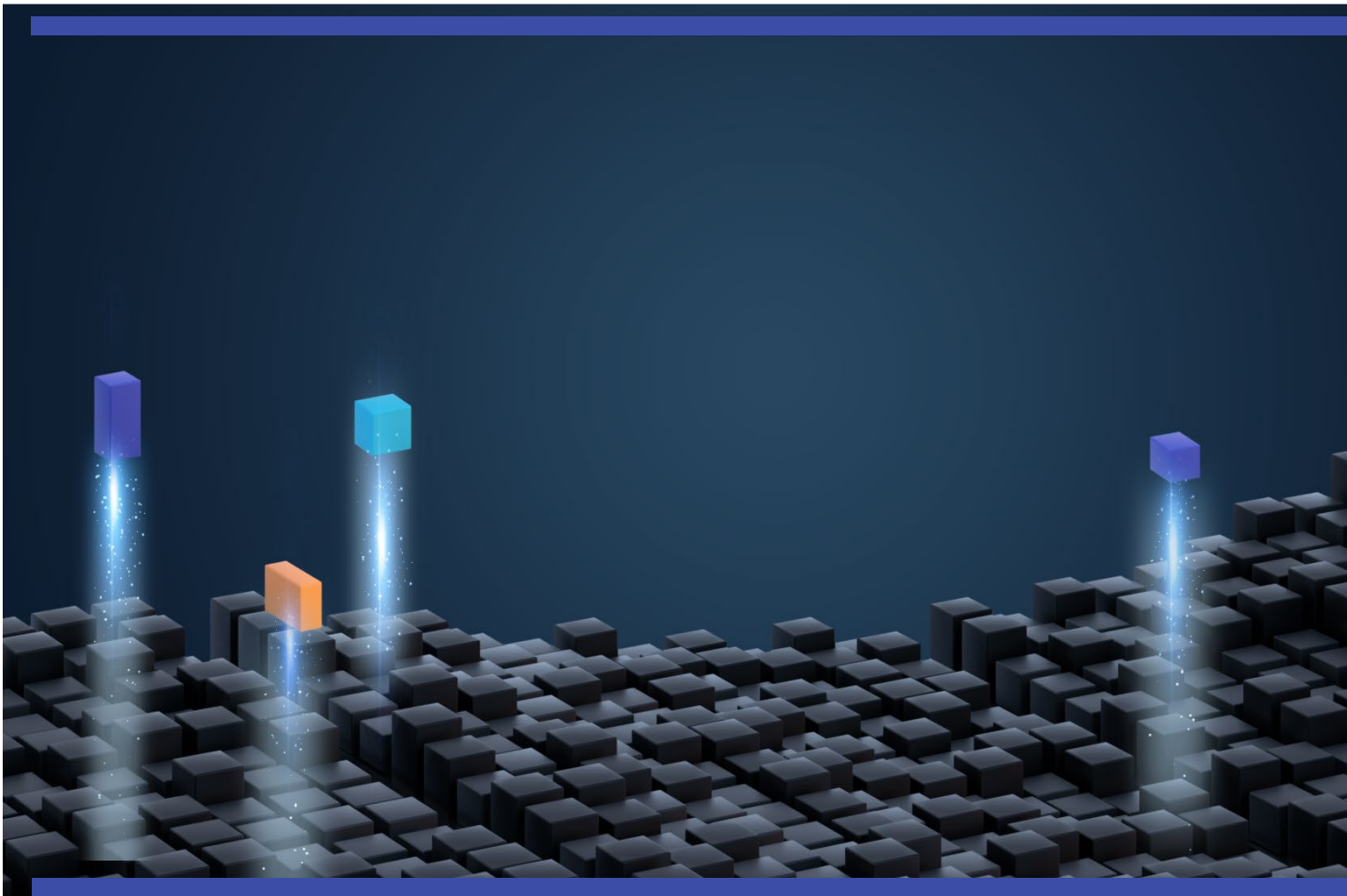


# Business Continuity Plan

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GLOBAL OPERATIONS



## Revision History

Date	Version	Changes Made	Author	Approver
June 12 2017	1.0.0	Based on OL, Inc BCP		COO
Nov 6 2017	1.0.0	Review for Risk Assessment		COO
Jan 21, 2019	1.0.1	Assessment	PG	HBO
August 30, 2019	2.0	Adaptation for Global operations	GS	HBO
Sept 16, 2019	2.1	Update of Appendix A	PG	HBO
Nov 21, 2019	3.0	Incorporation of crisis management process and addition of Pandemic Appendix	PG	HBO
Nov 25, 2019	4.0	Incorporation of Support Activities and Ticket Handling process	GS	HBO
Nov 25, 2019	4.1	Addition of Mission Statement to Introduction, update of Plan Distribution List	PG	HBO
Nov 26, 2019	4.6	Approved version	PG GS	HBO

Nov 15, 2020	5.0	Annual review, updates to telephone lists and Pandemic appendix	GS	COO
Mar 25, 2021	6.0	Annual review, updates to telephone lists and Pandemic appendix	GS	GS

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# 1 Introduction

## 1.1 Mission Statement

*“We at OpenLegacy recognize the need and responsibility to our employees and customers by being adequately prepared for and able to successfully recover from emergency situations by establishing mitigation measures, interim actions and a recovery strategy for a business disruption”.*

OpenLegacy utilizes the current industry standards, processes, and methodologies to ensure that our teams, clients, and partners can fully depend on:

**“OpenLegacy being there when they need us”.**

Our Customer Support Desk is cloud based, where our “follow the sun” regionally geographically disbursed support desks can effectively transition, takeover and take on all customer support needs as necessary, regardless of a regional or facility disruption.

This Business Continuity Plan is limited in scope to recovery and business continuance (Customer Support) from a serious disruption in activities due to non-availability of OpenLegacy’s facilities or personnel.

## 1.2 OpenLegacy Business Continuity Plan Assumptions

OpenLegacy utilizes the current industry standards, processes, and methodologies to ensure that our teams, clients, and partners can fully depend on OpenLegacy being **“There when they need us”**. This approach is further supported by:

- All our systems are cloud based (data storage, Admin, etc.) on several providers - Azure, GIT, etc., so there is no risk to our IP and corporate data in the event of a localized crisis or disaster.
- Our Project Delivery teams utilize SaaS based PSO (Professional Services Organization) tools.
- Our organization is decentralized, so there is no risk to management continuity in the event of a localized crisis or disaster.
- Our platform is based on open-source industry standards (e.g., Java, Spring, etc.) so there is no risk to our ability to continue development if any one 'supplier' ceases activity.
- Our knowledge is maintained in an organized system, so there is no risk of a 'brain drain' due to the unavailability of specific personnel.

We have mitigated major foreseen risks with the way we have structured OpenLegacy and its infrastructure.

