



Broadridge®

**Broadridge BPO
Business Continuity Plan Document for
Clients**

Table of Contents

1.	FIRM POLICY	3
2.	RECOVERY STRATEGY	3
3.	OPERATION LOCATIONS	4
4.	BCP STRUCTURE	4
5.	NOTIFICATIONS	6
5.1	CLIENT	6
5.2	INTERNAL NOTIFICATION	6
6.	PLANNING AND ONGOING READINESS	7
6.1	MISSION CRITICAL ACTIVITIES AND KEY RESOURCES	7
6.2	LIST OF CRITICAL FUNCTIONS	8
7.	MANAGED SERVICES PREPAREDNESS WHEN KEY APPLICATIONS ARE UNAVAILABLE	8
8.	KEY FAX NUMBERS	9
9.	BCP GROUP EMAIL ADDRESSES	9
10.	BCP SCENARIOS	10
11.	LOCATIONS	11
12.	KEY CONTACTS	13
12.1	CLIENT'S KEY CONTACTS	13
12.2	BROADRIDGE MANAGED SERVICES COUNTERPARTS FOR THE CLIENT	13
13.	QUARTERLY CALLING TREE DRILLS & EMERGENCY NOTIFICATIONS	14

1. FIRM POLICY

Broadridge Managed Services, has the below objectives in the event of a Significant Business Disruption (SBD)

- Safeguarding employees' lives and firm property
- Safeguarding customer assets
- Supporting our Outsourcing clients
- Comply with industry regulations
- Conducting a financial and operational assessment
- Quickly recovering and resuming operations,
- Protecting our client's books and records, and allowing the customers to transact required business.
- Ensure critical functions can be recovered within required guidelines.

Broadridge Managed Services plan anticipates on a broad level two kinds of SBD's - internal and external. In each instance, Broadridge Managed Services will exhibit readiness and preparedness to the situation.

- Internal SBD's affect only our firm's ability to communicate and do business, i.e. loss of primary facilities or data center, pandemic flu.
- External SBD's prevent the operation of the securities markets or a number of firms, such as a terrorist attack, pandemic flu, a city flood, or a wide-scale, regional disruption. Our response to an external SBD depends more heavily on other organizations and systems.

2. RECOVERY STRATEGY

We have several approaches which enable us to ensure our outsourcing customers have required recovery or continued service for mission critical activities which are outsourced to Broadridge Managed Services:

- We maintain multiple hot locations (Newark, Edgewood, Mount Laurel, Hyderabad, New Delhi and Bangalore) where work is performed and resources can be immediately shifted.
- We have an offshore operation which supports many of our core functions and is in operation 5 days/week for 24 hours/day.
- All of our US associates have the ability to work remotely.
- Our clients have established supervisory office capability with technical experts who can assume certain activities for a brief period of time. Additionally, our clients have middle-office operations and could provide temporary space for our staff that supports their business.

We have identified various possible business interruption scenarios and have established plans to ensure mission critical functions will be performed or recovered within a specified period of time based on client requirements. "Mission critical functions" are those that require prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. All such functions will be treated in a time sensitive manner, in compliance with regulatory and client requirements while mitigating market risk to both the firm and our clients.

These scenarios include but are not limited to:

- Loss of our facilities
- % of staff unable to get to work, i.e. pandemic flu
- System outage
- Industry or Exchange issues
- Non Industry disasters.

3. OPERATION LOCATIONS

Our operation mitigates the risk of losing a facility and certain other scenarios by maintaining multiple hot locations. “Mission critical functions” can be performed out of all locations to safeguard against interruptions.

