



CORPORATE BUSINESS CONTINUITY & CRISIS MANAGEMENT PLAN

G.R.C. Sector 12/2/18 BC& CM



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PREFACE

Every business, large or small, public or private, should have a crisis management plan. Every division of every company, industrial or service business should also have a crisis management plan. There are no exceptions, merely differences of degree.

Bear in mind that whatever your position within a company; you are not the only person affected by a crisis. In fact, if you are the Chairman or The CEO or in a position to manage or influence the management of a crisis, then consider yourself fortunate. If things go badly, at least you had a chance to control your own destiny.

When the crisis hits, whether it is long or short-fused, you will need certain things to manage it. Planning for what -- and whom -- you will need saves you valuable time in the heat of the crisis, when you would otherwise have to: a) decide what you need and b) then find it.

An effective crisis management plan presets certain key decisions on the mechanical portions of the crisis—those aspects that rarely vary—and leaves you free to manage the content with your hands unfettered.

Another way to look at this is as contingency planning, or conditional thinking_you have to learn to ask "what-if" questions -- and make assumptions about the questions and the answers.

Crisis Management - Planning For the Inevitable

WARBA INSURANCE COMPANY CONFIDENTIAL

NOTE: This Plan is a restricted document containing information on Business Continuity strategy and the names and phone numbers of the Crisis Management Team members. Distribution is on a need-to-know basis and recipients are responsible for its security in accordance with WIC's Information Protection Policy.

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INTRODUCTION

Pursuant to WIC 's Business Continuity Planning Policy (V1.0), this plan describes the reasonable and appropriate steps required to protect WIC's business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Business Continuity planning to minimize the impact of natural or human-caused events and ensure company success is the responsibility of all WARBA's staff.

The ultimate objective of this plan is life safety, business and property protection. Accountable to WIC's BOD, the business unit or senior site executive responsible for this plan must maintain and exercise it such that proper consideration is given to the probability and criticality of potential business interruptions. This plan defines roles, responsibilities, methodology, and implementation requirements. The measure of its success is the efficiency of future crisis response.

POLICY: Business Continuity and Crisis Management Planning at WARBA Insurance Company is governed by the following policy framework.

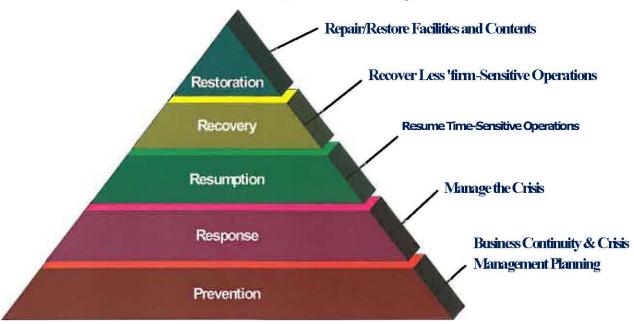
- 1.0 Business Continuity Planning Policy (Appendix A)
- 1.1 Risk Management Policy (Appendix B)
- 1.2 Business Impact Analysis Policy (Appendix C)
- 1.3 Crisis Management Policy (Appendix D)
- 1.4 Crisis Communications Policy (Appendix E)
- 1.5 Information Security Policy (Appendix F).
- 1.6 Governance and Compliance Policy (Appendix G).
- 1.7 Pandemic outbreak Mitigation Policy (Appendix H).
- 1.8 WARBA's Crisis Management Rules and Responsibilities (appendix I).

DEFINITION: This document is designed to identify and plan a response strategy for any global, regional, or local crisis or business interruption that runs the risk of:

- Escalating in intensity, or adversely impacting shareholder value or the company's financial position.
- Causing harm to people or damage to property or the environment.
- Falling under close media or government scrutiny.
- Interfering with the normal business operations.
- Wasting significant management time and/or financial resources.
- Adversely affecting employee morale.
- Jeopardizing the positive public image of the company, its brands, and its officers.
- Any other events considered as a Risk.

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PHASES: Business continuity and crisis management planning is divided into five phases: .

- **Prevention** Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- Response Planning and execution of initial crisis response to protect people, property, share value, and public image.
- Some crisis categories (i.e., information System or Property events) require additional phases.
- Resumption Planning and execution of strategies to resume time-critical operations following an
 event.
- Recovery Planning and execution of strategies to recover less time- critical operations following an
 event.
- Restoration Planning and execution of long-term restoration strategies leading to normal business operations.

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SCOPE

The scope of this WIC's Business Continuity and Crisis Management Plan is:

Location Name	WARBA's Business Continuity& Crisis Management Plan				
Location Mission	WIC Corporate Headquarters, Branches, all applicable Subsidiaries and Affiliates				
Location Address	Shariq, Ahmed Al. Gaber Street, WARBA's Tower				
Location Phone	Main Switchboard 1808181 Security Console 22914449				

CRISIS CATEGORIES & RISK ASSESSMENT

CATEGORIES - WIC Business Continuity and Crisis Management policies identify five crisis categories: 1) Business, 2) Information, 3) Information Systems, 4) People, 5) Property (yellow shaded areas below). Each category has vulnerabilities, which include, but are not limited to, the examples provided. Any emergency or potential crisis should immediately trigger the notification of the Crisis Management Team.

For purposes of this plan, an emergency or potential crisis is any event or circumstance that is beyond the experience, ability and/or responsibility of the manager or supervisor of the business unit or site where the event is first detected or identified. It is better to notify the CMT, than he sitate and allow a minor incident to escalate into a major one.

RISK ASSESSMENT — the matrix below further describes crisis categories and provides a simple vulnerability assessment based on event PROBABILITY and CRITICALITY using a scale of high (H), medium (M), and low (L). Recognizing that assessment is subjective, the goal is to draw attention to risks that are obviously highly probable and critical, especially if preventative measures can be taken to mitigate or reduce their impact or potential.

1	PROBABILITY of CRISIS EVENT (Rate as High (H), Medium (M) or Low (L)							
	↓ ·	CRITICALITY of CRISIS EVENT (Rate as High (H), Medium (M) or Low (L)						
		DESCRIPTION of SITE-SPECIFIC CRISIS EVENT VULNERABILITY						
		BUSINESS - An incident that adversely impacts WIC competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.						
L	Н	 Loss of significant trade partner. 						
М	H	■ Product failure resulting in injury or death.						
M	M	 Product failing to meet requirements, negative publicity. 						
M	М	■ Product recall.						
L	M	■ Government regulatory compliance.						
М	M	Charges of fraud or unethical behavior by an individual.						
L	M	Charges of fraud or unethical behavior by WARBA.						
L	Н	Labor dispute, union strike, work slowdown or stoppage.						
L	Н	Corporate, office or business shutdown or closure.						
L	Н	■ Pandemic.						
L	Н	■ Acts of war or terrorism.						
M	Н	■ Financial mismanagement.						

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M	Н	■ Reinsurance, Medical Providers, Suppliers etc disruption
L	Н	Serious legal issue, i.e., litigation, criminal activity.
L	M	 Significant negative media and/or internet coverage.
L	M	 Offensive advertising by a competitor.
L	Н	Regional currency or another political crisis.
L	Н	 Hostile corporate takeover, merger or other material reorganization
L	Н	■ Worker layoffs
		INFORMATION - The unauthorized disclosure or compromise of WIC CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.
М	Н	Customer information compromise.
M	M	■ Personnel information compromise.
M	M	■ Financial performance information compromise.
М	Н	Pricing information compromise.
M	Н	■ Research or new product design compromise.
L	Н	■ Reinsurance Agreements compromise.
M	M	■ Product or marketing plan information compromise.
M	M	Loss of trade secrets or trademark infringement.
M	М	 Proprietary process or system information compromise.
L	Н	Merger or acquisition plan compromise
M	Н	Stolen laptop with highly confidential information

1	PROBABILITY of CRISIS EVENT (Rate as High (H), Medium (M) or Low (L)							
\$	↓ ·	CRITICALITY of CRISIS EVENT (Rate as High (H), Medium (M) or Low (L)						
		DESCRIPTION of SITE SPECIFIC CRISIS EVENT VULNERABILITY						
		INFORMATION SYSTEM - An incident or threat that affects information systems confidentiality, integrity, or availability.						
Н	M	■ Virus or other malicious code attack.						
M	H	■ Denial of service attack.						
M	Н	■ Compromise of system confidentiality via hacker attack.						
L	Н	■ Password file loss.						
М	H	■ Electronic crimes — unspecified other.						
L	H	■ Compromise of consumer credit files in e-commerce.						
М	Н	 Loss of production, order processing, warehousing, logistics, accounts payable or receivable, payroll, etc. 						
M	H	■ Data center power failure, fire or another incapacitation.						
M	M	■ Fraud Emails.						
L	H	■ Access Rights Violations.						
L	Н	■ System Backup failure or Loss.						
L	H	■ Connection Loss.						

