

BUSINESS CONTINUITY MANAGEMENT SYSTEM POLICY

SAPIN Group is a leading manufacturer & supplier of metal and plastic packaging, as well as services related to the production of packaging.

Business Continuity Management (BCM) is concerned with managing continuity and operational risks to ensure the continued availability of key processes, critical services, resources and operations throughout the supply chain.

SAPIN recognizes the potential risks associated with disruptions caused to its business operations and the importance of planning and maintaining a viable capacity to restore and resume operations with minimal impact in the event of a disruption.

This policy applies to all SAPIN staff, businesses and support functions, including areas and activities in which third parties operate and/manage SAPIN business

The corporate goal for setting up a BCMS at SAPIN is to put in place appropriate measures that can ensure continuity of critical business processes with minimal interruption in the event of a significant business disruption.

Business Continuity objectives:

- Ensure that Compliance with regulatory requirements and ISO 22301:2019 standard requirements.
- Ensure BCM Goals & Objectives are aligned with Corporate Business Goals & Objectives.
- Identify and prioritize the critical business activities that need to be recovered within tolerable timelines to ensure minimal disruptions and risk to the business operations.
- Assess the potential impacts of interruption to the business activities in terms of financial and non-financial losses.
- Ensure reasonable steps are taken to monitor both internal and external environments to identify, document and assess risks that may interrupt critical business activities.
- Assess the level of identified risks to prioritize the planning and implementation of risk mitigation controls and its monitoring
- Produce and maintain fit for purpose BCMS to ensure timely recovery of critical business activities, protection of lives and safeguard of reputation in the event of a significant business disruption.
- Ensure that the BCM policy is extended and communicated to any outsourced entity that has/ could have an impact on SAPIN activities in case of business interruption or disaster. To ensure that the critical outsourced activities/ vendor providing the service have a backup/ contingency plan that is in line with the SAPIN BCMS requirements.
- Establish necessary roles and responsibilities for successful planning, implementation, operation, monitoring and review of BCMS on an ongoing basis.
- Ensure BCM Plans and procedures are exercised and reviewed at regular intervals to ensure that they are maintained up to date and fit for purpose

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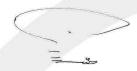
رأس المال المحفوع : ٢٠,٠٠٠,٠٠٠ ريال – س.ت: ٢٠٥٠٠٣٧١٢ – الدمام –رقم ضريبة القيمة المضافة ٣٠٠٥٠٤٣٥٨٤ – هاتف: ٢٠،٣٨٤٧١٢٢ – فاكس: ٩٩٦١٣٨٤٧٤٢٠ Paid Up Capital SR. 20,000,000 - C.R. 2050003711 - Dammam - VAT No. 300504358400003 T : +966 13 847 1322 F : +966 13 847 4120



We realize these objectives through:

- Monitoring and reviewing activities for complying to comply with any relevant regulatory requirements applicable to SAPIN.
- Initiating necessary steps to ensure that in the event of a disaster scenario causing disruptions to normal operations, all essential services will be maintained at an acceptable level and normal operations restored as soon as possible.
- Up-keeping constant analysis and development of the implemented ISO: 22301:2019 standard guidelines
- Monitoring, reviewing and maintaining robust emergency response, business continuity and disaster recovery plans.
- Ensure that emergency response, business continuity and disaster recovery plans are developed to enable the organization to response, recover and restore critical operations within an acceptable timeframe.
- Verify on an annual basis that all reasonable steps are being taken in meeting the statutory and regulatory obligations and the related BCMS internal controls are operating effectively.
- SAPIN has taken commitments for continual improvement of the BCMS.
- Molding the personnel's skills and competencies by making them aware of importance of implemented system.
- Promote BCM awareness across the organization through communication of approved policies, standards, plans, procedures, guidelines.
- Providing specific BCM training to managers and staffs to enable them to respond to any major incident in a planned manner.
- Providing Cyber Security Response processes to maintain Information Security during Cyberattacks.

The Business Continuity System policy is the framework for setting Business continuity objectives in order to support Business continuity, Recovery, SAPIN group's strategy and sustainable growth. The SAPIN Group directors/ Senior Management provides resources and means necessary to implement the Business Continuity Management system policy, its regular reviews of efficiency and the policy is communicated to all interested parties.



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Date: 18.10.2022

SP-08 Rev 00



رأس المال المدفوع : ٢٠,٠٠٠,٠٠٠ ريال – س.ت، ٢٩٦،٠٠٣ – الدمام –رقـم ضريبة القيمة المضافة ٣٠،٥٠٤٣٥٨٤ – هاتف:٢٢،٣٨٤٧١٢٢ – فاكس: ٩٩٦،١٣٨٤٧٤٢٠ Paid Up Capital SR. 20,000,000 - C.R. 2050003711 - Dammam - VAT No. 300504358400003 T : +966 13 847 1322 F : +966 13 847 4120