





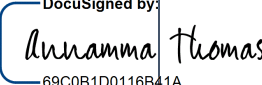
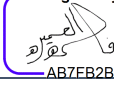
# Silal Group BCMS Policy

**RESTRICTED**

## Silal Group BCMS Policy

**Document Control Sheet**

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## SILAL Group BCMS Policy

**Revision Record**

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0.1			NA	16-Aug-2023	
0.2			Organization structure and legal regulations	19-Sep-2023	
1.0			NA	23-Oct-2023	
1.1			Addition of ADCMC Preparedness Framework & responsibilities of Internal Audit	22-Apr-2024	
1.2			Annual BCMS policy full review- compliance requirements & org updates	15 <sup>th</sup> Aug, 2025	



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## 1.0 Purpose

The purpose of this Group BCMS Policy is to:

- Establish a unified approach, scope, and governance framework for BCMS implementation across Silal Group.
- Define the roles and responsibilities for business continuity management at both the Group holding level and individual subsidiary levels.
- Ensure the alignment of BCMS objectives with the strategic mission, vision, and operational needs of Silal and its entire portfolio of companies.
- Provide a foundational policy under which each subsidiary will develop and maintain its own detailed Business Continuity Management (BCM) documentation.
- Ensure compliance with relevant national and international BCM standards and regulatory requirements applicable to the Group.

## 2.0 Scope

This Group BCMS Policy applies to all entities under the Silal umbrella, including:

- Silal (Holding Company)
- SAFCO
- Al Bakrawe Holding
- Sherwood
- Terminex

Any future entities or joint ventures that become part of the Silal Group.

The scope of the BCMS covers the delivery of all products, services, and critical functions at predefined levels following a disruptive incident, across all operational locations and facilities managed by the Silal Group within the UAE and beyond. This includes all personnel, operations, facilities, equipment, key third-party relationships, and supporting information systems vital to the Group's continuity.

### 3.0 Abbreviations, Terms and Definitions

Acronym	Full form	Definition
<b>BCM</b>	<b>Business Continuity Management</b>	A holistic management process that identifies potential threats to an organization and the impacts to business operations, if realized, might cause a framework for building organizational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value creating activities.
<b>BCMS</b>	<b>Business Continuity Management System</b>	A management system to manage overall business continuity.
<b>BCP</b>	<b>Business Continuity Plan</b>	A documented collection of procedures and information that is developed, compiled, and maintained in readiness for use in an incident to enable an organization to continue to deliver its critical products and services at an acceptable predefined level.
<b>BIA</b>	<b>Business Impact Analysis</b>	A process that organizations use to analyse the effect a business disruption could have on activities that support the provision of products and services. The results of this analysis are used to set business continuity and recovery priorities, objectives, and targets.
<b>DR</b>	<b>Disaster Recovery</b>	Procedures for recovering IT infrastructure and data from any business disruption.
<b>MTPOD</b>	<b>Maximum Tolerable Period of Disruption</b>	The maximum period whereby an organization's activities can be disrupted without resulting in unacceptable consequences.
<b>RPO</b>	<b>Recovery Point Objective</b>	The point to which information used by an activity must be restored to enable the activity to operate.
<b>RTO</b>	<b>Recovery Time Objective</b>	The period following an incident within which a product or service must be resumed, or resources recovered.

### 4.0 Responsibilities

<b>Group Chief Executive Officer</b>	Overall accountability for the effectiveness of the Group BCMS.
<b>BCM Committee</b>	Approves the Group BCMS Policy and provides strategic oversight for all BCMS activities.
<b>Group BCM Lead:</b>	Responsible for the development, implementation, maintenance, and continuous improvement of the Group BCMS Policy and framework. This includes coordinating BCM activities across the subsidiaries and ensuring alignment.
<b>Subsidiary Management</b> (MDs/CEOs of SAFCO, AlBakrawe, Sherwood, Terminex & Future Subsidiaries)	Responsible for the effective implementation of this Group BCMS Policy within their respective entities. This includes developing, maintaining, and testing subsidiary-specific BCM documentation (e.g., BIAs, BCPs, DR plans, procedures) that align with the Group policy and standards.
<b>All Employees:</b>	Expected to understand their roles in BCM and comply with established procedures and plans.

(Find RACI & Org Chart in Appendixes A & B)

## 5.0 Policy

### 5.1 Policy Statement

Silal, as a leading diversified food and Agri-tech holding company, along with its subsidiaries (SAFCO, Al Bakrawe Holding, Sherwood, and Terminex) is committed to establishing and maintaining a robust Business Continuity Management System (BCMS). This holistic Group BCMS Policy serves as the overarching framework to ensure the resilience of all group operations, critical processes, and service delivery in the face of disruptive incidents. We are dedicated to protecting our people, assets, brand, and the continuity of essential services, thereby contributing to national food security and sustainable growth across the group.

### 5.2 Policy Application and Compliance

This policy is applicable to all employees, contractors, third parties, and joint venture partners across the entire Silal Group. Compliance with this policy is mandatory and is overseen by the Group Chief Executive Officer and the respective Managing Directors/CEOs of each subsidiary.

### 5.3 Policy Objectives

The Group BCMS objectives, applicable across all Silal Group entities, are to:

- Ensure the safety and well-being of all human resources across the Group.
- Maintain the availability of strategic food reserves and critical supplies managed by the Group and its subsidiaries.
- Ensure the continuity of critical products and services at stated minimum levels following a disruptive incident, minimizing impact on customers and stakeholders.
- Comply with all relevant laws, regulations, and contractual obligations.
- Safeguard the Group's assets, information, and reputation.
- Continuously improve the Group's resilience to disruptions.