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		PEOPLE - An incident that affects the safety, security or productivity of WIC staff.				
2						
L	Н	Death or serious injury that is work-related				
L	Н	■ Workplace violence.				
L	Н	Bomb threat.				
L	H	Executive group tragedy, i.e., plane crash				
L	H	■ Senior management death or serious injury.				
L	M	■ Random street crime, i.e., mugging, robbery.				
L	M	■ Sabotage.				
L	Н	 Terrorism involving an employee or company facility. 				
L	Н	Political unrest involving employees or families.				
M	M	■ Breach of privacy.				
		PROPERTY - A natural or human-caused event affecting the facilities or operational				
		continuity of WIC or its suppliers, trade channels, and joint venture, partners, subsidiaries				
		and affiliates.				
L	H	Natural disaster (hurricane, flood, earthquake, tornado).				
L	M	■ Severe weather (thunderstorm, heavy snow, ice storm)				
М	Н	■ Fire or explosion				
L	M	■ Roof collapse				
L	M	Facility intrusion				
М	M	Human-caused industrial accident				
L	L	■ Environmental hazard — mishandling wastes.				
L	Н	■ Chemical spill or air pollution.				
L	Н	■ Ground water contamination				
Н	L	■ Vehicle accident or significant cargo loss.				

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CRISIS MANAGEMENT TEAM - ACTIVATION PROCEDURE

Incident Report - Credible information, or rumors about any situation or event that may require activation of the Corporate Crisis Management Team could be received from a variety of sources. Anyone receiving such information should immediately attempt to determine the facts, as well as the reliability and validity of the information. If the information is deemed credible and runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing significant harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its officers
- Any other events considered as a Risk.

Then he/she should escalated it to the Company's CRO and CEO as a CRISIS escalation process, The CRO will investigate the information and prepare an incident report to the Company's CEO and Board Risk Committee, The CRO will discuss the recommended Mitigation plan with the Company's CEO, Once the CEO Confirmed the Plan, The Crisis management Team will be activated,"In case of disagreement or any significant strategic or financial risk cases ".,the CRO will escalate the Crisis incident report to the BOD to discuss the mitigation plan, In case of Crisis The Crisis Management Team "CMT" will be Immediately advised with Mitigation Process and the Crisis Management process will be activated. As time permits, the other members of the CMT should be alerted to a possible activation decision.

Activation Decision — Depending on the nature of the Crisis event, the CMT chair or alternate will make a decision whether or not to convene the CMT, either in-person or by phone. Alternately, the CMT chair may choose to delegate response to the appropriate regional or local CMT.

Communication to Convene — The CMT Chair will prepare a brief communication outlining the nature and scope of the event. To the extent possible, this information should be delivered to all CMT members in-person, by phone, or by voicemail. At minimum, the initial communication should establish:

- Instructions on the information confidentiality.
- Details of plans to convene the CMT.

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timing of the next scheduled update if authority to handle the event has been delegated.

Crisis Management Meeting — A Corporate Crisis Management Center has been established in WIC's CEO's Room. Additionally, two alternate Crisis Management Centers have been identified if the primary is not available due to natural or human-caused disaster, off-site location **A** or the off-site location **B**.

If timing and circumstances make it impossible to convene the CMT in-person, alternatively a meeting may be convened using the WIC's Teleconference Service (see page 12).

NOTIFICATION LIST & TEAM ROSTER

NOTIFICATION LIST - This section provides a call list to ensure prompt notification of management, operations staff, the CMT, Emergency Teams, outside responders, vendors, etc.

CMT Head							
Position The CEO							
CMT Ro	 CMT Role Ultimate Corporate Crisis Management Decision Authority. Communicates with the Board of Directors 						
Work		Page		Home		Cell	
Secretary:			Alternate				

CORPORATE CRISIS MANAGEMENT TEAM ROSTER											
Position				Chief	Chief G.R.C. Officer						
CMT Role					■ Business Continuity Plan owner & CMT Controller.						
Citty Hote		,		Alte	 Alternate communicator to the Board of Directors 					rs	
Work		Page				Home			Cell		
Secretary:						Alterna	ate:				
Position				Head o	of Leg	al Affair	'S				
CMT Role				-			1anagem				
CWI NOIC				Dire	ct Leg	gal, Inves	stigation,	& Police	liaison	- CMT	response.
Work		Page				Home	9	Cell			
Secretary:						Alterna	ate:				
				SUPPO	RT FU	NCTION	LIST				
Name of Pers	on										
Work			Pa	ge			Home			Cell	
Secretary:				,			Alternat	e:			
Name of Pers	on										
Work			Pa	ge			Home			Cell	
Secretary:	Secretary: Alternate:										
Name of Pers	on							•			
Work			Pa	ge			Home			Cell	
Secretary:	Secretary: Alternate:										

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CRISIS MANAGEMENT CENTER

CRISIS MANAGEMENT CENTER — this section identifies the primary and alternate CMC(s). The CMC should be chosen with long-term crisis management in mind considering such factors as CMT food, shelter, power, telecommunications, office equipment, and the ability to prevent media access. The CMC should be close to the workplace of executives that comprise the CMT. It is important that normal work, which also must be done during an emergency, not interfere with CMC activities and vice-versa. The CMC should not attract attention from visitors.

On-site CMC Location Name	
On-site CMC Location Address	
On-site CMC Location Phone	
Primary CMC Location Name	
Primary CMC Location Address	
Primary CMC Location Phone	
Alternate CMC Location Name	
Alternate CMC Location Address	
Alternate CMC Location Phone	

RESOURCES - At a minimum, the CMC shall contain the following:

- Conference Table and chairs
- Readily available social Media's Equipment's for monitoring the news media.
- Work area for secretaries, with a PCs (LAN connected, if needed), and printers.
- Copier, fax, audio-visual equipment (overhead projector, VCR, etc.).
- Table containing media releases, messages, announcements, documents, etc.
- Filing cabinet and storage for supplies, copier and printer paper, note pads, etc.
- Seating for visitors.
- Telephones should be direct lines, bypassing PBX* to compensate for power failure.
- Arrangements should be made for alternative communications (i.e., digital cell phones).

* PBX stands for Private Branch Exchange, which is a private telephone network used within a company or organization.

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WIC TELECONFERENCE SERVICE INSTRUCTIONS

Given WIC's scope, the reality of restricted travel schedules, and the unexpected nature of crisis situations, it is unlikely that all, or even most of the Corporate Business Continuity and Crisis Management Team members would be physically present at the world headquarters Administrative Center when an event erupts. Therefore, to facilitate the urgent communication needs of the Crisis Management Team in the early hours of an event, the WIC/Provider Name Teleconference Service may be utilized. When the CMT needs to meet, any member or designee can organize a teleconference using the possible available communication tools.

COMMUNICATION

COMMUNICATION - Crisis Communications, a vital part of crisis management, is a strategy to communicate timely, accurate information to all WIC stakeholders and the media during any local, regional, or global crisis. Most crises are unpredictable; however, advanced planning to communicate effectively during a crisis can positively impact media perceptions, employee reactions, investor confidence, and ultimately minimize business disruptions.

WIC's Crisis Communications Policy (1.4), stemming from its Business Continuity Policy (1.0) and Crisis Management Policy (1.3), is to take all reasonable and appropriate steps necessary to ensure designated staff effectively communicate timely, accurate information to all WIC stakeholders during an event affecting its business, reputation, people, or the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Pursuant to the Corporate Crisis Communications Plan, the Global Communications office coordinates crisis communication via Local and Regional Communications departments.

PHASES - WIC's Business Continuity and Crisis Management policies divide crisis events into five phases: Prevention, Response, Resumption, Recovery, and Restoration. Crisis Communication mainly focuses on the Prevention and Response phases since Resumption, Recovery, and Restoration relate to long-term rebuilding of assets lost in a nature or human-caused event. Crisis Communication phases include:

Assess - Assess the crisis severity and scope with the CMT to gauge communications needs, tools and timing.

Notify - Notify key constituents of the crisis in a timely fashion (Immediately or depending on the level of crisis).

Inform - Communicate with key internal and external audiences, providing news and updates. Respond - Provide timely response to inquiries from the media and other stakeholders. Record - Track and record inquiries and outgoing information.

Collect - Gather copies of articles, interviews, media, etc., resulting from the incident/situation. Evaluate - Evaluate crisis communication plan execution, implement process improvements.

