only



1. Executive Summary

9 Payment Service Bank (“9PSB” or “the Bank”) recognizes the need to ensure that critical aspects of its business operates smoothly and with minimal interruption for the benefit of its customers, shareholders and other stakeholders. In order to provide such a level of continuous operation, 9PSB has implemented a Business Continuity Management System (BCMS) in line with the international standard for business continuity, ISO22301. The operation of this BCMS has many benefits for the business, including:

- Protection of revenue streams and company profitability
- Ensuring the supply of goods and services to customers
- Maintenance and enhancement of shareholder value
- Compliance with legal and regulatory requirements

The boundaries of the BCMS as implemented within 9PSB are defined within the document entitled *Business Continuity Context, Requirements and Scope*. It is recommended that this document should be reviewed in conjunction with this policy.

The Business Continuity policy also reflects the commitment of the Board and Management to drive value preservation through adequate risk management.

1.1 Purpose

The purpose of this Business Continuity policy is to define an overall policy with regard to Business Continuity that is appropriate for the purposes of the Bank and include:

- A framework for setting business continuity objectives.
- A commitment to satisfying applicable requirements.
- A commitment to continual improvement of the BCMS.

The bank’s Business Continuity Management entails identifying potential threats to the organization and the impacts to business operations those threats might cause and providing a framework for building organizational resilience with the capability of an effective response.

1.2 Scope

This policy applies to the entire Business Continuity Management System (BCMS) Scope.

Document name:	Effective as of:	Approved by:	Owner:	Classification:
Business Continuity Policy	September 2025	Board of Directors	Head, Risk Management	Internal use only



2. Business Continuity Policy

2.1 9PSB Business Continuity Policy Statement

“9PSB is committed to maintaining a Business Continuity Management System in accordance with the ISO 22301 standard, applicable laws and regulations, to support the continuity of its critical services and processes for all business units and functions. We continue to build organizational resilience with the capability to respond effectively and efficiently to business disruptions, maintaining a culture that fosters continual improvement.”

2.2 Business Continuity Objectives

The high-level objectives for Business Continuity within 9PSB are defined within the document *Business Continuity Context, Requirements and Scope*. These are fundamental to the nature of our business and are not subject to frequent change.

These overall objectives will be used as guidance in the setting of lower level, more short-term objectives for Business Continuity planning within an annual cycle. These objectives will be based upon a clear understanding of the overall business requirements and how they may change during the year.

Business continuity objectives will be documented in the *Business Continuity Management Plan* for the relevant financial year. Once approved, this plan will be reviewed on an annual basis as part of the management review process, at which time the objectives will also be reviewed to ensure that they remain valid. If amendments are required, these will be managed through the organizational change management process.

2.3 Commitment to Satisfying Applicable Requirements

Commitment to the delivery of business continuity extends to all levels of the organization and will be demonstrated through this Business Continuity Policy and the provision of appropriate resources to establish and develop the Business Continuity Management System.

Top management will also ensure that a systematic review of performance of the program is conducted on a regular basis to ensure that business continuity objectives are being met and business continuity issues are identified through the audit program and management processes. Management Reviews can take several forms including departmental and other management meetings.

Within the field of Business Continuity Management, there are a number of key roles that need to be undertaken to ensure the success of the BCMS and protect the business from risk.

Document name:	Effective as of:	Approved by:	Owner:	Classification:
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The Business Continuity Manager shall have overall authority and responsibility for the implementation and management of the Business Continuity Management System, specifically:

- The identification, documentation and fulfilment of applicable requirements.
- Assigning authorities and responsibilities for the implementation, management and improvement of BCM processes.
- Integration of business processes with the BCMS.
- Compliance with statutory, regulatory and contractual requirements in the management of assets used to deliver products and services.
- Reporting to top management on performance and improvement of the BCMS.

It is also the responsibility of the Business Continuity Manager to ensure that employees understand the roles they are required to fulfil and that they have appropriate skills and competence to do so.

9PSB will ensure that all employees involved in business continuity management are competent on the basis of appropriate education, training, skills and experience.

The skills required to ensure business continuity will be determined and reviewed on a regular basis together with an assessment of existing skill levels within 9PSB. Training needs will be identified, and a plan maintained to ensure that the necessary competencies are in place.

Training, education and other relevant records will be kept by the HR Department to document individual skill levels attained.

