



IT BUSINESS CONTINUITY FRAMEWORK

AXIA Ventures Group Ltd (“AXIA”) places absolute priority to the continuation of its IT operations in case of an emergency or any disruption event. More specifically, AXIA’s Business Continuity Plan (“BCP”) is a bespoke, internally-developed, business-owned, business-driven process that establishes a fit-for-purpose strategic and operational framework that:

- Proactively improves AXIA’s Business Services resilience against the disruption of its ability to achieve its objectives.
- Provides a rehearsed method of restoring AXIA’s ability to supply its services to an agreed level within an agreed time after a disruption.
- Delivers capability to proactively manage a business disruption and protect AXIA’s reputation.

Critical Components

AXIA’s BCP to ensure business continuity in the event of significant business disruption addresses the following key areas:

- Data back-up and recovery of primary books and records (hard copy and electronic).
- Restoration to the extent possible of all mission critical systems. These are systems that are necessary, to ensure prompt and accurate processing of securities and equities transactions, including, but not limited to, order routing, order entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.
- Establishment of alternate communications between AXIA and its employees and other critical business constituents and counter-parties to ensure minimum interruption to normal business.
- Development of alternate physical location for AXIA’s employees, including key personnel that have been pre-identified to assist in the resumption of business operations.
- Establishment of communications with regulators through whatever means are still available, including the designation of business continuity plan contacts with the Cyprus Securities and Exchange Commission to assist in these communications and ensure AXIA remains compliant with regulatory reporting requirements.
- Provision to clients of prompt access to their funds and securities.

AXIA’s recovery strategy involves focusing on its critical business operations. It includes consideration of regional and wide-scale disruption scenarios both locally and in any of AXIA’s global locations. AXIA uses the following resources to implement its recovery strategy:

- Dedicated technical recovery facilities. AXIA runs a global network of geographically diverse (Europe and America) datacentres that house production applications and backup applications(in separate facilities).
- Dedicated and shared work area recovery facilities.
- Internal reciprocal seating arrangements.

- Distributed Operations: critical business processes are run in geographically separate and distant locations so as not to be impacted by the same wide-scale disruptions.
- Recovery capabilities for all critical functions, applications and processes.
- Crisis Management Framework: teams and facilities are in place for each location to ensure that crisis events are identified, escalated and managed to minimise impact to AXIA. They are exercised on a regular basis.
- AXIA's main DataCenter for Equity trading has been approved by Lloyds Register Quality Assurance with **ISO 22301:2012** for its Business continuity systems to all business operations and provided products and services.

Disclaimer and Business Continuity Contacts

This framework has been prepared for the purposes of providing a high level summary of AXIA's IT continuity framework. It is not a comprehensive list of AXIA's IT actions and no reliance should be placed upon it for making any assumptions or taking any decisions of any kind.

For more information on AXIA's approach to business continuity, speak to your regular contact person in the first instance. This framework is subject to modification and AXIA may update it periodically and without notice. AXIA will post updates on its website www.axiavg.com. AXIA's clients can also use the following points of contact:

Email: info@axiavg.com

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