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CRISIS COMMUNICATIONS TEAM ROSTER							
Pers	son		Role/Position				
Name of Person							
Work	Pag	ge	Home	Cell			
Secretary:			Alternate:				
Name of Person		319					
Work	Pag	ge	Home	Cell			
Secretary:			Alternate:				
Name of Person							
Work	Pag	ge	Home	Cell			
Secretary:		4/	Alternate:	100			
Name of Person							
Work	Pag	ge	Home	Cell			
Secretary:			Alternate:				
Name of Person							
Work	Pag	ge	Home	Cell			
Secretary:			Alternate:				

PRE-PLANNING ACTIONS for a PUBLIC IMAGE CRISIS

- Pre-establish and exercise communication methods for employees such as an emergency broadcast voicemail box to dial in for announcements, and Emergency Bulletin email.
- Develop a wallet-sized emergency contact card for CMT member and update as required.
- Pre-establish media relationships and incorporate their contact information into this plan.
- Inform media that the primary media room is the (CEO's Meeting Room) where they will always come for news. The alternate site if the primary is unsafe is the (Chairman's Meeting Room).
- Ensure the media room has adequate power, audio equipment, phones, lighting, seating, and is conducive to controlled access. Conduct a room tour and resolve issues in advance.
- Advise the IT Security Manager to escort all media and outsiders arriving during a crisis to the media room. Control access to the premises and do not allow the media to wander.
- Designate one spokesperson to meet with the media and the public in order to avoid the contradictions that will creep in if there are too many voices.
- Select a spokesperson that is a subject matter expert who can convincingly articulate WIC's event.
 Make it clear that this is the person outsiders are to query.
- Select media savvy person who is cool, informed, unflappable and tough-minded as well as affable --- the media can sense a pushover. Provide hostile media training for that person.

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CRISIS ACTIONS for a PUBLIC IMAGE CRISIS

- Open lines of communication and be accessible to anyone with useful information.
- Get on top of the situation and pinpoint the problem. Identify the salient facts, determine what is at issue, and what specific aspect of WI's C operations or service is offensive?
- Assign accountability for monitoring all the media outlets to ensure you keep abreast of the latest developments or spin. Determine why the issue has jumped into prominence?
- Reconstruct events into some coherent pattern and track down what led up to problem.
- Find out who is involved and why?
- Identify the "influential" and learn their motivations.
- Engage a professional public relations firm, a resource whose judgment is respected.
- Construct a "best case." Give background and tell WIC's "event", a reconstruction of the facts and an interpretation from the company's viewpoint. Protect WARBA's credibility.
- Reveal important but often overlooked prior events that help explain the current conditions.
- Be honest, factual, concerned, and willing to accept blame rightfully attached to Warba.
- Consult legal counsel to identify danger points, and understand litigation exposure.
- Develop a sense of what can be said and done and what words or acts should be avoided.
- Do not over react to legal concerns. Overzealous protection of legal positions may cost WIC the public image battle! This stance produces the corporate stonewall, which makes even a sincere, concerned management look ignorant, indifferent, and guilty.
- Communicate regularly with stakeholders and employees and tell them what is known. Encourage
 them to call if they are worried or have useful information.
- Develop rapport with the journalists and stay closer to those who report the story fairly.
- Designate times for update briefings in the media room.
- Control press conferences and interviews. Remember, and don't accept or comment on speculation.
- If important information is lacking, say so, but add that an investigation is underway.
- If unfavorable developments force the story to be modified, do so and explain why. No one blames a company that appears to be keeping an open mind and is responding to new data.
- Resolve the image crisis quickly. Letting too much time elapse between the start of the problem and its resolution will damage WIC's reputation, even if it is not at fault.

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PREVENTION

PREVENTION STRATEGY - This section describes general actions and pre-incident measures that should be taken to manage risk impact.

- Obtain senior leader sponsorship of Business Continuity and Crisis Management Planning.
- Foster prudent Business Continuity and Crisis Planning via the employee appraisal process.
- Overcome the tendency to procrastinate planning for a Crisis, make it a business priority.
- Ensure business processes and resource allocation decisions identify and manage risk.
- Conduct a Business Impact Analysis to quantify and qualify organizational exposures.
- Educate decision makers on Business Risk Analysis "BRA "results and accelerate high-risk reduction initiatives.
- Prioritize business risk reduction strategies consistent with capital and expense budgets.
- Institutionalize Business Continuity and Crisis Management by assigning accountability.
- Define department level roles, responsibilities, and accountabilities in plan development.
- Establish deadlines for development, review, and approval of Crisis Management Plans.
- Train Crisis Management Team members and other affected parties on CMT protocol.
- Exercise and maintain plans and review for currency on at least an annual cycle.
- Evaluate Crisis Management Team performance after each crisis event.
- Continuously improve the Crisis Management planning process.

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CATEGORY SPECIFIC PREVENTION STRATEGY - This section describes proactive plans and pre-incident measures that should be taken to manage the risk impact associated with the specific vulnerabilities identified in each crisis category.

Business Crisis Prevention - WIC's competitive position, its reputation, brand names, workforce morale and productivity are maintained by executive-sponsored organizational commitment to the company Vision, Values, and Business Strategy. It is the responsibility of all WIC's staff to prevent, detect, and report any incident that adversely impacts the company's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.

Actions:

- Protect the hard-earned industry leadership position by ethical business practices and compliance
 with the Business Conduct and Conflict of Interest Policies. Continuously improve relations with
 employees, trade partners, suppliers to ensure business continuity.
- Train all WIC staff on the company's Vision, Values, Business Strategy, to ensure company success.
- Report immediately to the CMT, any potential crisis that is beyond the experience, ability and/or
 responsibility of the manager where the event is identified. Early detection and quick response can
 reduce the potential for a minor issue becoming a major crisis.

Information Crisis Prevention — Information Security is the responsibility of all WIC's staff. Employee compliance with the WIC's Information security Policy is the most effective deterrent to an information crisis. Should there be an unauthorized disclosure, compromise or suspected compromise of WIC's CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual, it should be reported to Corporate IT Security immediately.

Actions:

- Protect all WIC's offices, branches, subsidiaries and affiliates and third party data pursuant to Information IT security Policy.
- Train employees and enforce policies to prevent information compromise.
- Report The IT-Security Management CMT.

Information Systems Crisis Prevention — prudent use of Information Systems and IS Security is the responsibility of all WIC staff. Compliance with the WIC Information Systems and IS Security Policies is the most effective deterrent to an Information Systems Security crisis. Global Information Systems and the Information Security Group should be promptly informed of any incident or threat that affects system:

Confidentiality - protection against unauthorized information systems access, intentional or accidental, which could compromise WIC INTERNAL or CONFIDENTIAL information, Integrity - protection against accidental or intentional damage, modification, destruction of information systems and networks, or Availability - protection to ensure information systems work promptly and service is not denied to authorized users.

Actions:

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- Protect all information systems pursuant to the Information Systems and IS Security Policies and the Information Systems Security Architecture.
- **Train** prevent systems compromise by employee training and policy enforcement. Observe prudent workstation protocol, i.e., protect passwords, secure laptops, and backup files, etc.
- Report threats to Work Station Support or Information Security.

People Crisis Prevention — Personnel Security is the responsibility of all WIC's staff. Common sense and personal attention to issues or threats that may affect the safety, security or productivity of WIC staff is the most effective deterrent to a People crisis.

Actions:

- Protect all WIC's staff and prevent security threats by enforcing Human Resources, Safety, and Security policies, including, but not limited to workplace violence, substance abuse, safety, smoking, parking, badge and identification, visitor escort, facility positive access control, etc.
- Train employees and contractors on policies governing facility positive access control, visitor escort, parking, badge and identification, and other safety and security rules. Observe prudent personal security practices like travel security, and protection of valuables.
- Report Human Resources, CMT.

Property Crisis Prevention - Any natural or human-caused event affecting the facilities or operations of WARBA or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

Actions:

- Protect WARBA from property damage threats by enforcing security, environmental, health and safety rules and regulations designed to prevent, detect, and respond to natural and human-caused events such as fire, flood, chemical spill, etc. Fund and maintain systems like fire alarms, sprinklers, intrusion detectors, closed-circuit television, and public address systems, which are designed to detect and suppress violent or catastrophic events.
- **Train** employees and contractors on policies governing facility positive access control, visitor escort, parking, badge and identification, and other safety and security rules.
- Report events or threats needing manager, Human Resources, Security, or Legal action.

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RESPONSE

RESPONSE STRATEGY - This section describes plans and strategies for initial crisis response to protect people, property, share value, public image and manage the early stages of a crisis.

Business Crisis Response — for any incident that adversely impacts WIC's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.