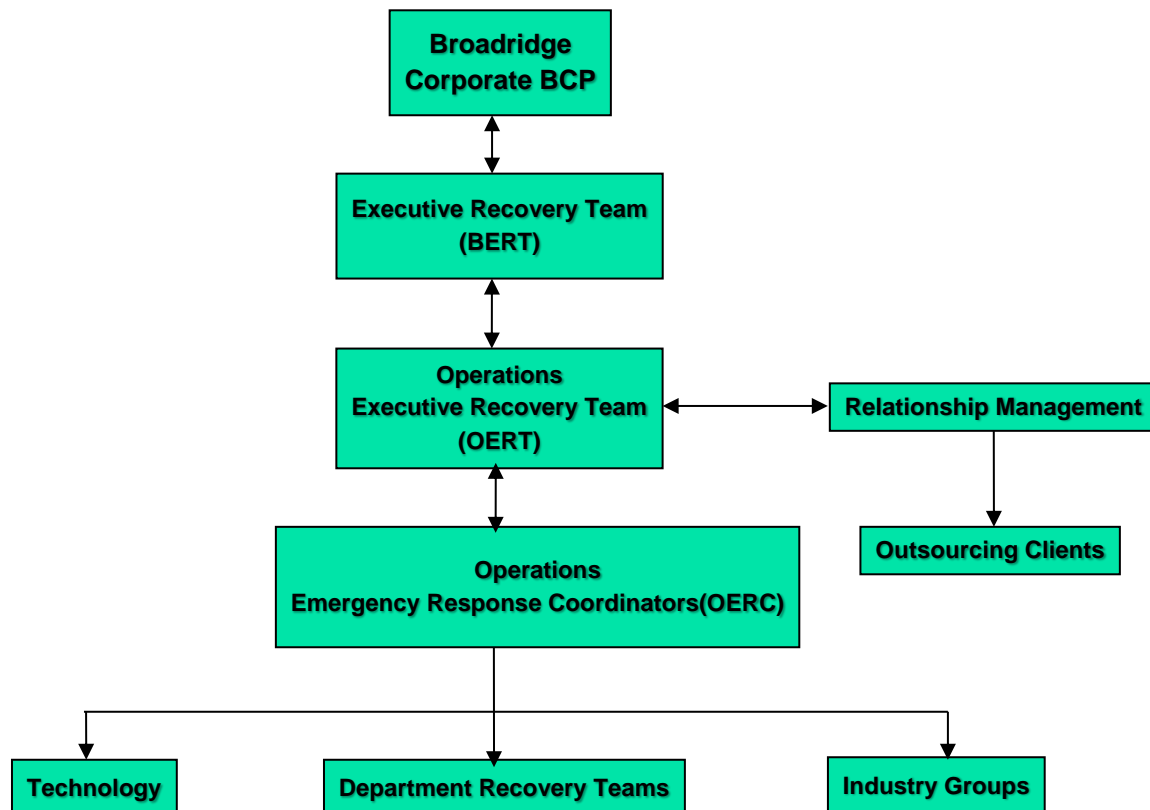
- Newark Location (Hot Site)
- Edgewood Location (Edge III) (Hot Site)
- Mount Laurel location (Hot Site)
- India Offshore (Hyderabad, New Delhi and Bangalore - Hot Sites)

Additionally, we have remote access for all US staff, ability to temporarily shift work within Broadridge Managed Services or other BR locations e.g. Edgewood I & II / Mount Laurel.

4. BCP STRUCTURE

We have established a formal governance, planning and escalation process designed to:

- Provide an organized and integrated response to an event
- Provide prompt and appropriate response to an event to reduce impact and mitigate risk
- Recover critical operation functions in a timely manner
- Ensure our plans are periodically reviewed and tested
- Ensure organization is continually improving and responds to environment changes
- Communicate effectively with our associates, clients and other key stakeholders



Broadridge Managed Services Executive Recovery Team (BERT) Firm-wide Executives

- Coordinate overall business response and recovery
- Coordinate and formulate communication strategy (Corporate, employees, vendors, customers, media, regulators, other key partners)
- Conduct financial and regulatory assessment
- Determine overall firm wide strategy and policies
- Executive decision making e.g. declare event and define scenarios
- Respond to escalated issues
- Conduct post-mortem
- Interface with Corporate executives

Operations Executive Recovery Team (OERT)

- Coordinate overall Operations recovery, response and assessment activities
- Periodic and regular evaluation and updates to BCP strategies including test results, readiness metrics and impact of new procedures, processes and policies
- Identify client, employee, vendor, technology, facility, financial and regulatory impact
- Communicate with staff, clients and key parties e.g. India, vendors, RM's
- Ensure ongoing testing and organization readiness
- Implement decisions and policies from BERT
- Escalate impact, issues etc. to BERT
- Identify industry impact/decisions and participate in meetings/ conference calls
- Conduct post-mortem
- Formulate and coordinate ongoing strategies, policies and decisions
- Maintain and periodically test calling trees and home access
- Test and update plan including participation in technology and industry testing.

Operations Emergency Response Coordinators (OERC)

- Coordinate Operations recovery, response and assessment activities
- Interact and communicate with Corporate BCP, OERT and Operations recovery coordinators
- Conduct post-mortem
- Maintain BCP documentation including defining mission critical activities and recovery times
- Ensure ongoing Operations readiness including staff training
- Educate staff, key partners and clients
- Participate in Industry conference calls
- Monitor and publish financial, regulatory and other key metrics
- Prepare and review readiness metrics
- Determine client processing requirements and interim work rules e.g. delay non critical activity, set business standards and recovery times
- Plan and coordinate organization tests and readiness drills
- Define ongoing and event specific requirements.

5. NOTIFICATIONS

5.1 CLIENT

Each client has a representative in Relationship Management that will be responsible for communication. Conference calls will be conducted as needed to provide updates, coordinate activities and monitor issues

5.2 INTERNAL NOTIFICATION

- Recovery and Response teams are activated.
- Firm wide calling tree will be engaged automatically.
- Employee BCP hotline will be updated.

We also rely on all of our clients to provide us with a list of key contact persons to ensure a proper flow of communication. This list is updated periodically (quarterly basis).

