

# BUSINESS CONTINUITY PLAN

Disaster Recovery and Operational Resilience

## NIHAO CARBON CERTIFICATES

**Version 1.0**

Effective Date: January 1, 2024

Classification: **CONFIDENTIAL**

## 1. Purpose

This Business Continuity Plan (BCP) ensures Nihao Carbon Certificates can maintain critical business functions during and after a disaster or significant disruption, in compliance with MiFID II and DORA requirements.

## 2. Critical Business Functions

1. **Order Execution** – Recovery Time Objective (RTO): 4 hours
2. **Client Position Management** – RTO: 4 hours
3. **Settlement Processing** – RTO: 24 hours
4. **Registry Transfers** – RTO: 24 hours
5. **Client Reporting** – RTO: 48 hours
6. **Regulatory Reporting** – RTO: Per regulatory deadlines

## 3. Disaster Scenarios

- Loss of primary office/facility
- IT system failure or cyber attack
- Loss of key personnel
- Third-party service provider failure
- Power or telecommunications outage
- Pandemic or public health emergency

## 4. Recovery Strategies

### 4.1 IT Systems

- Hot standby systems at geographically separate data center
- Real-time data replication
- Daily encrypted backups with 30-day retention
- Automatic failover capability

### 4.2 Personnel

- Cross-training of critical functions
- Remote working capability for all staff
- Succession planning for key roles
- Emergency contact list maintained off-site

## 5. Testing

- **Full failover test:** Annually
- **Tabletop exercises:** Semi-annually
- **Backup restoration tests:** Quarterly
- **Communication tree tests:** Quarterly

## 6. Emergency Contacts

**BCP Coordinator:** [NAME], [PHONE]

**IT Emergency:** [NAME], [PHONE]

**Compliance:** [NAME], [PHONE]

**CEO:** [NAME], [PHONE]