Actions:

- Detect identify the crisis or potential crisis event. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. For a brewing or potential business crisis such as litigation, monitor events and provide early warning to the CMT and appropriate stakeholders.
- Notify alert the CMT immediately, of any crisis that is beyond the experience, ability and/or responsibility of the manager where the event is identified. Remember, early detection and quick response can reduce the potential for a minor issue becoming a major crisis.
- Assemble brief the CMT and subject matter experts on the business crisis.
- Assess conduct a risk assessment, assign accountability, and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- Plan guided by WIC's commitment to the company Vision, Values, and Business Strategy, develop
 a plan to protect the company's competitive position, reputation, brand names, workforce morale
 and productivity.
- Act execute the plan and protect the company's hard-earned industry leadership position. Improve business continuity with corrective actions that minimize future event potential. Move to resumption, recovery and restoration phases as needed.
- Update the CMT and all stakeholders in accordance with the Crisis Communication Plan.

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Information Crisis Response — for any unauthorized disclosure or compromise of Warba's CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.

Actions:

- **Detect** identify the information disclosed or compromised. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional compromise potential immediately.
- **Notify** alert the CMT immediately, of any disclosure or compromise of WIC's CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.
- Assemble brief the CMT and subject matter experts on the information crisis.
- Assess conduct a Risk assessment, assign investigation accountability, and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- Plan utilizing the processes and cross-functional skills of the Corporate IT Security Team, rapidly develop an investigative plan to determine how, what, where, when, and why WIC's CONFIDENTIAL information was compromised.
- Act assign responsibility and execute the investigative plan. For cases involving employee misconduct, pursue disciplinary action pursuant to Human Resources Policy. For cases involving crime perpetrated by external threats, pursue criminal prosecution coordinated by the Business Ethics Team. Minimize future compromise potential and move to resumption, recovery and restoration phases as needed.
- **Update** the CMT and all stakeholders in accordance with the Crisis Communication Plan.

Information Systems Crisis Response — for any incident or threat that affects information systems confidentially, integrity, or availability.

Actions:

- **Detect** identify the information system crisis. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional crisis impact potential immediately.
- **Notify** alert the CMT immediately, of any incident or threat that affects information systems confidentiality, integrity, or availability.
- Assemble brief the CMT and subject matter experts on the information systems crisis.
- Assess conduct a damage assessment, assign accountability, and define a response strategy.
 Determine timelines, priorities, resources required, and kickoff planning.
- Plan utilizing the cross-functional skills of the Global Information Systems, Problem Management Process, the Information Security and the IT Team, and as necessary, the Business Compliance Team, rapidly develop a plan to determine how, what, where, when, and why information systems confidentiality, integrity, or availability was compromised.

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- Act immediately deploy the Problem Management Process and as necessary the Data Center Disaster Recovery Plan developed and maintained by Global Information Systems. Conduct an investigation to determine the root cause for the compromise. For cases involving employee misconduct, pursue disciplinary action pursuant to Human Resources Policy. For cases involving computer crime perpetrated by external threats, pursue criminal prosecution coordinated by the Business Ethics Team. Minimize future compromise potential and move to resumption, recovery and restoration phases as needed.
- Update the CMT and all stakeholders in accordance with the Crisis Communication Plan.

People Crisis Response — for any incident that affects the safety, security or productivity of WIC staff. Many people crisis events also involve a property crisis, i.e., a fire or tornado.

Actions:

- Detect identify the people crisis. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional impact potential immediately and focus on life safety using Protective Services, Corporate Security, Human Resources, specialized consultants, law enforcement, emergency medical, fire and other municipal or contract agencies as appropriate.
- Notify alert the CMT immediately, of any incident that affects the safety, security or productivity of WIC staff.
- Assemble brief the CMT and subject matter experts on the people crisis.
- Assess conduct a damage assessment and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- Plan utilizing the cross-functional skills of Human Resources, Corporate Security, rapidly develop
 a plan to determine how, what, where, when, and why the people crisis happened and what can be
 done to minimize or limit the impact.
- Act assign responsibility and execute the plan. For cases involving employee misconduct, pursue
 disciplinary action pursuant to Human Resources Policy. For cases involving crime perpetrated by
 external threats, pursue criminal prosecution coordinated by the Business Ethics Team. Minimize
 future incident potential and move to resumption, recovery and restoration phases as needed.
- Update the CMT and all stakeholders in accordance with the Crisis Communication Plan.

Property Crisis Response — for any natural or human-caused event affecting the facilities or operations of WARBA or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

Actions:

 Detect - identify the property crisis. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional impact potential immediately. Focus first on life safety and second on property protection.

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- Notify alert the CMT immediately, of any natural or human-caused event affecting the facilities or operations of WIC or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.
- Assemble brief the CMT and subject matter experts on the property crisis.
- Assess conduct a damage assessment, assign responsibilities, and define a response strategy.
 Determine timelines, priorities, resources required, and kickoff planning.
- Plan utilizing the cross-functional skills of Corporate Real Estate, Corporate Security, develop a
 property recovery plan. Determine how, what, where, when, and why the property crisis happened.
- Act assign responsibility and execute the plan. Minimize future compromise potential and move to resumption, recovery and restoration phases as needed.
- Update the CMT and all stakeholders in accordance with the Crisis Communication Plan.

Use the following table to prioritize response tasks.

242	
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1. 2.
(Insert Goals)	3.
Course of Action	1.
(Insert Actions)	2.
(IIIscre / Icdons)	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1.
(Insert Goals)	2.
	3.
Course of Action	1.
(Insert Actions)	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1.
(Insert Goals)	2.
	3.
Course of Action	1.

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(Insert Actions)	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1.
(Insert Goals)	2.
	3.
Course of Action	1.
(Insert Actions)	2.
	3.

RESUMPTION

RESUMPTION STRATEGY - This section is designed to get the CMT to focus on and describe, plans and strategies to resume time-sensitive operations following a crisis. It requires the CMT to identify and prioritize worst case loss crisis events, and to describe impact on business operations. Primary resumption goals and initial course of action are then detailed. In a crisis, if the event does not occur, the CMT moves to the next resumption phase priority issue.

Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1. 2. 3.
Course of Action (Insert Actions)	1. 2. 3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1. 2. 3.
Course of Action (Insert Actions)	1. 2. 3.
Impact on Business (Insert Description)	

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Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.

RECOVERY

RECOVERY STRATEGY - This section is designed to get the CMT to focus on and describe, plans and strategies to resume less time-sensitive operations following a crisis. It requires the CMT to identify and prioritize less critical crisis events, and to describe the impact on business operations. Primary recovery goals and initial course of action are then detailed. In a crisis, if the event does not occur, the CMT moves to the next recovery phase priority issue.

Impact on Business (Insert Description)	
Response Task (Insert Task)	
	1.
Primary Goals (Insert Goals)	2.
(Insert doals)	3.
	1.
Course of Action (Insert Actions)	2.
(IIIsert Actions)	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1.
(Insert Goals)	2.
	3.
Course of Action	1.
(Insert Actions)	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1.
(Insert Goals)	2.
	3.

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Course of Action	1.
(Insert Actions)	2.
	3.

RESTORATION

RESTORATION STRATEGY - This section is designed to get the CMT to focus on and describe plans and long-term restoration strategies leading to normal business operations. It describes, for example e, a strategy to repair the primary facility or construct a new facility.

Impact on Business (Insert Description)	
Response Task (Insert Task)	
Duine Carle	1.
Primary Goals (Insert Goals)	2.
(macre dodia)	3.
Course of Action	1.
(Insert Actions)	2.
,	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1.
(Insert Goals)	2.
	3.
Course of Action	1.
(Insert Actions)	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals	1.
(Insert Goals)	2.
	3.
Course of Action	1.
(Insert Actions)	2.
	3.

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PLAN EXERCISES

PLAN EXERCISES - Proof and confidence that this plan will work results from completion of a successful exercise of its strategies. Plan exercises, such as a tabletop or tactical exercise described below, determine CMT readiness, and whether plans are adequate, and up-to-date.

Tabletop Exercise - a crisis scenario is established and the CMT will "walkthrough" their action items in a role-play involving the CMT leaders and alternates. The scenario is made available in advance to allow team members to review their actions in response to the scenario. The Plan is checked for any errors or omissions and any necessary changes are implemented.

Tactical Exercise - is a simulated crisis, conducted in a "war game" format. All members of the CMT are required to participate and perform their tasks under announced or surprise conditions, and with information that is made available by the exercise monitor, simulating an actual crisis. Generally, a scenario is provided to all CMT members located in a large conference room or utilizing videoconferencing if it involves multiple sites. A "speeded up" clock is employed, in order to complete 3 days' worth of actions in one working day. The Plan is checked for any errors or omissions and any necessary changes are implemented.