## 1.3 OpenLegacy Business Continuity Plan Terms and Definitions

### Index of Acronyms:

- EOC** – Emergency Operations Center
- EMT** – Emergency Management Team
- ERT** – Emergency Response Team
- BCP** – Business Continuity Plan
- IT** – Information Technology
- RPO** – Recovery Point Objective
- RTO** – Recovery Time Objective

### Select Definitions:

**Recovery Point Objective (RPO)** describes the interval of time that might pass during a disruption before the quantity of data lost during that period exceeds the Business Continuity Plan’s maximum allowable threshold or “tolerance.” In other words, it answers the question – “Up to what point in time could the Business Process’s recovery proceed tolerably given the volume of data lost during that interval?”

**Recovery Time Objective (RTO)** is the duration of time and a service level within which a business process must be restored after a disaster so as to avoid unacceptable consequences associated with a break in continuity. In other words, it answers the question: “How much time did it take to recover after notification of business process disruption?”

## 1.4 How to Use This Plan

In the event of a crisis or disaster which interferes with OpenLegacy’s ability to conduct business from one of its offices, this plan is to be used by the responsible individuals to coordinate the business recovery of their respective areas and/or departments. The plan is designed to contain, or provide reference to, all information that might be needed at the time of a business recovery.

**Section I, Introduction**, contains general statements about the organization of the plan. It also establishes responsibilities for the testing (exercising), training, and maintenance activities that are necessary to guarantee the ongoing viability of the plan.

**Section II, Business Continuity Strategy**, describes the strategy that the Operations Department will control/implement to maintain business continuity in the event of a business or facility disruption. These decisions determine the content of the action plans, and if they change at any time, the plans should be changed accordingly.

**Section III, Recovery Teams**, lists the Recovery Team functions, those individuals who are assigned specific responsibilities, and procedures on how each of the team members is to be notified.

**Section IV, Recovery Procedures**, determines what activities and tasks are to be taken, in what order, and by whom to affect the recovery.

**Section V, Appendices**, contains the remaining information needed to carry out the plan. Other sections may refer the reader to one or more appendices to locate the information needed to carry out the Team Procedures steps.

## 1.5 Objectives

The objective of the Business Continuity Plan is to coordinate the recovery of critical business functions in the event of a disruptive crisis, or a facilities (office building) disruption or disaster. This can include short or long-term disasters or other disruptions, such as fires, floods, earthquakes, explosions, tornadoes, extended power interruptions, hazardous chemical spills, and other natural or man-made disasters. This also includes crises other than disasters, such as unexpected personnel loss, IT systems failure or civic unrest interfering with facility use.

**A disaster is defined as any destructive event that renders a business facility inoperable or unusable so that it interferes with the organization's ability to deliver essential business services. A crisis is a non-destructive event that interferes with the organization's ability to deliver essential business services**

**The priorities in a disaster situation are to:**

1. Ensure the safety of employees and visitors in the office buildings. (Responsibility of the ERT)
2. Mitigate threats or limit the damage that threats can cause. (Responsibility of the ERT)
3. Have advanced preparations to ensure that critical business functions can continue.
4. Have documented plans and procedures to ensure the quick, effective execution of recovery strategies for critical business functions.
5. Implement essential functionality at alternative location(s) as soon as possible.
6. Meet Recovery Time Objectives specified in Appendix B for Recovery Point Objectives as listed in Appendix B.

**The priorities in a crisis situation are to:**

1. Ensure the ongoing delivery of services to clients.
2. Mitigate the disruption to essential operations
3. Implement BCP preparations to ensure that critical business functions can continue.
4. Have documented plans and procedures to ensure the quick, effective execution of recovery strategies for critical business functions.



5. Implement essential functionality at alternative location(s) or with alternative personnel as soon as possible.
6. Meet Recovery Time Objectives specified in Appendix B for Recovery Point Objectives as listed in Appendix B.

The Operations Business Continuity Plan includes procedures for all phases of recovery as defined in the Business Continuity Strategy section of this document.

## 1.6 Scope

The Business Continuity Plan is limited in scope to recovery and business continuance from a serious disruption in activities due to non-availability of OpenLegacy's facilities. The Business Continuity Plan includes procedures for all phases of recovery as defined in the Business Continuity Strategy of this document. Unless otherwise modified, this plan does not address temporary interruptions of duration less than the time frames determined to be critical to business operations. The scope of this plan is focused on localized crises and disasters such as fires, floods, and other localized natural or man-made disasters, and crisis-level disruption of operational capacity. This plan is not intended to cover major regional or national disasters such as regional earthquakes, war, or nuclear holocaust. However, it can provide some guidance in the event of such a large-scale disaster.

## 1.7 Changes to the Plan/Maintenance Responsibilities

Maintenance of the Operations Business Continuity Plan is the joint responsibility of the Operations Management, Facilities Management, and the Business Continuity Coordinator.

### **Operations Management is responsible for:**

1. Periodically reviewing the adequacy and appropriateness of its Business Continuity strategy.
2. Assessing the impact on the Operations Business Continuity Plan of additions or changes to existing business functions, Operations procedures, equipment, and facilities requirements.
3. Keeping recovery team personnel assignments current, taking into account promotions, transfers, and terminations.
4. Communicating all plan changes to the Business Continuity Coordinator so that the BCP can be updated.

### **Facilities Management Department management is responsible for:**

1. Maintaining and/or monitoring offsite office space sufficient for critical Operations functions and to meet the Operations facility recovery time frames.

2. Communicating changes in the BCP that would affect groups/departments to those groups/departments in a timely manner so they can make any necessary changes in their plan.
3. Communicating all plan changes to the Business Continuity Coordinator so that the master plan can be updated.

**The Business Continuity Coordinator is responsible for:**

1. Keeping the organization's BCP updated with changes made to Operations facilities.
2. Coordinating changes among plans and communicating to Operations management BCP requirements and updates as needed.

## 1.8 Plan Testing Procedures and Responsibilities

Operations Management is responsible for ensuring the workability of the Business Continuity Plan. This will be periodically reviewed and verified, at least once a year, by active or passive testing methods.

Operations Management will schedule, plan, and execute periodic testing using one (or more) of the following tests:

### **Structured Walk-Through**

A Structured Walk-Through is a cost effective method to evaluate the contents of a plan or a portion of the plan designed to exercise its effectiveness without incurring the expenses or utilizing the personnel resources associated with performing a full test.

The exercise is a paper evaluation of a BCP and it can be performed regularly on different aspects of the plan and under different disaster scenarios. It can vary from a review of a portion of the BCP to a review of the entire plan. The objective is for the test team participants to identify what events and activities could occur in relation to the disaster scenario selected. The methodology employed is a sequential review of the recovery process using the information contained in the plan document in conjunction with the work experience and knowledge of the test team participants.

