

## **Business Continuity Policy**

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## 1.0 Document Information

### 1.1 Document Location

The source of this document will be found at this location:

Sharepoint

### 1.2 Revision History

<b>Revision Date</b>	<b>Version</b>	<b>Summary of Changes</b>	<b>Author</b>
January 2024	0.1		David Hankin
March 2024	1.0	Approved by The Board	
March 2025	1.1	Updated to include names of key trading subsidiaries	David Hankin
March 2025	2.0	Approved by the Board	
March 2026	1.1	Minor updates	David Hankin

## 1. INTRODUCTION

- 1.1. Hargreaves Services plc, (**Company**), has a number of divisions and subsidiaries with its group (**Group**). The subsidiaries covered by this policy statement include but are not limited to: Hargreaves Industrial Services Limited; Hargreaves (UK) Limited; Blackwell Earthmoving Limited; Hargreaves (UK) Services Limited; S&B Utilities Limited; C.A Blackwell (Contracts) Limited; Hargreaves Land Limited; Hargreaves Waste Management Services Limited; Hargreaves Services (Blindwells) Limited; Hargreaves Trading Limited; Hargreaves Industrial Services (HK) Limited; Hargreaves Power Services (HK) Limited; Access Services (HK) Limited; Hargreaves Services South Africa (Pty) Limited; and Hargreaves Industrial Services Sdn Bhd.
- 1.2. The aim of this policy is to provide a consistent approach to anticipating, mitigating (where possible) and having flexible and tested plans in place to minimise disruption when unplanned events significantly interrupt normal business.
- 1.3. The objectives are:
  - 1.3.1. in the event of an Emergency or Incident, to ensure that the Group can perform critical operation and/or support activities without which the business would rapidly be unable to achieve its objectives;
  - 1.3.2. to facilitate an organised and co-ordinated response to an Emergency / Incident; and
  - 1.3.3. to provide an agreed framework within which key employees and other staff can work in a concerted manner to solve problems caused by an Emergency / Incident.

## 2. INTERPRETATION

For the purpose of the policy, the following definitions apply:

- 2.1. A “**Business Continuity Plan**” has the meaning given to it in paragraph 4 of this policy.
- 2.2. A “**Business Impact Assessment**” or “**BIA**” has the meaning given to it in paragraph 5 of this policy.
- 2.3. A “**Business Unit**” means each of the business units within the Group.
- 2.4. An “**Emergency**” is an actual or impending situation that may cause injury, loss of life, destruction of property, or cause the interference, loss or disruption of a Business Unit’s normal business operations to the extent that there is a risk that the business would rapidly be unable to achieve its objectives.

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- 2.5. An “**Incident**” is any event that may be, or may lead to, a business interruption, loss and/or crisis to the extent that there is a risk that the business would rapidly be unable to achieve its objective.

### **3. ROLES AND RESPONSIBILITIES**

- 3.1. The Business Unit Managing Director is responsible for the overall application of this policy within their Business Unit.

### **4. BUSINESS CONTINUITY PLAN**

- 4.1. Each Business Unit is required to maintain a Business Unit Continuity Plan to identify material potential internal and external issues that may affect the Business Unit’s ability to operate effectively and deliver its objectives.

- 4.2. The Business Unit Continuity Plan shall include as a minimum:

- 4.2.1. Business Impact Assessment – please see paragraph 5 of this policy;
- 4.2.2. scenario/risk identification to identify and prioritise risk scenarios – please see paragraph 6 of this policy;
- 4.2.3. incident/response planning providing guidance on initial responses to Emergencies / Incidents;
- 4.2.4. a plan to recover to normal operation;
- 4.2.5. PR response planning (to reflect the principles in paragraph 10 of this policy);
- 4.2.6. roles & responsibilities identifying key employees in the business and contact details;
- 4.2.7. contact details for third parties that are vital in ensuring recovery to acceptable operational levels;
- 4.2.8. alternative supplier planning – please see paragraph 7 of this policy;
- 4.2.9. plan testing and lessons learnt - see paragraph 8 of this policy; and
- 4.2.10. Business Unit “red files” – see paragraph 9 of this policy.

- 4.3. Business Continuity Plans should be reviewed and updated at least annually.

### **5. BUSINESS IMPACT ASSESSMENTS**

- 5.1. Business Unit Business Continuity Plans should include a Business Impact Assessment (**BIA**) to highlight which functions within Business Units are critical in

ensuring the continuation of operations. The BIA should allow the Business Unit to prioritise which functions should be recovered sooner than others.