Exercise Scenarios - are developed to achieve outcomes and objectives established by management. Some of the considerations in the development of exercise scenarios are:

- Re-exercising plan segments that were determined to be deficient in past exercises.
- Exercising plans on crisis scenarios never tested previously.
- Involving CMT members who are new or need more training and preparation.
- Ensuring the exercises specify the extent of various damages or conditions, such as the files, documents, personnel, etc. that are available or not available to support the CMT.

Education and Training - Awareness of the need for maintaining, a viable crisis management capability is essential. This is achieved through education and training sessions conducted on a regular basis. The objectives of training are to:

- Train the employees who help maintain the Plan in a constant state of readiness.
- Train the employees who execute various plan segments.
- Heighten awareness for those employees not directly involved in executing the plan.

PLAN MAINTENANCE

PLAN MAINTENANCE — requires the appointment of a CMT Coordinator accountable for plan updates. Maintenance is either scheduled or unscheduled. Scheduled maintenance is time-driven; unscheduled maintenance is event-driven. Scheduled maintenance consists of quarterly reviews and updates as well as annual structured walkthrough and/or tactical exercises. Unscheduled maintenance is unpredictable and cannot be scheduled such as when there is an acquisition or merger, transfers, promotions, personal relocation (i.e., home telephone number change), or resignations of individuals on the Emergency Notification List or CMT roster.

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APPENDICES

APPENDICES — provided as appendices are policies, call trees, site maps, or other plans addressing a specific crisis topic as required.

APPENDIX A— BUSINESS CONTINUITY PLANNING POLICY

Policy Owner	G.R.C Sector	Applies to: ALL WIC Functions& Operations				
Subject	Business Continuity Planning Policy	Effective Jan - 2019	Ref.	Supersedes New	Pages	

1.0 INTRODUCTION Business Continuity Planning is a vital process directed towards maintaining company profitability and protecting the interests of its stakeholders. It embraces the identification and evaluation of risk events, the minimization of their probability and impact, and response planning for rapid business restoration should the unexpected happen.

2.0 POLICY WARBA's Business Continuity Policy is to take all reasonable and appropriate steps necessary to protect its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Business Continuity planning to minimize the impact of natural or human-caused events and ensure company success is the responsibility of all WARBA'S staff.

3.0 PURPOSE & SCOPE The purpose of this policy is to formalize Business Continuity planning and provide guidelines for plan development, maintenance and testing. Accountable to the President, all business units must develop, maintain and exercise Business Continuity plans that account for the probability and criticality of potential business interruptions.

4.0 DEFINITION Business Continuity planning is designed to identify and plan a risk minimization strategy for any global, regional, or local crisis or business interruption that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its officers.
- Any other events considered as a Risk.

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5.0 CATEGORIES Business interruptions or crisis situations generally fall into one of the following categories:

- Business An incident that adversely impacts WIC's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.
- Information the unauthorized disclosure or compromise of WIC's CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.
- Information System An incident or threat that affects information systems confidentiality, integrity, or availability.
- **People** An incident that affects the safety, security or productivity of WIC staff.
- Property A natural or human-caused event affecting the facilities or operational continuity of WIC or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

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Policy Owner	G.R.C Sector	Applies to: ALL WIC Functions& Operations				
Subject	Business Continuity Planning Policy	Effective	Ref.	Supersedes	Pages	
	Business Continuity Planning Policy	Jan - 2019	1.0	New	2 of 2	

6.0 BUSINESS CONTINUITY PHASES WIC's Business Continuity Plan guide divides business continuity management into five phases:

- Prevention Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- Response Planning and execution of initial crisis response to protect people, property, share value, and public image.
- Resumption Planning and execution of strategies to resume time-sensitive operations following an
 event.
- Recovery Planning and execution of strategies to recover less time-sensitive operations following an event.
- Restoration Planning and execution of long-term restoration strategies leading to normal business operations.

7.0 PROCESS A Business Continuity Plan model is part of WIC's Business Continuity Plan Guide. The Business Continuity planning process generally includes, but may not be limited to:

- Managing Risk (Policy 1.1) management of risk includes a variety of proactive steps to mitigate, transfer, or finance risk to an acceptable level. Examples are: insurance, fire protection, security measures, health and safety measures.
- Business Risk Analysis (Policy 1.2) a BRA is designed to qualify and quantify exposures to an organization and identify the financial and operational impacts that may result from a disruption of business. It may be applied whenever it is critical that a cost-benefit analysis supports an investment decision. WIC's Corporate Risk Management, in conjunction with external Risk Brokers and Insurers, conduct a BRA for production facilities on a periodic basis.
- **Crisis Management** (Policy 1.3) is a strategy to react immediately to unexpected events that threaten WIC's business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes.
- Crisis Communication (Policy 1.4) is a strategy to communicate timely, accurate information to all WIC stakeholders and the media. All Crisis Communication is coordinated through the Global Communications function that has developed an enterprise-wide Crisis Communication Plan.

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APPENDIX B — RISK MANAGEMENT POLICY

Policy Owner	G.R.C Sector	Applies to: ALL WIC Functions& Operations				
Subject	Risk Management Policy	Effective Jan - 2019	Ref. 1.0	Supersedes New	Pages 1 of 3	

1.0 INTRODUCTION Managing business risks is a key element of the business continuity planning process directed towards maintaining company profitability and protecting the interests of its stakeholders. It embraces the identification and evaluation of risks and vulnerabilities, the minimization of their probability and impact, and contingency planning for rapid business restoration should the unexpected happen.

2.0 POLICY Stemming from its Business Continuity Policy (1.0), WIC's Risk Management Policy (1.1), is to take all reasonable and appropriate steps necessary to protect its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Managing risks to minimize the impact of natural or human-caused events and ensure company success is the responsibility of all WIC's staff.

3.0 PURPOSE & SCOPE The purpose of this policy is to formalize Risk Management as part of Business Continuity Planning and to provide implementation guidelines. Accountable to the BOD, all business units must develop and execute plans that account for the probability and criticality of potential business risks and interruptions.

4.0 DEFINITION Risk Management includes a variety of proactive steps to mitigate, transfer, or finance risk to an acceptable level. It is part of a comprehensive business continuity strategy designed to reduce the potential for any global, regional, or local crisis or business interruption that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close unsolicited media, government, or regulatory authority scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its employees or officers.
- Any other events considered as a Risk.

WIC's Business Continuity Planning and Crisis Management policies highlight five crisis categories. These areas of risk, along with the associated vulnerabilities are highlighted in 7.0 below.

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5.0 BUSINESS CONTINUITY PHASE WIC's Business Continuity policy divides crisis events into five phases:

- Prevention Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- Response Planning and execution of initial crisis response to protect people, property, share value, and public image.
- Resumption Planning and execution of strategies to resume time-sensitive operations following an
 event.
- Recovery Planning and execution of strategies to recover less time-sensitive operations following
- Restoration Planning and execution of long-term restoration strategies leading to normal business operations.

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Policy Owner	G.R.C Sector	Applies to: AL	tions& Operations		
Subject	Piels Management Policy	Effective	Ref.	Supersedes	Pages
	Risk Management Policy	Jan - 2019	1.0	New	2 of 3

Risk Management primarily focuses on Prevention since Response, Resumption, Recovery, and Restoration related to the immediate and long-term strategies once a natural or human-caused event happens.

6.0 PROCESS Responsibility for risk management resides with business unit executives and site operational managers. Comprehensive risk management requires long-range strategy and tactical execution of programs designed to identify, understand, and implement the most cost-efficient and effective alternative to mitigate, transfer or finance business risk. Viewed as a process, risk management is cyclical and generally includes, but may not be limited to:

- Business Risk Analysis (Policy 1.2) a BRA is designed to qualify and quantify exposures and identify the financial and operational impacts that may result from a business interruption. Corporate Risk Management, in conjunction with the Risk Owners, facilitate a periodic BRA for production facilities, or when operational managers need a BRA to support risk reduction investment decisions.
- Risk Reduction includes various site-specific and locally managed steps, designed to mitigate, transfer, or finance risk to an acceptable level. Examples include, but are not limited to, insurance, fire protection, IT security, safeguards, training programs, or health and safety measures.
- Oversight conducted at the Corporate, Regional, or Local level, oversight includes the monitoring
 of risk mitigation strategies. Risk reduction efficiency and cost-effectiveness are enhanced by global
 leveraging, standardization of risk management strategies, and continuous process improvement.

7.0 CATEGORIES and VULNERABILITIES WIC's Business Continuity and Crisis Management policies identify five crisis categories (shaded areas) or areas of risk. Each category has vulnerabilities, which include, but are not limited to, the examples:

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Policy Owner	G.R.C Sector	Applies to: ALL WIC Functions& Operations				
C. Maria	Risk Management Policy	Effective	Ref.	Supersedes	Pages	
Subject	RISK Management Policy	Jan - 2019	1.0	New	3 of 3	

Business - An incident that adversely impacts WIC's competitive position. tarnishes its reputation or brand names or reduces workforce morale and productivity.