It is, in effect, a role play of an "incident" or a scenario that takes place within the confines and safety of a conference room. More precisely, it is a "Talk Through" or "Tabletop" exercise where test team participants articulate responses that might take place during an actual incident.

### **Component Testing**

Component Testing is an off-hours exercise to test a particular part of the recovery plan. It serves to verify the correctness of operating procedures,

hardware components and the ability to restore an Organizational Unit's critical functions. An example of this test is a limited systems restoration and a connectivity test at the recovery site.

It differs from the Structured Walk-Through in that it involves actual recovery activities being exercised which may include: Emergency Notification Test (Call Tree Tests); Evacuation and Relocation Tests; Application Recovery Test; Remote or Dial-in Access Test; and Critical Business Function Recovery Test. It is important to note that while personnel might relocate to the recovery site; this type of testing will not include actually processing transactions or carrying out key activities. This type of testing differs from an Integrated Simulation/Full Operations Test in that it does not require the use of the actual recovery sites. All Component Tests should be performed as they are documented in the BCP.

### **Integrated Simulation/Full Operations Testing**

Integrated Simulation/Full Operations Testing is performed at the actual recovery site(s) and utilizes the resources for the specified tasks of the test (i.e., recovery site systems and workspace). This method of testing requires some processing activities to be performed at the recovery site(s) and requires the most advanced preparation of all the test types. A Structured Walk-Through and/or a Component Test normally precede an Integrated Simulation/Full Operations Test.

Integrated Simulation/Full Operations Testing is the best way to test the adequacy of a plan. The test transactions that are processed and all of the reports that are produced (actual results) should be reconciled against expected results identified on the test scripts, for completeness and accuracy. This exercise demonstrates the adequacy of systems and business recovery procedures as well as the compatibility of backup resources and provides validation of the time needed to restore critical functions. An exercise of this proportion is often scheduled to take place after hours or during a weekend.

## **1.9 BCP Plan Test and Incident Reports**

The local Incident Commander will prepare an incident report for each test or real incident. The report will include Incident Declaration details (Incident Trigger Event, Incident Start Time, who declared the incident), BCP Activation, Escalations and

Notifications, BCP Activities, Recovery Activation, Recovery Activities, End of Incident Declaration details.

The BCC will collect the results of tests and incidents and debrief the local Incident Commander and any other relevant personnel and ensure that the results meet BCP requirements.

If the test or incident results do not comply, the BCC will escalate to Operations Management for resolution.

## 1.10 Plan Training Procedures and Responsibilities

Operations Management is responsible for ensuring that the personnel who would carry out the Business Continuity Plan are sufficiently aware of the plan's details.

This may be accomplished by: providing policy updates, practice exercises, participation in tests, and awareness programs conducted by the Business Continuity Coordinator.

## 1.11 Plan Distribution List

The Operations Business Continuity Plan will be distributed to the following departments and/or individuals, and will be numbered in the following manner:

<b>Plan ID No</b>	<b>Location</b>	<b>Responsible Position</b>	<b>Current Contact</b>
1	7 Mota Gur C Building 4 <sup>th</sup> Floor Olympia Park, Petah Tikva, Israel	COO	Roi Mor Roi.m@openlegacy.com +972-52-325-1613
2	Ahuzat Bait 2, Tel Aviv, Israel	CEO	Romi Stein romi.s@openlegacy.com +972-50-916-5736
3	7 Mota Gur C Building 4 <sup>th</sup> Floor Olympia Park, Petah Tikva, Israel	CTO	Roi Mor Roi.m@openlegacy.com +972-52-325-1613
4	Av. Revolucion No. 1267, piso 19 Col. Los Alpes Del. Álvaro Obregón C.P. 01010	Regional Controller	Alejandra Zarco <a href="mailto:alejandra.z.r@openlegacy.com">alejandra.z.r@openlegacy.com</a> +52-55-3717-8695

	Ciudad de México, México		
5	25 Palmer Court Sterling, VA 20165	Regional Controller	Pat Grigsby pat.g@openlegacy.com +1-609-608-0556
6	Room 755, 7/F, Low Block, Grand Millennium Plaza, 181 Queen's Road Central, Central, Hong Kong	Regional Operations Manager	Tiffany Pang tiffany.p@openlegacy.com +852 9336 7215

## 2 Business Continuity Strategy

### 2.1 Introduction

This section of the Operations Business Continuity Plan describes the strategy devised to maintain business continuity in the event of a facilities disruption. **This strategy would be invoked should the OpenLegacy Operations primary facility somehow be damaged or inaccessible.**

### 2.2 Business Function Recovery Priorities

The strategy is to recover critical Operations business functions at the alternate site location(s). Emergency Response Teams will implement offsite operations to restore critical IT and business functions. The IT Team will recover IT functions based on the critical departmental business functions and defined strategies.

Business Functions by Location are listed in **Appendix B (Recovery Priorities for Critical Business Functions)**. "Time Critical Business Functions," i.e., those of which are of the most critical for immediate recovery at the secondary location are:

**Reference: Appendix B – Recovery Priorities for Critical Business Functions**

### 2.3 Relocation Strategy and Alternate Business Site

In the event of a disaster or disruption to the office facilities, the strategy is to recover operations by relocating to an alternate business site. The short-term strategies (for disruptions lasting two weeks or less), which have been selected, include:

Primary Location	Alternate Business Site
103 Carnegie Center, Suite 300, Princeton NJ 08540 USA	25 Palmer Court Sterling, VA 20165
7 Mota Gur C Building 4 <sup>th</sup> Floor Olympia Park, Petah Tikva, Israel	Ahuzat Bait 2, Tel Aviv
OpenLegacy, S.A. de C.V. Av. Revolución 1276 Col. Los Alpes. , Piso 19 Delegación Álvaro Obregón Ciudad de México, México	Employees will work remotely until alternative site is established

Other Regional Offices (TBD)

Employees will work remotely until alternative site is established

For all locations, if a long-term disruption occurs (i.e., major building destruction, etc.); the above strategies will be used in the short-term (less than two weeks). The long-term strategies will be to acquire/lease and equip new office space in another building in the same metropolitan area.

## 2.4 Recovery Plan Phases

The activities necessary to recover from an OpenLegacy facilities disaster or disruptive crisis will be divided into four phases. These phases will follow each other sequentially in time.

