

# **Anjali Capital Markets**

## **DISASTER RECOVERY PLAN**

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# **1. Objectives of the Disaster Recovery Plan**

The purpose of Anjali Capital Markets (the “Company”) Disaster Recovery Plan (the “Plan” or “DRP”) is to ensure that in case of material business disruptions the Company resumes its operations with minimal interruptions and in the most efficient manner possible. The DRP covers all systems and functions critical for efficient operation of the Company.

The DRP, as well as any changes and/or modifications to DRP, are reviewed and approved by the Company’s Board of Directors (hereinafter referred to as “Board”).

Among other, the Company will maintain and make available to all relevant employees the following information within the context of DRP framework:

A “disaster” is generally defined as the occurrence of any event that causes a significant disruption in business capabilities. The central theme of the Plan is to minimize the effect a disaster will have upon ongoing operations.

The DRP is a systematic guide from disaster to recovery. The basic approach, general assumptions, and sequence of events that need to be followed will be stated clearly in the documentation that follows. While using the Plan during a severe disruption, it may be in the best interests of the Company to modify directions for many reasons. All alternative actions should be documented, and as soon as appropriate, the Plan should be resumed, and revisions made as appropriate. The Plan will be distributed to all key personnel at all locations, and they will receive periodic updates. The Plan is to be maintained in each office of the Company, including any branch offices, and offsite at the homes of all key personnel. The general approach is to make the plan as threat independent as possible. This means that it should be functional regardless of what type of disaster occurs.

# **2. Assumptions of the DRP**

- i. Recovery from anything less than complete destruction will be achievable by using the Plan.
- ii. Normally, available staff members may be rendered unavailable by a disaster or its aftermath or may be otherwise unable to participate in the recovery.
- iii. Procedures are sufficiently detailed so that someone other than the person primarily responsible for the work can follow them.
- iv. Recovery of a critical subset (recovery workload) of the Company’s critical functions and applications systems during the recovery period will allow the unit to continue critical operations adequately.
- v. A disaster may require clients to function with limited automated support and some degradation of service, until full recovery is made.

- vi. The writing of special purpose programs may be required to enable the Company to effectively return to normal conditions. That is to say, the Company may need to first rebuild and/or re-enter data that was lost between the time of the last off-site backup and the time of the disaster/disruption; and secondly, enter transactions that accumulate during the period of “no automated support”.

### **3. Disaster Recovery Arrangements**

The Company’s business processes are composed of as follows:

- i. Corporate Networking – This encompasses the data and voice networking, including servers, workstations and phones. Such services will be rendered from reputed telecom service providers.
- ii. Trading Software – The Company will take services of MetaQuotes Ltd, MT5 trading software. The company maintains its own disaster recovery plan.
- iii. Business Systems & Backups – This encompasses the business processes, including processing of client accounts, scanning/imaging and storing of documents both on-site and off-site, customer care and help desk. All documents required to be retained according to applicable legislation will be scanned onto servers. Daily backup of that server will be provided as well.
- iv. Technology and Infrastructure – The company shall have in place the right technology and tools are essential, including an infrastructure that supports its business needs. All officers of the company will have their personal laptops and phones to access day-to-day business operations, and a reputable telecom provider will be appointed for internet services. The Company will engage useful tools such as: Microsoft Teams, Zoom, Google Drive and Microsoft OneDrive for Business.

### **4. Criteria for Invoking the DRP**

Customers shall assume the risk of financial loss caused by the failure of information, communication, electronic and other systems.

When executing trading operations through the Client Terminal, the Customer shall assume the risk of financial loss, which can be caused by:

- i. the failure of the Customer's hardware, software and internet connection.
- ii. the improper operation of the Customer's equipment.
- iii. the wrong settings in the Client Terminal.
- iv. delayed Client Terminal updates; and

- v. the Customer's ignorance of the applicable rules described in the user guide for the Client Terminal and in the Help section.

The Customer acknowledges that at the moment of peak load there may be some difficulties in getting telephone communication with a company representative, especially on the fast market (for example, when key economic indicators are released).

The Customer acknowledges that under abnormal market conditions, the execution time for Customer Instructions may increase.

## **5. Role of DRP Team**

The Disaster Recovery Team shall personally visit the corporate office or any branch office which has been the subject of a disaster and make an initial determination of the extent of the damage or technology outage. Based on their assessment, all or part of the Disaster Recovery Plan will be initiated.

The team will decide:

- i. If normal operations can be continued at the site and repairs can be started as soon as possible. This may be an option where the following is evident:
  - Minor Damage - Processing can be restarted in a short time with no special recall of personnel.
  - Anticipated downtime is less than one day.
  - The damage could have been to hardware, software, mechanical equipment, electrical equipment, or the facility.
- ii. If normal operations can be continued or restarted with the assistance of only certain recovery teams. This may be an option where the following is evident:
  - Major Damage - selected teams will be called to direct restoration of normal operations at current site.
  - Estimated downtime is two to six days.
  - Major damage to hardware or facility.
- iii. If limited operations can be continued at the site and plans started to repair or replace unusable equipment.
- iv. If the facility is destroyed to the extent that an alternate facility must be used:
  - Catastrophe - Damage is extensive.

- Restoration will take upwards from one week.
- The computer room or facility could be completely destroyed.
- All personnel will be called to begin the total implementation of the Company's Contingency Plan.

The Company has subscribed to a Professional Indemnity Insurance of US\$250,000.

## **6. Communications to Essential Parties**

- i. A member of the Disaster Recovery Team shall contact all employees and officers of the Company. In addition, certain third parties shall be contacted by a member of the Disaster Recovery Team as are necessary. A list of all employees and third parties to be contacted will be maintained by each member of the Disaster Recovery Team both on and offsite.
- ii. In the event that the Company's staff or departments ordinarily assigned to perform certain critical functions are unable to do so, their duties will be reassigned as promptly and as practicably possible.
- iii. This DRP is to be reviewed and documented annually.
- iv. The Company will test the following areas of its systems on an annual basis to ensure that, in the event of a catastrophe or other disaster, no data vital to the Company's operations is lost.
- v. All testing of the aforementioned systems will be conducted by the person in charge of Information Technology.