- Loss of significant trade partner
- Product failure resulting in injury or death
- Product failing to meet requirements, negative publicity
- Product recall
- Government regulatory compliance
- Charges of fraud or unethical behavior by an individual
- Charges of fraud or unethical behavior by WIC
- Labor dispute, union strike, work slowdown or stoppage
- Corporate, office or business shutdown or closure

- Acts of war or terrorism
- Financial mismanagement
- Re insurance, medical Providers or Supply chain disruption.
- Serious legal issue, i.e., litigation, criminal activity
- Significant negative media and/or Internet coverage
 Offensive advertising
- Regional currency or other political crisis
- Hostile corporate takeover, merger or other major reorganization
- Worker layoff

Information - The unauthorized disclosure or compromise of WIC CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.

- Customer information compromise
- Personnel information compromise
- Financial performance information compromise
- Pricing information compromise
- Research or new product design compromise
- Industrial espionage

- Product or marketing plan information compromise
- Loss of trade secrets or trademark infringement
- Proprietary process or system information compromise
- Merger or acquisition plan compromise
- Stolen laptop with highly confidential information

Information System - An incident or threat that affects information systems confidentiality, integrity, or availability

- Virus or other malicious code attack
- Denial of service attack
- Compromise of system confidentiality via hacker attack
- Password file loss
- Electronic crimes unspecified other

- Compromise of consumer credit files in ecommerce.
- Loss of production, order processing, warehousing,
- Logistics, accounts payable or receivable, payroll, etc.
- Data center power failure, fire or another incapacitation.

People - An incident that affects the safety, security or productivity of WIC staff.

- Death or serious injury that is work-related
- Workplace violence
- Bomb threat
- Executive group tragedy, i.e., plane crash
- Senior management death or serious injury
- Substance abuse

- Random street crime, i.e., mugging, robbery
- Sabotage
- Terrorism involving an employee or company facility
- Political unrest involving employees or families
- Breach of privacy

Property - A natural or human-caused event affecting the facilities or operational continuity of WIC or its suppliers, trade channels, and joint venture partners, subsidiaries and affiliates.

- Natural disaster (hurricane, flood, earthquake, tornado)
- Severe weather (thunderstorm, heavy snow, ice storm)
- Fire or explosion
- Roof collapse
- Facility intrusion

- Human-caused industrial accident
- Environmental hazard mishandling wastes
- Chemical spill or air pollution
- Ground water contamination
- Vehicle accident or significant cargo loss

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APPENDIX C — BUSINESS RISK ANALYSIS POLICY

Policy Owner	G.R.C Sector	Applies to: AL	tions& Operations	
Subject	Business RISK Analysis Policy	Effective Ref. Supersedes	Supersedes	Pages
	business RISK Analysis Policy	Jan - 2019	1.0	New

1.0 POLICY Stemming from its Business Continuity Policy (1.0), WIC's Business Risk Analysis Policy (BRA) is to periodically conduct a BRA to qualify and quantify risk exposures and to identify the financial and operational impacts that may result from a disruption of business. A BRA is part of WIC's strategy to take all reasonable and appropriate steps necessary to protect its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes.

2.0 PURPOSE & SCOPE The purpose of this policy is to formalize Business Impact Analysis as part of Business Continuity Planning and to provide implementation guidelines. Accountable to the BOD, all business units are responsible for conducting a BRA coordinated by Corporate Risk Management in conjunction with The Risk owners.

3.0 DEFINITION Business Risk Analysis is the first step in comprehensive Business Continuity Planning. It provides a financial overview of risk exposure, facilitates prioritization of risk mitigation efforts, and enhances overall understanding of the potential impact of any global, regional, or local crisis that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position.
- causing harm to people or damage to property or the environment.
- falling under close unsolicited media, government, or regulatory authority scrutiny.
- interfering with the normal business operations.
- wasting significant management time and/or financial resources.
- adversely affecting employee morale.
- jeopardizing the positive public image of the company, its brands, and its employees or officers.
- Any other events considered as a Risk.

4.0 BUSINESS CONTINUITY PHASES WIC's Business Continuity policy divides crisis events into five phases:

- Prevention Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- Response Planning and execution of initial crisis response to protect people, property, share value, and public image.
- Resumption Planning and execution of strategies to resume time-sensitive operations following an
 event.
- Recovery Planning and execution of strategies to recover less time-sensitive operations following an event.

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Restoration - Planning and execution of long-term restoration strategies leading to normal business
operations. Business Impact Analysis primarily focuses on the Prevention phase; however, it helps
prioritize the steps to be taken in Response, Resumption, Recovery, and Restoration strategies.

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Policy Owner	G.R.C Sector	Applies to: ALL WIC Functions& Operations				
California	Business Risk Analysis Policy	Effective Ref. Supersedes	Pages			
Subject	Business Risk Analysis Policy	Jan - 2019	1.0	New	2 of 2	

5.0 PROCESS The responsibility for conducting business Risk analysis to qualify and quantify exposures and identify the financial and operational impacts that may result from a business interruption resides with business unit executives and site operational managers. Corporate Risk Management, in conjunction with external owners, facilitate a BRA for production facilities on a periodic basis. However, a BRA may also be applied when cost-benefit analysis is required to support local risk reduction investment decision. The BRA process includes, but may not be limited to:

- Survey Tool development of a survey instrument that captures useful information on key business
 drivers affecting operational excellence, their inherent risks and vulnerabilities, and the financial
 impact of any potential disruption.
- Pilot Study confirmation of the reliability and validity of the survey tool in a small-scale test, along
 with improvement of the instrument as necessary.
- Survey Research data gathering over the desired BRA scope using the validated survey instrument.
- Compilation processing raw survey data into a financial model that graphically illustrates risk
 exposures in a fashion that facilitates the establishment of mitigation priorities.
- Validation clarification or verification of survey results that appear incomplete, inaccurate, or confusing.
- Analysis review of survey results and development of clear picture of the relative importance of individual exposures.
- **Prioritization** establishment of risk reduction priorities based upon criteria defined by senior leadership and consistent with business unit strategic plans.
- Reporting presenting the results to management in a format that facilitates informed resource allocation decisions based on a clear understanding of operational imperatives and resource constraints.
- Revision recalibration of the BRA results upon receipt of management feedback.
- Dissemination circulation of final BRA results to business unit personnel responsible for business continuity planning, crisis management, and risk mitigation.

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APPENDIX D — CRISIS MANAGEMENT POLICY

Policy Owner	G.R.C Sector	Applies to: ALL WIC Functions& Operations			
Subject	Crisis Management Policy	Effective Jan - 2019	Ref. 1.0	Supersedes New	Pages 1 of 3

1.0 INTRODUCTION An unexpected event which is mishandled, or which the public perceives to be mishandled, can quickly turn into a crisis threatening the wellbeing of the company. The key elements in reacting effectively to an unforeseen event are speed, good judgment, and good communication. While every potential crisis may be different, many of the procedures for reacting to them are common. Therefore it is prudent to identify and practice those procedures to save time and concentrate resources to minimize the effects of a potential crisis.

2.0 POLICY Stemming from its Business Continuity Policy (1.0), WIC's Crisis Management Policy (1.3) is to take all reasonable and appropriate steps to react immediately to unexpected events that threaten its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Crisis Management planning to minimize the impact of natural or human-caused events and ensure company success is the responsibility of personnel specifically assigned to business unit Crisis Management teams.

3.0 PURPOSE & SCOPE The purpose of this policy is to formalize Crisis Management planning and provide guidelines for plan development, maintenance and testing. Corporate and regional headquarters and important sites such as factories, warehouses, and data or financial centers must maintain Crisis Management plans as a part of their Business Continuity program. Plan detail should be commensurate with the probability and criticality of each crisis event type.

4.0 DEFINITION A crisis at WARBA is a global, regional, or local incident or situation that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company and its officers.
- Any other events considered as a Risk.

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Policy Owner	G.R.C Sector	Applies to: ALL WIC Functions& Operations				
Subject	Crisis Management Policy	Effective	Ref.	Supersedes	Pages	
		Jan - 2019	1.0	New	2 of 3	

5.0 CATEGORIES Crisis situations generally fall into one of the following categories:

- Business An incident that adversely impacts WIC's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.
- Information the unauthorized disclosure or compromise of WIC CONFIDENTIAL information that
 would likely have an adverse impact on the company's competitive position, tarnish its reputation,
 or embarrass an individual.
- Information System An incident or threat that affects information systems confidentiality, integrity, or availability.
- **People** An incident that affects the safety, security or productivity of WIC staff.
- Property A natural or human-caused event affecting the facilities or operational continuity of WIC or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

6.0 PHASES ACBMS's Business Continuity Plan guide divides crisis management into five cyclical phases:

- Prevention Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- Response Planning and execution of initial crisis response to protect people, property, share value, and public image.
- Resumption Planning and execution of strategies to resume time-sensitive operations following a disaster.
- Recovery Planning and execution of strategies to recover less time-sensitive operations following
 a disaster.
- Restoration Planning and execution of long-term restoration strategies leading to normal business operations.