### 1. Crisis or Disaster Occurrence

This phase begins with the occurrence of the disruptive event and continues until a decision is made to activate the recovery plans. The major activities that take place in this phase include: **emergency response measures, notification of management, damage assessment activities, and declaration of the crisis or disaster.**

### 2. Plan Activation

In this phase, the Business Continuity Plans are put into effect. This phase continues until the alternate facility, if applicable, is occupied, critical business functions reestablished, and computer system service restored to OpenLegacy's departments. The major activities in this phase include: **notification and assembly of the recovery teams, implementation of interim procedures, relocation to the secondary facility/backup site, and re-establishment of data communications.**

### 3. Alternate Site Operations

This phase begins after secondary facility operations are established and/or backup personnel and systems are set up and continues until the primary facility or essential functions are restored. **The primary recovery activities during this phase are backlog reduction and alternate personnel / facility processing procedures.**

### 4. Transition to Primary Site

This phase consists of any and all activities necessary to make the transition back to a primary facility location and/or normal operations.

## 2.5 Vital Records Backup

All vital records for Operations that could be affected by a crisis or facilities disruption are maintained and controlled by either Operations or IT. These files are periodically backed up and stored at an offsite location as part of normal operations. All vital documents are typically located in files within the office complex and the most current back-up copies are in a secure off-site storage facility.

**OpenLegacy maintains a software escrow policy with Praxis Technology Escrow, providing for complete backup of its entire source library, including all OpenLegacy software versions. This policy and backup protects clients' interests in OpenLegacy software in case of business disruption or disaster-related failure (see Appendix D: Software Escrow Service). The backup library is updated regularly; the latest backup date is specified in Appendix D.**

## 2.6 Restoration of Hardcopy Files, Forms, and Supplies

In the event of a facilities disruption, critical records located in the Operations Department may be destroyed or inaccessible. In this case, the last backup of critical records in the offsite facility would be transported to the secondary facility. The amount of critical records to be reconstructed will depend on when the last shipment of critical records to the offsite storage location occurred.

**Operations management will arrange the frequency of rotation of critical records to the offsite storage site.**

The following categories of information can be exposed to loss:

1. Any files stored on-site in file cabinets and control file rooms.
2. Information stored on local PC hard drives.
3. Any work in progress.
4. Received and un-opened mail.
5. Documents in offices, work cubicles and files.

## 2.7 On-line Access to OpenLegacy Computer Systems

In the event of a disruptive crisis or facilities disruption, the BCP strategy should be to assist in re-establishing connectivity to the OpenLegacy departments and to establish remote communications to any alternate business site location. If the data center is affected by the crisis, disaster or disruption, the IT department will recover processing functions at a pre-determined alternate site. Services covered would include: phones, cellular phones, pagers, communications, and all other services required for restoring limited emergency service to the organization. In this case, data communications will be rerouted from the affected site to the respective alternate business site locations.

## 2.8 Mail and Report Distribution

During the time that OpenLegacy department operations are run from the secondary facilities, output reports and forms will be delivered electronically where possible to that location. Paper mail will be recovered periodically or forwarded through postal services where such service is available. OpenLegacy currently processes nearly all business transactions electronically, so mail disruption would have minimal impact.



## 2.9 Maintenance of Support Activities and Ticket Handling

In the event of a declared disaster or that a Support Engineer is unexpectedly unavailable, Support requests and tickets will be handled by other Support Engineers around the globe. All requests and tickets will be made available to Support Engineers from a pool, without limitations to ownership, as per OpenLegacy's normal Support practices.

## 3 Recovery Teams

### 3.1 Purpose and Objective

This section of the plan identifies who will participate in the recovery process for the Operations Business Continuity Plan. The participants are organized into one or more teams. Each team has a designated team leader and an alternate for that person. Other team members are assigned either to specific responsibilities or as team members to carry out tasks as needed.

**The information in this section is organized into several subsections.**

### 3.2 Recovery Team Descriptions

This section lists the team definitions for the Operations Team and gives a short explanation of the function of each team or function.

- Operations Recovery Team:  
**Responsible for oversight of the Operations recovery functions.**

### 3.3 Recovery Team Assignments

This section identifies the team roles and the specific responsibilities that have been assigned to the team.

- **Team leader** - Overall coordination of Operations Recovery Team
- **Backup Team Leader** - Duties to be assigned based on Recovery Team areas of responsibility.
- **Team Member** - Duties to be assigned based on Recovery Team areas of responsibility

### 3.4 Personnel Notification

This section specifies how the team members are to be notified if the plan is to be put into effect by identifying who calls whom, and in what order. Notification can also be made by using tools such reverse 911 or other notification systems.

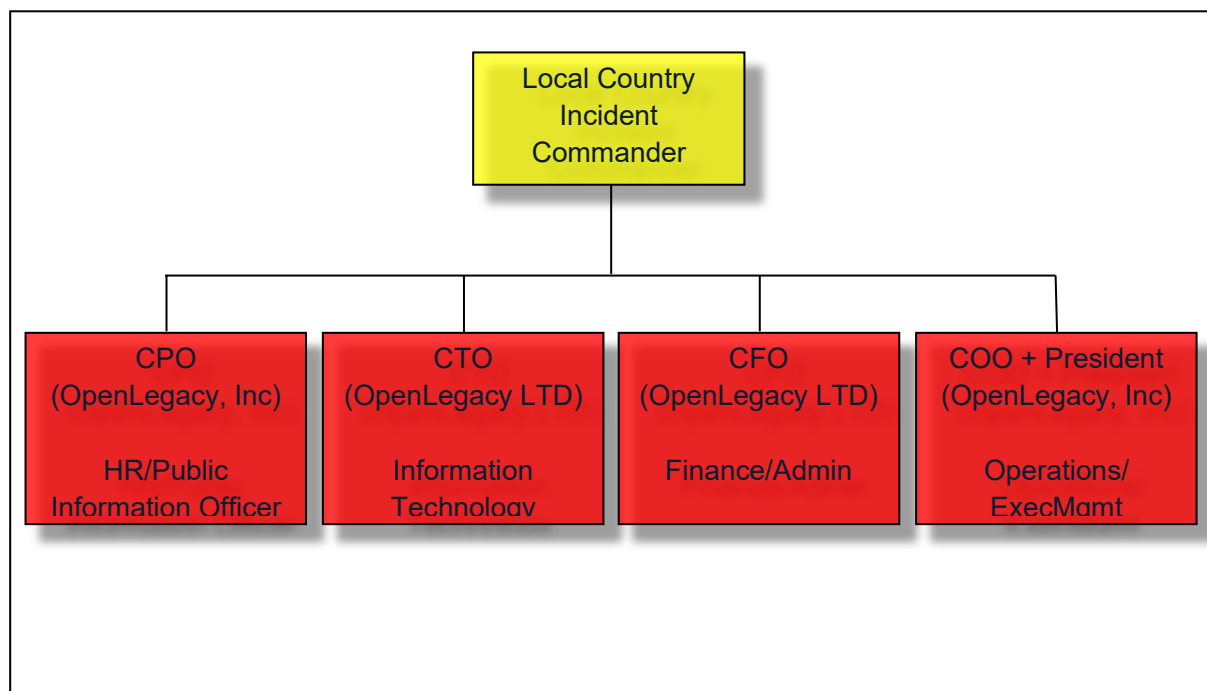
**References: Appendix A - Employee Telephone Lists**

### 3.5 Team Contacts

This section identifies other people or organizations outside of the Operations Team who might need to be contacted during the recovery process. Their names and telephone numbers are provided.