- 5.2. Part of the objective for including a BIA in the Business Continuity Plan is, in the event of an Emergency / Incident, to reduce the risk of time spent in understanding which functions should be prioritised to be recovered first.
- 5.3. The critical functions identified within the BIA can be used to inform and focus the Business Continuity Plan scenario/risk identification on the business critical

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functions for the continuation of operations. Please see paragraph 6 of this policy for further details on scenario / risk identification.

- 5.4. An example BIA is included in Appendix A. This example is provided only for guidance purposes. Business Units are free to adopt a different format if appropriate providing that the critical functions are identified within its BIA.

## **6. SCENARIO/RISK IDENTIFICATION**

- 6.1. Business Continuity Plans shall include identification of scenarios that could impact the business being able to achieve its objectives.

- 6.2. The scenarios to be considered in the Business Continuity Plan may include (but not be limited to) the following:

6.2.1. flood;

6.2.2. explosion;

6.2.3. terrorist event;

6.2.4. bomb threat;

6.2.5. fire;

6.2.6. IT failure;

6.2.7. power failure;

6.2.8. adverse weather;

6.2.9. major illness; and

6.2.10. break in and/or damage to property.

- 6.3. The scenarios should be prioritised by a risk rating based on impact and likelihood.

## **7. ALTERNATE SUPPLIER PLANNING**

- 7.1. Business Units should identify key third party suppliers and plan in the event of such third party being incapable of supplying due to events including but not limited to insolvency, closure or the occurrence of a business continuity event.

- 7.2. Details of the review of key suppliers carried out by Business Units (together with guidance or details of alternative arrangements should such third party become incapable) shall be included within the Business Continuity Plan.

## **8. PLAN TESTING & LESSONS LEARNT**

- 8.1. Business Continuity Plans shall include details on testing of the effectiveness of Business Continuity Plans and plans to improve the Business Continuity Plan

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(including lessons learnt). Testing should be carried out by Business Units at least every 18 months.

- 8.2. Testing can be carried out by a “desktop test” where key personnel within the Business Unit meet and scenarios presented to explore how the Business Continuity Plan would respond and to assess whether the Business Continuity Plan is followed in practice.

## **9. RED FILES**

- 9.1. Business Units should identify any critical hard-copy documents and procedures to be immediately accessible to maintain operations (for example, a copy of the Business Continuity Plan). These documents are often referred to as “red files”. Business Continuity Plans should list any red files to be kept available in hard copy in the event of disruption.

## **10. NOTIFICATION OF INCIDENTS AND EMERGENCIES**

- 10.1. Any Incidents or Emergencies should be reported by the Business Unit Managing Director to the Group CEO by telephone (with a follow up email to the Group CEO and Group CFO) within 1 hour of becoming aware of the event (or as soon as practicable).
- 10.2. The Business Continuity Response Team shall include:
- 10.2.1. Group CEO;
  - 10.2.2. Group CFO;
  - 10.2.3. Hargreaves Legal; and
  - 10.2.4. Group IT Director.
- 10.3. As soon as practicable following a serious incident notification, the Business Unit Managing Director shall arrange a meeting of the Business Continuity Response Team to agree a response strategy.
- 10.4. Further meetings (in person or by telephone) will be arranged by the Business Continuity Response Team at appropriate stages in line with the strategy agreed at the outset by the serious incident team.

## **11. MEDIA / PRESS**

- 11.1. Following the occurrence of an Emergency and/or Incident, any media/press enquiries should be directed to the Chief People Officer using the details on the website at <https://www.hsgplc.co.uk/news-and-media/hargreaves-services-media->

[contact/](#). The Business Unit Managing Director must take steps to ensure that this process is communicated within its Business Unit.

- 11.2. No statements are to be made to the media/press (including responses to enquiries) unless approved by the Business Continuity Response Team.

Appendix 1 – Example Business Impact Assessment (for guidance only – Business Units are free to adopt their own version)

## Business Impact Assessment

**\*BUSINESS UNIT HERE\***

Description			Downtime Impact Assessment							
Function/ Location	BIA Owner	Headcount	2 Hours	4 Hours	8 Hours	24 Hours	48 Hours	1 Week	Total	Priority
Finance	Joe Bloggs	4	1	1	1	2	3	4	12	1
Legal									10	3
HR									7	5
H&S									8	4
[SPECIFIC SITES – NAME]									11	2
Xxx										
Xxx										

### *Downtime Impact Analysis Key*

- 1 – Marginal Impact
- 2 – Acceptable Impact
- 3 – High Impact
- 4 – Catastrophic Impact

*Headcount – included for key person risk*