7.0 PLAN A Crisis Management Plan model is part of WIC's Business Continuity Plan Guide. Business unit Crisis Management plans should address, but not be limited to:

- Scope a definition of the Crisis Management Plan scope, i.e., local, regional, corporate.
- Possible Crisis a site-specific list of crisis events if different from the contents of the corporate model.
- **Team Roster** a list of primary Crisis Management Team (CMT) and sub-team members and alternates.
- Notification Lists a call tree for the CMT, management, Plant Emergency Organizations, outside responders, etc.
- Crisis Management Center identification of a CMC location and alternate site(s).

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- Resources a list of CMT and CMC equipment, where it is located, and who is accountable for its maintenance.
- Communication a point of contact and strategy to communicate timely, accurate information to all stakeholders.
- **Prevention** Proactive plans and description of pre-incident measures to manage risk or lessen incident impact.
- Response Plans and strategies for initial crisis response to protect people, property, share value, public image.
- **Resumption** Plans and strategies to resume time-sensitive operations following a disaster.
- Recovery Plans and strategies to recover less time-sensitive operations following a disaster.
- Restoration Plans and long-term restoration strategies leading to normal business operations.
- Plan Exercises a definition of annual plan test protocol or tabletop exercise and corrective action measures.
- Plan Maintenance appointment of a Business Continuity Coordinator accountable for plan updates.
- Appendices Site maps, drawings, call lists, or other plans addressing a specific crisis topic as required.

"Note In certain scenarios, for example a fire in a high-value business location; it will be both possible and effective to develop these plans. In other scenarios, it is sufficient to recognize the distinguishing features of each phase.

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8.0 CRISIS MANAGEMENT TEAM ROLES

Corporate Crisis Management Team					
Person	Role and Responsibility				
CEO	■ Ultimate Corporate Crisis Management Decision Making Authority.				
CRO	 Corporate Business Continuity Plan owner & Head of Corporate CMT. Alternate communicator to the Board of Directors 				
Head of Legal Affairs	 Corporate Crisis Management Team Member. Direct Legal, Investigation, & Police liaison. 				
Specialist Support required	Risk Management, IT Security.				
Sub Crisis Management Team	As per the natural of Crisis.				

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APPENDIX E — CRISIS COMMUNICATIONS POLICY

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1.0 INTRODUCTION Crisis Communications is a key element of crisis management and is designed to communicate timely, accurate information to all WIC stakeholders and the media during any local, regional, or global crisis. While crises are unpredictable, advanced communications planning can positively impact media perceptions, employee reactions, investor confidence, and ultimately minimize business disruptions.

2.0 POLICY WIC 's Crisis Communications Policy, part of its Business Continuity Policy (1.0) and Crisis Management Policy (1.3), is to take all reasonable and appropriate steps necessary to ensure designated staff effectively communicates timely, accurate information to all appropriate WIC's stakeholders during any significant unplanned event affecting its business, reputation, people, or property. Global Communications coordinates all crisis communication; however, crisis communication planning to minimize the impact of natural or human-caused events and ensure the company's success is the responsibility of designated WIC communicators.

3.0 PURPOSE & SCOPE This policy provides guidelines for development of crisis communications plans, as well as the maintenance and testing of such plans. Reporting to the Crisis Management Team (CMT) led by the President, all businesses must develop, maintain and exercise Crisis Communications plans as part of their Crisis Management plans, consistent with the Business Continuity Planning Policy and Crisis Management Policy.

4.0 DEFINITION the WIC's Crisis Management policy states that a crisis at WARBA is any global, regional or local incident or situation that runs the risk of:

- causing harm to people or damage to property or the environment
- escalating in intensity, or adversely impacting shareholder value of the company's financial position
- falling under close unsolicited media, government or regulatory authority scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- Jeopardizing the positive public image of the company, its brands and its officers or employees.

5.0 PHASES ACBMS's Business Continuity and Crisis Management policies divide crisis events into five phases:

- Prevention Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- Response Planning and execution of initial crisis response to protect people, property, share value, and public image.

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- Resumption Planning and execution of strategies to resume time-sensitive operations following an
 event.
- Recovery Planning and execution of strategies to recover less time-sensitive operations following an event.
- Restoration Planning and execution of long-term restoration strategies leading to normal business operations.

Crisis Communication focuses on the Prevention and Response phases since Resumption, Recovery, and Restoration relate to long-term rebuilding of assets lost in a natural or human-caused event. Crisis Communication phases include:

- Assess Assess the crisis severity and scope with the CMT to gauge communications needs, tools and timing.
- Notify Notify key constituents of the crisis in a timely fashion (within one hour depending on the level of crisis).
- Inform Communicate with key internal and external audiences, providing news and updates.
- Respond Provide timely response to inquiries from the media and other stakeholders.
- Record Track and record inquiries and outgoing information.
- Collect Gather copies of articles, interviews, media, etc., resulting from the incident/situation.
- Evaluate Evaluate the execution of crisis communication plans and implement process improvements.

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6.0 PLAN A Crisis Communications Plan, incorporated in all Crisis Management Plans shall include, but is not limited to:

- **Scope** a definition of the scope of the plan (local, regional, corporate)
- Crisis Communications Team Roster a listing of individuals from various departments with responsibilities for implementation of the plan
- Crisis Gauge criteria used to determine the potential impact of the crisis, level of disclosure, resources and assets needed.
- Notification Procedure and Communication flow a chart outlining the communications flow within the scope of the plan.
- Target Audiences all potential internal/external audiences with whom communication may or may not be appropriate.
- Media Policy guidelines to ensure that designated, trained spokespeople communicate with the media.
- Records guidelines for maintaining detailed and comprehensive records about the event and the information flow.
- Communication Tools and Templates samples of communication tools (i.e., standby statements, key messages, fact sheets, press releases, potential questions and answers) adaptable to the situation.
- Crisis Communication Exercises an outline for periodic testing of Crisis Communication plans in a mock crisis.

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7.0 CATEGORIES and **VULNERABILITIES** WIC's Business Continuity and Crisis Management policies identify five crisis categories (shaded areas). Each category has numerous vulnerabilities illustrated by the examples provided.

Business - An incident that adversely impacts WIC's competitive position. tarnishes its reputation or brand names or reduces workforce morale and productivity.

- Loss of significant trade partner
- Product failure resulting in injury or death
- Product failing to meet requirements, negative publicity
- Product recall
- Government regulatory compliance
- Charges of fraud or unethical behavior by an individual
- Charges of fraud or unethical behavior by WIC
- Labor dispute, union strike, work slowdown or stoppage
- Corporate, office or business shutdown or closure

- Acts of war or terrorism
- Financial mismanagement
- Re insurance, medical Providers or Supply chain disruption.
- Serious legal issue, i.e., litigation, criminal activity
- Significant negative media and/or Internet coverage Offensive advertising
- Regional currency or other political crisis
- Hostile corporate takeover, merger or other major reorganization
- Worker layoff

Information - The unauthorized disclosure or compromise of WIC CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.

- Customer information compromise
- Personnel information compromise
- Financial performance information compromise
- Pricing information compromise
- Research or new product design compromise
- Industrial espionage

- Product or marketing plan information compromise
- Loss of trade secrets or trademark infringement
- Proprietary process or system information compromise
- Merger or acquisition plan compromise
- Stolen laptop with highly confidential information

Information System - An incident or threat that affects information systems confidentiality, integrity, or availability

- Virus or other malicious code attack
- Denial of service attack
- Compromise of system confidentiality via hacker attack
- Password file loss
- Electronic crimes unspecified other

- Compromise of consumer credit files in ecommerce.
- Loss of production, order processing, warehousing,
- Logistics, accounts payable or receivable, payroll, etc.
- Data center power failure, fire or another incapacitation.

People - An incident that affects the safety, security or productivity of WIC staff.

- Death or serious injury that is work-related
- Workplace violence
- Bomb threat
- Executive group tragedy, i.e., plane crash
- Senior management death or serious injury
- Substance abuse

- Random street crime, i.e., mugging, robbery
- Sabotage
- Terrorism involving an employee or company facility
- Political unrest involving employees or families
- Breach of privacy

Property - A natural or human-caused event affecting the facilities or operational continuity of WIC or its suppliers, trade channels, and joint venture partners, subsidiaries and affiliates.