### 5.4 Context of Organization

The Group BCMS is established by taking into consideration the organizational context, which includes identifying and understanding internal and external issues that are relevant to Silal Group's purpose and that can affect its ability to achieve the intended outcomes of the BCMS. This includes, but is not limited to, factors arising from:

- **Internal Issues:** Organizational structure, culture, capabilities (e.g., people, knowledge, processes, systems), performance, and past incidents or audit findings.
- **External Issues:** Social, economic, environmental, technological, political, legal, and competitive factors, as well as contractual obligations, market conditions, and the expectations of interested parties (e.g., customers, regulators, suppliers).

Group BCMS also involves the ongoing determination of relevant risks and opportunities associated with these issues and the context of the organization, with a commitment to address these through appropriate planning and actions.

Specific considerations include:

- **Contractual obligations:** Ensuring continuity of supply agreements and service contracts.
- **National Food Security initiatives:** Aligning with the UAE's strategic objectives for food resilience.
- **Legal and regulatory compliance:** Adhering to relevant UAE regulations (e.g., TDRA UAE IA Regulation, NCEMA 7000:2021) and international standards (e.g., ISO/IEC 22301:2019).
- **Reputational requirements:** Protecting the Group's brand and stakeholder trust.
- **Event response:** Establishing effective response mechanisms for disruptions.
- **Mergers and Acquisitions:** Integrating new entities into the Group BCMS framework.
- **Best practices:** Continual improvement based on national and international BCM best practices.

## 5.5 Policy Review and Update

This Group BCMS Policy will be reviewed and updated at least annually, or more frequently as necessitated by significant organizational changes, incidents, or changes in regulatory requirements. The review process will be led by the Group Business Continuity Lead, in consultation with the Group CEO, subsidiary management, and other relevant stakeholders, with final approval from the Business Continuity Management Committee.

## 5.6 Subsidiary BCM Documentation

In accordance with this Group BCMS Policy, each Silal Group subsidiary (SAFCO, Al Bakrawe Holding, Sherwood, Terminex, and any future additions) is mandated to develop, implement, and maintain its own detailed BCM documentation. This documentation shall include, but not be limited to:

- Detailed Business Impact Analyses (BIAs) specific to their operations.
- Comprehensive Business Continuity Plans (BCPs).
- Disaster Recovery (DR) plans for critical IT systems and data.
- Emergency response procedures.
- Testing and exercise schedules.
- Training and awareness programs for their personnel.

All subsidiary specific BCM documentation must align with the principles, objectives, and requirements set forth in this overarching Group BCMS Policy.

## 6.0 Reference Standards:

ISO 9001:2015 Quality Management System (QMS) requirements

## 7.0 Documents / Records

N/A



## 8.0 Annex

### 8.1 Appendix A: RACI Chart for Group BCMS

This RACI chart outlines the roles and responsibilities for the key activities within the Silal Group's Business Continuity Management System.

Activity / Task	Group Chief Executive Officer (GCEO)	BCM Committee	Group BCM Lead	Subsidiary Management (MDs/CEOs)	Heads of Departments	All Employees
<b>1. BCMS Policy &amp; Framework Management</b>						
BCMS Group Policy Development / Revision	C	C	R, A	I	I	I
BCMS Group Policy Approval	A	R	C	I	I	I
BCMS Framework & Standards Definition (Group)	C	C	R, A	I	I	I
<b>2. BCMS Implementation &amp; Documentation</b>						
Overall Group BCMS Oversight	A	C	R	C	I	I
Subsidiary BCMS Implementation	I	I	C	R, A	R	I
Subsidiary Business Impact Analysis (BIA)	I	I	C	A	R	C
Subsidiary Business Continuity Plan (BCP) Development	I	I	C	A	R	C
Subsidiary Disaster Recovery (DR) Plan Development	I	I	C	A	R	C
<b>3. BCMS Operations &amp; Maintenance</b>						
BCMS Testing & Exercising (Group Level)	C	I	R, A	C	C	I
BCMS Testing & Exercising (Subsidiary Level)	I	I	C	A	R	C
BCM Training & Awareness (Group Level)	I	I	R, A	C	C	C
BCM Training & Awareness (Subsidiary Level)	I	I	C	A	R	C
Incident Management & Response (during disruption)	C	I	R, A	A	R	C
BCMS Performance Monitoring & Reporting (Group)	C	R	R, A	C	I	I
<b>4. BCMS Compliance &amp; Improvement</b>						
Compliance Monitoring (Group Level)	C	R	C	R, A	I	I
Policy Review & Update Cycle	C	C	I	R, A	I	I
Corrective Actions & Continual Improvement	C	I	A	R, A	R	C
<b>RACI Key:</b> <ul style="list-style-type: none"> <li>• <b>R - Responsible:</b> The individual(s) who do the work to complete the task. There should be only one Responsible for each task.</li> <li>• <b>A - Accountable:</b> The individual ultimately answerable for the correct and thorough completion of the deliverable or task, ensuring the Responsible completes the task. There should be only one Accountable per task.</li> </ul>		<ul style="list-style-type: none"> <li>• <b>C - Consulted:</b> Individual(s) whose opinions are sought, typically experts in the field. They provide input, and a two-way communication process is involved.</li> <li>• <b>I - Informed:</b> Individual(s) who are kept up to date on progress or decisions. They receive information, and a one-way communication process is involved.</li> </ul>				

8.2 Appendix B: Organizational Chart for Silal Group BCMS Implementation