Full details of the responsibilities associated with each of the required roles and how they are allocated within 9PSB are given in a separate document titled *Roles, Responsibilities and Authorities*.

9PSB makes use of various third parties, in the delivery of products and services to its customers. Where this involves the operation of a business process, or a part of the process on behalf of 9PSB, it falls within the defined scope of the BCMS and is identified in the Business Continuity Management Plan.

In all cases, 9PSB will retain governance of the relevant BCM processes by demonstrating:

- Accountability for the process.
- Control of the definition of and interface to the process.
- Performance and compliance monitoring.
- Control over process improvements.

This will be evidenced by documents and records such as contracts, meeting minutes and performance reports.

2.4 Continual Improvement of the BCMS

9PSB's policy with regard to Continual Improvement of the BCMS is to:

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Business Continuity Policy	September 2025	Board of Directors	Head, Risk Management	Internal use only



- Continually improve the effectiveness of the Business Continuity Management System across all areas within scope.
- Enhance current processes to bring them into line with good practice as defined within ISO 22301.
- Achieve ISO 22301 certification and maintain it on an on-going basis.
- Increase the level of proactivity (and the business perception of proactivity) with regard to the on-going management of business continuity.
- Achieve an enhanced understanding of, and relationship with, the business units to which the BCMS applies.
- Review relevant metrics on an annual basis to assess whether it is appropriate to change them, based on collected historical data and feedback from relevant sources.
- Obtain ideas for improvement via regular review meetings with stakeholders and document them.
- Review ideas for continual improvement at regular management meetings in order to prioritise them and assess timescales and benefits.

Ideas for improvements may be obtained from any source including customers, suppliers, employees, risk assessments and audits. Once identified they will be documented and evaluated by the staff member responsible for continual improvement. As part of the evaluation of proposed improvements, the following criteria will be used:

- Risk.
- Cost.
- Business Benefit.
- Implementation timescale.
- Resource requirement.

If accepted, the improvement proposal will be prioritised in order to allow more effective planning.

2.5 Planning Changes to the BCMS

A need for change to the BCMS may arise from any number of sources, including the continual improvement process, events related to the internal and external context of the organization (such as internal re-organizations or mergers and acquisitions) or an increase or decrease in its scope.

Where changes arise, they must be carried out in a planned manner so that the required adjustments are approved and implemented in areas such as:

- Adjustment of the scope of the BCMS.
- Allocation of resources.
- Assignment of roles and their associated responsibilities and authorities
- Required competence levels.
- Communication of the purpose and nature of changes.
- Documented information required to support the change.

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2.6 Approach to Managing Risk

Risk management will take place at several levels within the Business Continuity Management System, including:

- Business continuity management planning – risks to the achievement of objectives
- Business continuity risk assessment
- Assessment of the risk of changes as part of the business change management process
- At the project level as part of the management of significant business changes

High level risk assessments will be reviewed on an annual basis, or upon significant change to the business environment. The *Risk Assessment and Treatment Process* document provides more detail on the approach to risk assessment.

Once in place, it is vital that regular reviews take place of how well business continuity management processes and procedures are being adhered to. This will happen at three levels:

- Structured regular management review of conformity to policies and procedures within 9PSB.
- Internal audit reviews against the ISO 22301 standard by the 9PSB Internal Audit Team
- External audit against the standard in order to gain and maintain certification to ISO22301

Details of how internal audits will be carried out can be found in the *Procedure for Internal Audits*.

2.7 Control of Documents and Records

All business continuity management policies and plans that form part of the BCMS must be documented. The way in which these documents are created and managed through their lifecycle is set out in *Procedure for the Control of Documented Information*.

All documents in the BCMS are uniquely numbered and the current versions are tracked – see document *BCMS Documentation Log*.

The keeping of records is a fundamental part of the Business Continuity Management System. Records are key information resources and represent evidence that processes are being carried out effectively.

The controls in place for managing records are also defined in the document *Procedure for the Control of Documented Information*.

3. Metrics and Key Performance Indicators

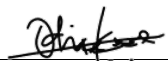
The following metrics and KPIs will be used to evaluate the effectiveness of this policy:

- Percentage of key business activities with recovery plans: 100%
- Percentage of recovery plans tested annually: 100%
- Exercise/test conducted: at least bi-annually.
- Percentage achievement of business continuity objectives: 80%, bi-annual.

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4. Approval

Name / Position	Signature
Osa Odiase CEO/MD	 09/10/2025