

**Adopted by the Directors  
of GLOBALTRANS INVESTMENT LTD  
Resolution of 07 February 2008**

**GLOBALTRANS INVESTMENT LTD  
BUSINESS CONTINUITY POLICY**

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## **1.BACKGROUND**

### **Objectives**

As a result of Globaltrans Investment LTD (hereinafter GTI, or the Company) admission to trading on the London Stock exchange, GTI establishes the basic rules and procedures to comply with the continuing obligations set out in "UK Listing Authority" ("UKLA") Listing Rules.

The primary goal of current policy is to determine an approach of business continuity management (hereinafter BCM) for companies of the GTI group.

### **Scope**

This document has been developed in accordance with the Company's business objectives and states the Business Continuity Policy to protect resources including people, data, infrastructure, applications, and reputation of the Company during and after emergency.

This Policy applies to all Companies of the Group.

### **Confidentiality**

All of the information contained in this document is considered "For internal use only".

### **References**

The approach employed in the development of business continuity policy is consistent with best practices and accepted standards, such as:

- BSI's business continuity management standards - BS25999-1 and BS25999-2;
- ISO 27001 information security management standard;
- CobiT (Control Objectives for Information and related Technology).

## **2.ROLES AND RESPONSIBILITIES**

- Senior management (or Management Board, hereinafter MB) establishes and oversees business continuity management processes and approves significant decisions related to business continuity preparedness status.
- MB is the owner of the business continuity and disaster recovery processes.
- BCM manager (appointed by MB) and heads of departments are responsible for business continuity decision-making. In the case of unavailability of BCM manager, his/her duties are performed by the deputy BCM manager (also appointed by MB).
- BCM manager is responsible for business continuity policy, business continuity plans (hereinafter BCP) and other business continuity documentation maintenance and up-to-date state of the documentation.
- Heads of departments are responsible for critical business processes recovery and disaster recovery plans (hereinafter DRP) maintenance.
- All Company employees must meet requirements covered in this policy.

## **3.BUSINESS CONTINUITY POLICY**

### **Key Business Continuity objectives**

The primary objectives during a crisis:

- ensuring safety of employees and human life;
- continuity of time-critical services;
- minimization of disruptions to clients and partners;
- minimization of operational and financial impact, and impact on reputation.

## **Ensuring Business Continuity**

- Management and staff should be familiar with Company business operations, supporting technologies, BCP and relevant recovery procedures.
- All employees involved in BCP related activities should have read and understood BCP contents in order to facilitate a timely response to any significant interruption of Company normal business operations and services.
- Business units (hereinafter BU) leaders should ensure that:
  - all business related documentation, files, forms, internal and external contact details and other relevant information necessary for resumption and recovery of BU operations are backed up and/or scanned on an 'as required' basis, stored/located off-site and up-to date;
  - correspondent recovery procedures are in place for time-critical business processes and these procedures are up-to-date.
- Each BU Leader is responsible for restoration of critical business function to a minimum acceptable level during a recovery period.
- In the case of IT outage, business units should work manually until correspondent IT resources will be recovered.
- HR leader should ensure that staff contact details are up-to-date and available for relevant Company parties.
- All critical data must be stored on centralized file servers. IT Department provides backup services and guarantees data restoration in the case of a failure. Data will be recovered from latest available backup. End-users' workstations are not subject for backup unless special agreement with IT Department and approval of BCM Manager are in place.
- All proposed critical changes in business processes or supporting technologies (e.g. implementation of a new system) must be analyzed on possible impact to provision of Business Continuity and also submitted to and approved by BCM Manager before implementation. All such changes should be carefully planned and scheduled (for example, on timeframe allowing recovery and roll-back in case of something is going wrong. Correspondent recovery and roll-back solutions should be prepared.
- All suppliers and outsourcing contracts for provision of key services (including non-IT) must be analyzed with respect to their possible impact to Business Continuity and also submitted to and approved by BCM Manager before contract signing.
- In the case of a disaster/emergency all external communications including media activities should be coordinated and authorized only by MB. Other personnel should not talk to anyone outside of Company (e.g. press, competitors).
- Individuals must immediately report any revealed failures/outages, as well as breaches or weaknesses in business continuity or information security areas to BU leaders, BCM Manager or IT Helpdesk.

## **Training and Awareness**

Each BU leader should ensure that staff engaged on business continuity activities has the appropriate training and knowledge. This includes awareness of BU structure, functions and disaster recovery plan and recovery procedures. Formal training on business continuity should be also considered and provided for key personnel involved into business continuity management processes.

BCM Manager schedules and organizes workshops or awareness programs addressing BCP and related issues on a regular basis. These workshops should be conducted no rarely than annually and after any major business or technology change as well as after testing of the plan. These trainings are to be approved by MB.

## **Maintaining and Testing the Plan**

Maintenance and testing of the Business Continuity Plan is under ultimate responsibility and control of MB.

Each BU leader should ensure that BCP is periodically reviewed and tested and, if necessary, updated to reflect changes in staffing, business processes, organizational structure, and recovery requirements. The testing process should verify that BCP is up to date and meets BU requirements.

Testing of the plan and related recovery procedures is to be scheduled and organized by the BCM Manager on a regular basis. Tests should be conducted no rarely than annually (or after any major business or technology change).

Results of testing are to be reported by BU leaders to BCM Manager, reviewed by BCM Manager and, next reported by BCM Manager to MB for approval.

MB approves selected procedures to be tested, tests schedules, results and corrective actions (if any) required to be taken.

### **The set of Business Continuity Management documents**

The Company Business Continuity Plan consists of:

- GTI Business Continuity Policy;
- GTI Business Continuity Strategy;
- NPK Business Continuity Plan;
- NPK Disaster Recovery Plans;
- STT Business Continuity Plan;
- STT Disaster Recovery Plans.

The electronic version of BCP and supported files are located on the Companies' file-servers.

The hard copies of BCP, including compact discs with BCP files, are hold both on-site and off-site.

## **4.POLICY COMPLIANCE AND MONITORING**

Company reserves the right to control compliance with this Policy. Disciplinary action arising from breach of this Policy will be taken according to Company's established disciplinary code and procedures.

Individuals become aware of any non-compliance with the policy should report them to BCM manager.

BCM manager reports to MB on business continuity issues (including cases of non-compliance with the policy) as well as "performance improvement opportunities" on an annual basis.

## **5.MANAGEMENT REVIEW AND TESTING**

The Business Continuity Policy, related procedures and documentation are reviewed and updated on an annual basis or after any major business or technology change to ensure compliance with current business requirements.

The Business Continuity Policy, related procedures and documentation are subject to independent annual review.

Any proposed changes to this Policy are subject for BCM Manager's review, update and MB's approval.