**Reference: Appendix A – Employee Telephone Lists**

## 3.6 Team Responsibilities



### 3.6.1 Business Continuity Coordinator – COO

In the event of a crisis or disaster, the Business Continuity Coordinator is responsible for ensuring that the following activities are successfully completed:

- Works with OpenLegacy Emergency Management Team to officially declare a disaster, if appropriate, and initiate the Disaster Recovery/Business Continuation process to recover OpenLegacy's business functions at an alternate site. In the event of a disruptive crisis, to advise affected personnel of the event and immediate remediation measures.
- Alert OpenLegacy's Senior Management that a disaster has been declared, or a business-disruptive crisis is underway.
- Assist in the development of an official public statement concerning the crisis or disaster. The OpenLegacy's EOC Communications Team Leader is the only individual authorized to make public statements about organization affairs.
- Monitor the progress of all Business Continuity and Disaster Recovery teams daily.
- Present Business Continuity Plan recovery status reports to Senior Management daily.
- Interface with appropriate work management personnel throughout the recovery process.
- Communicate directions received from OpenLegacy's Senior Management to the EOC and Departmental Business Continuity Team Leaders.

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- Provide on-going support and guidance to the Business Continuity teams and personnel.
- Review staff availability and recommend alternate assignments, if necessary.
- Work with OpenLegacy's Senior Management to authorize the use of the alternate recovery site selected for re-deploying critical OpenLegacy resources.
- Review and report critical processing schedules and backlog work progress, daily.
- Ensure that a record of all Business Continuity and Disaster Recovery activity and expenses incurred by OpenLegacy is being maintained.

## 3.6.2

### 3.6.3 EOC Communications Team –

This team is responsible for providing information regarding the crisis mitigation and/or disaster and recovery efforts to:

- OpenLegacy and organization offices Senior Management
- Customers
- Vendors/Contracts
- Media
- Regulatory Agencies
- Other Stakeholders
- Coordinating, submitting, and tracking any and all claims for insurance.

### 3.6.4 EOC Human Resources Team –

This team is responsible for:

- Providing information regarding the crisis mitigation and/or disaster and recovery efforts to employees and families.
- Assisting in arranging cash advances if out of area travel is required.
- Notifying employee's emergency contact of employee injury or fatality.
- Ensuring the processing of all life, health, and accident insurance claims as required.
- Coordinates temporary organization employee requests.

### 3.6.5 EOC Administration Team –

This team is responsible for:

- Ensuring the recovery/restoration personnel has assistance with clerical tasks, errands, and other administrative activities.
- Arranging for the availability of necessary office support services and equipment.
- Providing a channel for authorization of expenditures for all recovery personnel.
- Arranging travel for employees.
- Tracking all costs related to the recovery and restoration effort.

- Identifying and documenting when repairs can begin and obtaining cost estimates.
- Determining where forms and supplies should be delivered, based on damage to the normal storage areas for the materials.
- Contacting vendors to schedule specific start dates for the repairs.
- Taking appropriate actions to safeguard equipment from further damage or deterioration.
- Coordinating the removal, shipment, and safe storage of all furniture, documentation, supplies, and other materials as necessary.
- Supervise all salvage and cleanup activities.
- Coordinating required departmental relocations to the recovery sites.
- Coordinating relocation to the permanent site after repairs are made
- Assuring that arrangements are made for meals and temporary housing facilities, when required, for all recovery personnel.
- Assuring order placement for consumable materials (forms, supplies, etc.) for processing based upon input from the other teams.
- Notifying the Postal Service of delivery disruption.
- Establishing internal mail delivery procedures and process.
- Assuring that mail, and reports are redirected to the proper location as required.

### **3.6.6 Emergency Response Team –**

This team is responsible for:

- The safety of all employees.
- Inspecting the physical structure and identifying areas that may have sustained damage.
- Expanding on and/or revising the findings of the Preliminary Damage Assessment.
- Providing management with damage assessment reports and recommendations.

### **3.6.7 Information Technology Recovery Team–**

This team is responsible for:

- Activating the IT recovery process.
- Managing the IT disaster response and recovery procedures.
- Mobilizing and managing IT resources.
- Coordinating all communications related activities, as required, with telephone & data communications, PC, LAN support personnel, and other IT related vendors.
- Assisting, as required, in the acquisition and installation of equipment at the recovery site.
- Ensuring that cellular telephones, and other special order equipment and supplies are delivered to teams as requested.
- Participating in testing equipment and facilities.
- Participating in the transfer of operations from the alternate site as required.

- Coordinating telephone setup at the EOC and recovery site.
- Coordinating and performing restoration or replacement of all desktop PCs, LANs, telephones, and telecommunications access at the damaged site.
- Coordinating IT disaster recovery efforts between different departments in the same or remote locations.
- Training IT Team Members for disaster recovery operations.
- Keeping Senior Management and the EOC Business Continuity Coordinator apprised of recovery status.

## 4 Recovery Procedures

### 4.1 Purpose and Objective

This section of the plan describes the specific activities and tasks that are to be carried out in the recovery process for Operations. Given the Business Continuity Strategy outlined in **Section II**, this section transforms those strategies into a very specific set of action activities and tasks according to recovery phase.

The Recovery Procedures are organized in the following order: recovery phase, activity within the phase, and task within the activity.

The recovery phases are described in **Section II.D** of the Plan. In the Recovery Procedures document, the phases are listed in the order in which they will occur.

The description for each recovery phase begins on a new page.

Each activity is assigned to one of the recovery teams. Each activity has a designated team member who has the primary assignment to complete the activity. Most activities also have an alternate team member assigned. The activities will only generally be performed in this sequence.

The finest level of detail in the Recovery Procedures is the task. All plan activities are completed by performing one or more tasks. The tasks are numbered sequentially within each activity, and this is generally the order in which they would be performed.

## 4.2 Recovery Activities and Tasks

### 4.2.1 PHASE I: Crisis or Disaster Occurrence

**ACTIVITY:** Emergency Response and Emergency Operations Center Designation (applies only to disaster situations; does not apply to non-disaster crises)

**ACTIVITY IS PERFORMED AT LOCATION:** Main Office or Emergency Operations Center

**ACTIVITY IS THE RESPONSIBILITY OF THIS TEAM:** All Employees

#### **TASKS:**

1. After a disaster occurs, quickly assess the situation to determine whether to immediately evacuate the building or not, depending upon the nature of the disaster, the extent of damage, and the potential for additional danger.