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- Natural disaster (hurricane, flood, earthquake, tornado)
- Severe weather (thunderstorm, heavy snow, ice storm)
- Fire or explosion
- Roof collapse
- Facility intrusion

- Human-caused industrial accident
- Environmental hazard mishandling wastes
- Chemical spill or air pollution
- Ground water contamination
- Vehicle accident or significant cargo loss

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APPENDIX E — CRISIS COMMUNICATIONS PLAN

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INTRODUCTION

Without any breaches to the Disclosure policy terms ,Crisis Communications, a vital part of crisis management, is a strategy to communicate timely, accurate information to appropriate WIC's stakeholders and the media during any local, regional or global crisis. WIC is vulnerable to any number of potential crises that could have a negative impact on the company. Most crises are unpredictable; however, advanced planning to communicate effectively during a crisis can positively impact media perceptions, employee reactions, investor confidence and ultimately, business interruptions.

It is WIC 's policy to take all reasonable and appropriate steps necessary to ensure designated staff effectively communicate timely, accurate information to all appropriate WIC's stakeholders during an event affecting its business, reputation, people, or the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Global Communications coordinates all crisis communication; however, crisis communication planning to minimize the impact of natural or human-caused events and ensure the company's success is the responsibility of all WIC's staff.

SCOPE

In accordance with the Crisis Communication Policy, this plan describes how WARBA insurance Company will handle the communications in the event of a crisis. Although specific to the plan WARBA's follows the framework provided in the Policy. This plan is used in conjunction with the Crisis Management Policy, under the overall umbrella of the Business Continuity Policy. This plan is to be used at any time a crisis is directly related to this business and is localized to (the name of site/region/business unit?). Additionally, this plan serves as the local component to support any crisis of a corporate or global nature where support and communications by (this business) is necessary.

DEFINITION OF CRISIS

The WIC Crisis Management policy states that a crisis at WIC is any global, regional or local incident or situation that runs the risk of:

- Escalating in intensity, or adversely impacting shareholder value of the company's financial position
- Causing harm to people or damage to property or the environment
- Falling under close media or government scrutiny
- Interfering with the normal business operations
- Wasting management time and/or financial resources
- Affecting employee morale
- Jeopardizing the positive public image of the company and its officers.
- Any other events considered as a Risk.

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CRISIS COMMUNICATIONS TEAM

The Crisis Communications Team (CCT) is a group of individuals with specific responsibilities in the event of a crisis. The purpose of the team is to work closely with the Crisis Management Team (CMT) to assess the initial report of the crisis, gather information, disseminate information to appropriate stakeholders, work with the media and monitor the information flow throughout the duration of the crisis. Team members work together to bring closure to the crisis, monitoring any follow up issues and managing ongoing media interest. The CCT meets at least biannually to review its responsibilities and update this plan. Some team members may vary, depending on the nature of the crisis, however the core team remains as identified herein.

The **Crisis Communications Team** for (WARBA INSURANCE COMPANY) consists of (Suggested titles/positions - each business to identify specific individuals and tailor as needed)

- Crisis Communications Manager (the senior global communications professional for the business) -Overall responsibility for media and stakeholder communications: this is the designated spokesperson for (business), works closely with Crisis Management Team Manager
- Communications Coordinator Supports the needs of the Crisis Communications Manager, ensures the communications flow is followed assists with the writing of press releases, statements and gathering information.
- Compliance Manager ensure that all written / verbal Communications are complying with the Governmental rules.
- Legal Counsel Reviews legal implications of the situation and provides review, as appropriate, to written and verbal communications issued
- Secretary Coordinates distribution of documents (printing, production, mailings) maintenance and distribution of reports, handles receives incoming calls and other clerical, duties.

(Business prepares a graphic flowchart once individuals are identified) Depending on the business and the nature of the crisis: other areas to include on the team. Risk Management, finance, sales/marketing; public relations/advertising consultants.

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CRISIS GAUGE

In order to determine the potential severity of a crisis, a specific set of guidelines and criteria is utilized by the Crisis Management Team and the CCT. This assessment determines the level of disclosure about the situation, what human resources and communications resources need to be accessed, the timing on communications, media contact and other decisions.

(Expect that specific criteria be developed in Crisis Management Plans and can be discussed here? These criteria should include, but are not limited to:

What resources are required to manage the crisis?

Is it local, regional, or global?

Is it likely to generate local or broader media coverage?

Will it be of short or long duration?

What is the potential financial exposure?

What is the impact on employees? (Others to be added)

NOTIFICATION PROCEDURE AND COMMUNICATION FLOW

A critical component of the crisis communications plan is the flow of information, from the initial notification about the crisis, to the appropriate internal and external audiences. The crisis will first be reported to the Crisis Management Team (CMT) according to the Crisis Management Plan. The Crisis Communications Team (CCT) is notified immediately and the following procedure is followed:

- 1) Crisis Management Team immediately notifies Crisis Communications Manager
- 2) Crisis Communications Manager immediately assembles Crisis Communication Team.
- 3) Unavailable team members are notified using most immediate available tool (Mobiles/emails/WhatsApp's).
- 4) CCT reviews available information.
- 5) CCT notifies others (non-team members) as deemed appropriate.
- 6) CCT establishes media center (if necessary) and addresses communication logistics.
- 7) CCT begins to disseminate information to appropriate stakeholders and responds to media inquiries, according to media policy
- 8) CCT remains informed of updates on crisis by CMT
- 9) CCT updates media and other appropriate stakeholders (Compliance Manager & Legal Manager is a must) as needed and appropriate
- 10) CCT maintains records to track incoming inquiries and outgoing information.
- 11) CCT circulates copies of media coverage to GMT and other appropriate personnel

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TARGET AUDIENCES

The audiences may vary, depending on the situation. Potential audiences for consideration include:

- Employees and their families.
- Media (local, regional, national, international) (list of specific local/regional/business media covering this business is an attachment to the plan)
- Shareholders.
- Site neighbors and community leaders.
- Trade partners/vendors.
- Customers.
- Government/regulators.

Methods of communication with these audiences may include:

Internal Audiences: (business to specify most appropriate depending on crisis): Face-to-face, email, memo, bulletin board, video bulletin board, and internet.

External Audiences: press briefings, press releases, website, letter, advertising), and emails.

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MEDIA POLICY

In accordance with company policy, all contact with the media shall be through WARBA Insurance Company the representative of Global Communications with responsibility for WARBA Insurance Company. (Mr. Chairman, Mr. CEO, Head of Marketing) is also the Crisis Communications Team Manager and has completed crisis communications training. Any call from the media received by any WIC's employee will immediately be passed on to (Manager). Depending on the nature of the event, the CMT and the CCT may determine that an additional spokesperson (or people) with certain expertise may be required. These additional spokespeople will be identified and guided by the CCT and the CMT.

All spokespeople adhere to these basic guidelines for working with the media.

- 1) Only agreed upon spokesperson/people talk to the media
- 2) Maintain a comprehensive log of inquiries and responses (contact info and nature of inquiry)
- 3) If information is unknown or unavailable, agree to get back to media contact
- 4) Be cooperative and show compassion
- 5) 'NO COMMENT' is not an option
- 6) Use prepared, approved statements as needed
- 7) Do not speculate, guess or give false information
- 8) Avoid jargon
- 9) Deliver key messages whenever possible
- 10) Nothing is off the record"
- 11) Choose interview locations carefully.

RECORD KEEPING

Comprehensive records will be kept about the crisis and the information flow. The records are used to inform others, track the flow of communications, maintain facts about the situation, list media contacts, etc. A media monitoring company will be engaged to collect coverage. Attached to this plan are sample forms:

- Telephone log used to record initial report of crisis and all subsequent calls pertaining to the crisis.
 This includes calls to and from the media as well as to and from other stakeholders. Names, dates, time, phone number and details of call to be included in record (email inquiries also tracked).
- Forms on which to list media coverage, including date, media, contact, and a summary of the report (a copy of the article/transcript of audio attached for the record).
- Copies of all outgoing communications issued by "WIC" with a list of recipients.

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COMMUNICATIONS TOOLS AND TEMPLATES

Attached to this plan are samples of communication tools that can be adapted to the various situations. The tools and templates include:

- Sample standby statements.
- Sample press releases.
- Potential questions.
- Company fact sheets.
- Key messages.

CRISIS INFORMATION CENTER/SUPPORT FACILITIES

The (WARBA's Head Office) will be used as the Crisis Information Center. If offsite facilities are require will be utilized. This facility is separate from the Crisis Control Center and will be the location for press briefings and on-site media interviews. The Logistics Manager and Secretary will assume responsibility for equipping the room with telephones, computers, tables, chairs, podium, audio/visual equipment, coffee and refreshment station, and other equipment as may be needed.

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