6. PLANNING AND ONGOING READINESS

- During the conversion process, we will work with our customers to:
 - Define mission critical activities, activities which can be delayed and activities which can be temporarily suspended as well as recovery times
 - Determine resources required to support mission critical activities as well as identify staff (at client and Broadridge Managed Services) who can perform those functions
 - Determine locations with available space where functions can be performed including home access and client locations
 - Define self-clearing firms ability to bring work in-house on temporary basis
 - Understand client's firm requirements and testing schedule
 - Establish escalation process and calling trees
 - Document BCP plan
 - Ensure our actions are integrated with the client's corporate strategy
- After the conversion process, we will perform the following activities on a periodic (at least annual) basis:
 - Conduct automated calling tree drills.
 - Update and publish contact lists.
 - Review and update the BCP plan.
 - Conduct internal tests by shifting work, rotating staff or conducting desk top exercises.
 - Participate as required in industry, technology and firm testing.
 - Conduct planning and training sessions with our staff.

6.1 MISSION CRITICAL ACTIVITIES AND KEY RESOURCES

Below are the mission critical activities for the client, along with the critical systems and applications required to support the operations. The below table also indicates our current work capability

(Since this is a template, the below information will be determined in due course)

Client BCP Matrix											
Area	# FTE Required for Critical Functions	Names	# Critical Functions (0-8 hrs)	Critical Systems & Apps	Macro	Work Capability					
						NWK	Edge	MTL	HYD	Delhi	BLR

All of our USA associates have remote access.

6.2 LIST OF CRITICAL FUNCTIONS

Below is the list of mission critical functions that would need to be recovered within the 0-8 hours timeframe for the client’s business. These are the functions that would have multiple back ups.

- Coverage across all locations.
- Remote coverage (USA Ops only).

Department	Function

7. MANAGED SERVICES PREPAREDNESS WHEN KEY APPLICATIONS ARE UNAVAILABLE

Below is a brief example of Managed Services preparedness for a BCP event where key applications are unavailable

Area	Client Citrix	BPS Unavailable	DTCC Unavailable	Impact Unavailable	Other Applications
	•	•	•		•

8. KEY FAX NUMBERS

Department	Managed Services	Client Fax Number	Item/Report Description

9. BCP GROUP EMAIL ADDRESSES

The following group email addresses have been created for use only during a BCP scenario where Managed Services email is unavailable. Managed Services will notify our clients via a MIR3 calling tree at the time of an outage instructing them to use the BCP GROUP EMAIL ADDRESSES listed in the BCP plan. The boxes have send and receive permission for key Managed Services associates. Please refrain from using these during a normal course of business unless otherwise instructed by Managed Services.

Department	BCP Email Address

10. BCP SCENARIOS

The below are possible BCP scenarios that fall under the mission critical functions category (which would be restored within 0-8 hours of a BCP event / disruption)

- Loss of one facility (Newark, Edgewood, Mt. Laurel, Hyderabad, Delhi and Bangalore).
- USA staff unable to get to the US facilities (connect remotely)
- 30% of overall staff unable to connect

In addition, Managed Services will support the clients as below

- Support the client in the Broadridge DR tests and industry tests (if they choose to participate)
- Conduct quarterly calling tree drills

11. LOCATIONS

The addresses of all the facilities for Broadridge Managed Services are as below

Broadridge US

Newark

Two Gateway Center
283-299 Market Street
Newark, NJ 07102
Phone # 201-714-3000

Edgewood

300 Executive Drive
Edgewood, New York 11717

Mount Laurel

110 West Park Drive
Mount Laurel, NJ 08054

Broadridge Canada

4 King Street West
Suite 500
Toronto, Ontario M5H 1B6
Canada

Broadridge India

Hyderabad

Broadridge Financial Solutions (India) Private Limited,
2nd Floor, Block C Building, DivyaSree Omega, Survey No 13,
Kondapur Village, Seri Lingampalli Mandal, Ranga Reddy District,
Hyderabad 500084, Telangana.

New Delhi

Broadridge Financial Solutions (India) Private Limited
Plot No. 32, Block-A,
Genesis, Mohan Co-operative Industrial Estate,
Mathura Road,
New Delhi 110 044.

Bangalore

Broadridge Financial Solutions (India) Private limited.
DivyaSree NR Enclave,
Plot No 1, EPIP Industrial Area,
Whitefield, Bangalore
560066

Client facilities

(Will be listed as provided by the client)

12. KEY CONTACTS

Below are the contact details of all the key contacts at Broadridge Managed Services and the client

12.1 CLIENT'S KEY CONTACTS

Name	Work phone	Cell Phone	Home Phone	Work Email

12.2 BROADRIDGE MANAGED SERVICES COUNTERPARTS FOR THE CLIENT

Name	Work phone	Cell Phone	Home Phone	Work Email

13. QUARTERLY CALLING TREE DRILLS & EMERGENCY NOTIFICATIONS

On a quarterly basis, Broadridge Managed Services would conduct a calling tree drill where the notification system would automatically call all key contacts provided by the client.

Broadridge Managed Services has also allocated a dedicated conference id for the client. This would be used for the purpose of any emergency notification conference.

The dial in number is TBD.