**Note:** If the main office is total loss, not accessible or suitable for occupancy, the remaining activities can be performed from the Emergency Operations Center (EOC), after ensuring that all remaining tasks in each activity have been addressed. This applies to all activities where the Main Office is the location impacted by the disaster. The location(s) of the EOC are designated in **Appendix C - Emergency Operations Center (EOC) Locations**. The EOC may be temporarily setup at any one of several optional locations, depending on the situation and accessibility of each one. Once the Alternate site is ready for occupancy the EOC can be moved to that location.

2. Quickly assess whether any personnel in your surrounding area are injured and need medical attention. If further danger is imminent, then immediately evacuate the building. Summon local emergency and medical resources promptly. If you can assist them without causing further injury to them or without putting yourself in further danger, then provide what assistance you can.
3. If appropriate, evacuate the building in accordance with your building's emergency evacuation procedures. Use the nearest stairwells. Do not use elevators.
4. **Outside of the building meet at nearest safe and accessible point to building entrance. Do not wander around or leave the area until instructed to do so.**
5. Check in with your department manager for roll call. This is important to ensure that all employees are accounted for.



**ACTIVITY: Notification of Management**

**ACTIVITY IS PERFORMED AT LOCATION: At Any Available Phone**

**ACTIVITY IS THE RESPONSIBILITY OF: Operations Management Team**

**PRIMARY: Regional Controller**

**ALTERNATE: Services and Support Manager**

**TASKS:**

1. Team leader informs the members of the Operations management team and notifies the Operations senior management if they have not been informed.
2. Operations personnel are notified of the crisis or disaster by following procedures as included in **Section III. D. - Recovery Personnel Notification.**
3. Depending upon the time of the crisis or disaster, personnel are instructed what to do (i.e. stay at home and wait to be notified again, etc.)

**ACTIVITY: Preliminary Damage and Disruption Assessment**

**ACTIVITY IS PERFORMED AT LOCATION: Main Office Location**

**ACTIVITY IS THE RESPONSIBILITY OF: Operations Management Team**

**TASKS:**

1. Contact the Organization Emergency Response Team Leader to determine responsibilities and tasks to be performed by the Operations Management Team or employees.
2. If the Organization Emergency Response Team requests assistance in performing the Preliminary Damage Assessment, caution all personnel to avoid safety risks as follows:
  - Enter only those areas the authorities give permission to enter.
  - Ensure that all electrical power supplies are cut to any area or equipment that could pose a threat to personal safety.
  - Ensure that under no circumstances is power to be restored to computer equipment until the comprehensive damage assessment has been conducted, reviewed, and authority to restore power has been expressly given by the Emergency Management Team.
3. Inform all team members that no alteration of facilities or equipment can take place until the Risk Management representatives have made a thorough assessment of the damage and given their written agreement that repairs may begin.
4. Instruct the Organization Emergency Response Team Leader to deliver the preliminary damage and disruption assessment status report immediately upon completion.
5. Facilitate retrieval of items (contents of file cabinets -- petty cash box, security codes, network backup tapes, control books, etc.) needed to conduct the preliminary damage and disruption assessment.
6. Ensure that administrative support is available, as required.
7. Arrange a meeting with the Emergency Management Team and Management Teams from other GROUPS/DEPARTMENTS in your facility (location) to review the disaster declaration recommendation that results from the preliminary damage and disruption assessment and to determine the course of action to be taken. With this group, determine the strategy to recommend to Senior Management (the Emergency Management Team Leader will be responsible for communicating this to Senior Management).

**ACTIVITY: Declaration of a Crisis or Disaster**

**ACTIVITY IS PERFORMED AT LOCATION: Main Office Location or Alternate Site/Emergency Operations Center**

**ACTIVITY IS THE RESPONSIBILITY OF: Operations Management Team**

**TASKS:**

1. Actual declaration of a crisis or disaster is to be made by the Emergency Management Team, after consulting with senior management. The Operations Management Team should wait for notification from the Emergency Management Team that a crisis or disaster has been declared and that groups/departments are to start executing their Business Continuity Plans, and relocate to their Alternate Business Site Location if required.
2. The person contacted verifies that the caller is someone who is authorized to do the notification.
3. The person contacted notifies the Operations Senior Management, if they have not yet been contacted.
4. In the event the Emergency Management Team cannot be assembled or reached, the Team Leaders from each Operations Management Team at the location should assemble, gather appropriate information, consult with senior management, and make the decision whether to declare the crisis or disaster.
5. Because of the significance, disruption, and cost of declaring a crisis or disaster, appropriate facts should be gathered and considered before making the decision to declare. Individual groups/department personnel or the respective Operations Management Teams should not unilaterally make a decision to declare a crisis or disaster. This is responsibility of the Emergency Management Team.

## 4.2.2 PHASE II: Plan Activation

**ACTIVITY: Notification and Assembly of Recovery Teams and Employees**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site/Emergency Operations Center**

**ACTIVITY IS THE RESPONSIBILITY OF: Operations Management Team**

### **TASKS:**

1. The team leader calls each member of the management team, instructs them of what time frame to assemble at the Operations Emergency Operations Center (to be decided at the time), and to bring their copies of the Plan. The location(s) of the EOC are designated in **Appendix C - Emergency Operations Center (EOC) Locations**. The EOC may be temporarily setup at any one of several optional locations, depending on the situation and accessibility of each one. Once the Alternate site is ready for occupancy the EOC can move to that location, if preferred.
2. Review the recovery strategy and action plan with the assembled team.
3. If necessary, adjust the management team assignments based on which members are available.
4. The Management Team contacts critical employees and tells them to assemble at the alternate site. If the alternate site is a long distance from the primary site (i.e. out-of-state), then individuals should make their own travel arrangements to the alternate site. Non-critical employees should be instructed to stay at home, doing what work is possible from home, until notified otherwise.
5. **In the event of a disaster that affects telecommunications service regionally**, the Management Team should instruct critical employees to proceed to the alternate site even if they have not been contacted directly. Delays in waiting for direct communications can have a negative impact on OpenLegacy's ability to recover vital services.

**ACTIVITY: Relocation to Alternate Site**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site**

**ACTIVITY IS THE RESPONSIBILITY OF: All Critical Personnel**

**TASKS:**

1. When instructed by the Operations Management Team, make arrangements to commute or travel to the alternate site. **Reference item #5 under Notification and Assembly Procedures for exception to this step.**
2. The Operations Management Team needs to consult with the Emergency Management Team and the Organization Emergency Response Team to determine if access can be gained to the primary (damaged) site to retrieve vital records and other materials. The Organization Emergency Response Team will only allow access to the primary site if the authorities grant access. This will be dependent upon the nature of the disaster and the extent of damage.
3. If allowed access to the primary site to retrieve vital records and other materials, **perform some pre-planning to determine what is most important to retrieve.** This may be necessary since the time you may be allowed access to the primary site may be minimal.
4. Depending on the amount of vital records and other materials you are able to retrieve from the primary site, make arrangements to transport this material to the alternate site. If the material is not too great, this could be accomplished by giving to employees to carry along with them. If the material is a large amount, then make arrangements for transport services and/or overnight courier services.
5. Management and critical employees travel to alternate site.

**ACTIVITY: Implementation of Interim Procedures**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site**

**ACTIVITY IS THE RESPONSIBILITY OF: Operations Management Team**

**TASKS:**

1. After arrival at the alternate site, map out locations that can be used for workspace. This should include unused offices and cubicles, conference rooms, training rooms, lunch/break areas, and open space in hallways or in other areas.
2. Obtain additional tables and chairs, either from the office or from outside rental agencies to provide additional workspace. Place in any available open areas, but be cautious of not blocking exits for fire evacuation purposes.
3. **Determine flexible working schedules for staff** to ensure that client and business needs are met, but also to enable effective use of space. This may require that some employee's work staggered shifts or may need to work evening or nightshifts.
4. Gather vital records and other materials that were retrieved from the primary site and determine appropriate storage locations, keeping in mind effectiveness of workgroups.
5. Determine which vital records, forms, and supplies are missing. Obtain from off-site storage location or from other sources, as needed.
6. Developed prioritized work activities, especially if all staff members are not available.

**ACTIVITY: Establishment of Telephone Communications**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site**

**ACTIVITY IS THE RESPONSIBILITY OF: IT Liaison**

**TASKS:**

1. Contact the Organization Disaster Recovery/IT Team to determine what activities they are taking to reroute telephone communications to the alternate site. **Do not directly contact the telephone company** - this will be handled by the Organization Disaster Recovery/IT Team.
2. If your alternate site is at another OpenLegacy office, provide call routing info to the switchboard operator as appropriate.
3. If your primary office phones will not be switched to the alternate site, let the Organization Disaster Recovery/IT Team know that the phones need to be transferred to the phone numbers you will be using at the alternate site.
4. Coordinate with the Organization Communications Team regarding contacting customers to notify them of the crisis or disaster situation, how OpenLegacy is responding, and how you can be reached. **Do not contact customers until the Organization Communications Team has given you instructions.**

**Organization Communications will provide you with scripts and guidance on how to discuss the crisis or disaster with customers to provide assurance that their confidence in OpenLegacy will be maintained.**

**ACTIVITY: Restoring Data Processing and Data Communications with Primary or Secondary Backup Data Center**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site**

**ACTIVITY IS THE RESPONSIBILITY OF THIS TEAM: IT Liaison**

**TASKS:**

1. Contact the IT Team to determine when the data center is to be recovered, if affected by the crisis or disaster. Also, discuss when data communications will be established between the primary or secondary backup data center and your alternate site.
2. If your alternate site is another OpenLegacy office, determine if that site has access to the computer systems that Operations uses. If so, work with local office management to determine how workstations and/or equipment and internet access can be shared between personnel from their groups/departments and Operations. This may involve using flexible hours or multiple shifts for your personnel.
3. Discuss with the IT Team when and how replacement equipment, if needed, will be provided to you at the alternate site and when they will be connected.
4. Discuss with the IT Team when the files from your normal PC/LAN servers and applications will be restored and how you can access those files. Also, work with other OpenLegacy management at your alternate site to discuss using their LAN servers.
5. Discuss with the IT Team your normal application report distributions, such as when you can expect to receive standard computer reports and how they will be distributed to your alternate site.
6. Communicate the IT recovery status to all Operations personnel who regularly use the systems.



### **4.2.3 PHASE III: Alternate Site Operations**

**ACTIVITY: Alternate Site Processing Procedures**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site**

**ACTIVITY IS THE RESPONSIBILITY OF: Alternate Site Operations Team**

**TASKS:**

1. Communicate with customers regarding the crisis or disaster and re-solicit phone contacts (in conjunction with the Organization Communications Team)
2. Acquire needed vital documents
3. Access missing documents and files and reconstruct, if necessary
4. Set up operation

**ACTIVITY: Manage work backlog reduction.**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site**

**ACTIVITY IS THE RESPONSIBILITY OF: Alternate Site Operations Team**

**TASKS:**

1. Determine priorities for work backlogs to ensure the most important backlogged tasks are resolved first.
2. Set an overtime schedule, if required, based on staff and system availability.
3. Set backlog priorities, establish a backlog status reports if necessary, and communicate this to the Operations supervisor.
4. Report the backlog status to Operations management on a regular basis.
5. If backlogs appear to be very large or will take a significant time to recover, determine if temporaries could be used for certain tasks to help eliminate the backlogs. If justified, arrange for temporaries to come in.

#### **4.2.4 PHASE IV: Transition to Primary Operations**

**ACTIVITY: Changing Telephone and Data Communications Back to Primary Site**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site**

**ACTIVITY IS THE RESPONSIBILITY OF: IT Liaison**

**TASKS:**

1. Coordinate with the IT Team to determine when Operations will be relocating back to the primary site. Verify that they have a schedule to ensure that telephone and data communications are rerouted accordingly.
2. Discuss when and how PC's, laptops, and printers, if brought into the alternate site, will be de-installed, moved back to the primary site and re-installed.

**ACTIVITY: Terminating Alternate Site Procedures**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site and Primary Site**

**ACTIVITY IS THE RESPONSIBILITY OF: Operations Team**

**TASKS:**

1. Determine which alternate site operating procedures will be suspended or discontinued and when.
2. Communicate the changes in procedures to all affected staff.
3. Determine if additional procedures are needed upon return to the primary site, such as to continue resolving work backlogs.

**ACTIVITY: Relocating Personnel, Records, and Equipment Back to Primary (Original) Site**

**ACTIVITY IS PERFORMED AT LOCATION: Alternate Site and Primary Site**

**ACTIVITY IS THE RESPONSIBILITY OF: Operations Management Team**

**TASKS:**

1. In conjunction with the Emergency Management Team and the Organization Emergency Response Team, determine when Operations will be scheduled for relocating back to the primary site.
2. Communicate this schedule to all Operations personnel.
3. Inventory vital records, equipment, supplies, and other materials, which need to be transported from the alternate site to the primary site.
4. Pack, box, and identify all materials to be transported back to the primary site.
5. In conjunction with the Organization Administration Team, make arrangement for a moving company or courier service to transport the boxes back to the primary site.

## 5 Appendices

**Appendix A - Employee Telephone Lists**

**Appendix B - Recovery Priorities for Critical Business Functions**

**Appendix C - Emergency Operations Center (EOC) Locations**

**Appendix D – Software Escrow Service**

**Appendix E – Pandemic Prevention and Response Procedures**

## 5.1 Appendix A - Employee Telephone Lists

BCP – Role	Name	Email	Phone(s)
Regional Incident Commander – North America	Pat Grigsby	Pat.G@openlegacy.com	609.608.0556 540-535-6673
Regional Incident Commander – LATAM	Alejandra Zarco	Alejandra.z@openlegacy.com	52-55-3717-8695
Regional Incident Commander - EMEA & ISR	Yafit Solomon	Yafit.S@openlegacy.com	972 54 488 7529
CEO	Romi Stein	Romi.S@openlegacy.com	972 50 916 5736
President	Ron Rabinowitz	Ron.R@openlegacy.com	41 78 626 75 52
CSO / COO	Roi Mor	Roi.M@openlegacy.com	972 52 325 1614
CPO	Zeev Avidan	Zeev.A@openlegacy.com	201 873 0319
CTO	Roi Mor	Roi.M@openlegacy.com	972 52 325 1614
Support Team Leader	Ruslan Abramov	Ruslan.A@openlegacy.com	972 54 760 2427

## 5.2 Appendix B - Recovery Priorities for Critical Business Functions

### Recovery Point Objectives with Recovery Time Objectives – Maximum Allowable

Department Operations	Priorities	Maximum Allowable Downtime			
		1-2 Days	3-5 days	1-2 weeks	> 2 weeks
<b>Contracts</b>	<b>Critical</b>	<b>X</b>			
Support call center	Not Applicable – Support Portal Cloud Based				
Online support site	Not Applicable – Support Portal Cloud Based				
Online partners portal	Not Applicable – Partner Portal Cloud Based				
R&D activity	Not Applicable – R&D Activity is De-Centralized				
Company website	Not Applicable				
HR systems	All employee records are stored physically offsite, with scanned copies on secured cloud storage		<b>X</b>		
Email communication	Not Applicable – Cloud Based Gmail				
Legal and Contracts	All contracts and agreements are stored physically offsite, with scanned copies on secured cloud storage		<b>X</b>		
Project Delivery	Not Applicable - Project Management – Project status and activities are SaaS PSO based				



## 5.3 Appendix C - Emergency Operations Center (EOC) Locations

**Disaster Affecting Which Area/Building**

**EOC Location**

**OpenLegacy Home Community City**

**Recovery Locations and Travel Directions**

5.3.1.1 Alternate Sites

Critical Function	Alternate Site
Desktop and Personnel	Remote [Home] location
EOC Emergency Management Team	Remote [Home] location

**NOTE** - Provide directions to all alternate sites. Include address and phone number of site.

## 5.4 Appendix D – Software Escrow Service

### Account Summary



Date of Summary: September 17, 2019

Depositor Name: OpenLegacy

Contract Type: 2 Party SaaS

Contract Effective Date: September 22, 2017

Deposit Account Number: 170922

Client Support Representative: Meghan Henderson

Enrolled Beneficiary: [per specific contracts]

Deposit Material Entitlement: unknown

Date of Last Deposit: September 11, 2019 (automatic syncing via connected archive)

## 5.5 Appendix E – Pandemic Prevention and Response Procedures

### 1. INTRODUCTION:

This appendix to the OpenLegacy BCP provides guidance for effective response and maintaining essential functions and services in the event of an influenza pandemic affecting areas of OpenLegacy's operations. This appendix neither replaces nor supersedes any part of the OpenLegacy Global Business Continuity Plan; rather it supplements it, providing additional guidance for specialized continuity planning required for a pandemic by addressing additional considerations, challenges, and elements specific to the effect on OpenLegacy's operations and personnel of a pandemic.

### 2. PURPOSE:

As set forth in this appendix, OpenLegacy's primary operations are geographically dispersed and primarily performed online, allowing for maintenance of essential services even in the event of a worldwide pandemic. Even onsite client services may be maintained via pandemic migration strategies. The key element in maintenance of OpenLegacy's essential functions is prompt communication of geographically-relevant alerts and guidance on mitigation strategies appropriate to the function.

### 3. PANDEMIC PLANNING ASSUMPTIONS:

OpenLegacy's pandemic planning is based on the following assumptions:

- a. Our personnel and operations are susceptible to disruption by pandemic flu and illness.
- b. The operations of our clients are a primary concern, which requires OpenLegacy to take all reasonable measures to prevent our personnel from furthering disease transmission to clients' personnel.
- c. Disruption of OpenLegacy's and clients' operations can be largely prevented and mitigated via sensible prevention measures, timely warnings and guidance to personnel, and escalated response measures in the event of a severe outbreak.
- d. OpenLegacy's established Business Continuity Strategy will be effectively address the need for offsite operations in the event of a severe pandemic affecting OpenLegacy's primary IT operations site.

### 4. CONCEPT OF OPERATIONS:

OpenLegacy's pandemic procedures are twofold, comprised of preventative measures, including education of personnel and preventative vaccination policies, and responsive, comprised of a global flu / pandemic monitoring process, accompanied by alerts to personnel, recommendations of mitigation measures, and, if deemed necessary due to severe threats to specific on-site locations, suspension of staff travel and migration of onsite functions to remote service delivery.

### 5. CONTINUITY MEASURES

#### a. PREVENTATIVE POLICIES

OpenLegacy provides seasonal warnings and guidance on flu prevention to all personnel. OpenLegacy personnel are strongly encouraged to obtain annual flu vaccinations, and frequent travelers are individually targeted for vaccination reminders and geographically-specific alerts pertaining to their areas of travel.

The OpenLegacy Regional Incident Commanders (RIC) for North America, LATAM, EMEA & Israel, and APAC are subscribed for weekly updates from the World Health

Organization's FluNet Summary, providing alerts as to flu prevalence in the geographic areas of their responsibility.

#### **b. RESPONSIVE MEASURES**

Regional Incident Commanders are responsible for monitoring flu and pandemic events for geographic areas where their regional personnel are active, and providing targeted warnings, including mitigation advice via email to potentially affected personnel. In the event of pandemic conditions affecting the locality in which OpenLegacy are engaged, the RIC shall refer the concern to the Chief Operations Officer (COO). The COO shall consult with potentially-affected personnel and/or their supervisors, and make a determination as to whether onsite operations will be migrated to remote service delivery methods.

#### **6. PANDEMIC RESPONSE TEAM**

The Regional Incident Commanders identified in Appendix A will have frontline responsibility for pandemic monitoring and response. The Chief Operations Officer will supervise and direct their activities with respect to pandemic prevention and response.

#### **7. BUSINESS CONTINUITY STRATEGY**

OpenLegacy's Pandemic Response Strategy will be primarily implemented via the preventative and responsive measures described in Section 5 above. The COO shall determine if a pandemic incident or circumstance requires implementation of the Business Continuity Strategy in whole or in part.