

Frontera Consulting

Disaster Recovery Business Continuity Plan

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Section I: Introduction

A. How to Use This Plan

In the event of a disaster which interferes with Frontera Consulting'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 of the 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 Frontera Consulting will control/implement to maintain business continuity in the event of a 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, Team Procedures, determines what activities and tasks are to be taken, in what order, and by whom in order to affect the recovery.

Section V, Appendices, contains all of the other information needed to carry out the plan. Other sections refer the reader to one or more Appendices to locate the information needed to carry out the Team Procedures steps.

B. Objectives

The objective of the Business Continuity Plan is to coordinate recovery of critical business functions in managing and supporting the business recovery in the event of a facilities (office building) disruption or disaster. This can include short or long-term disasters or other disruptions, such as fires, floods, earthquakes, explosions, terrorism, tornadoes, extended power interruptions, hazardous chemical spills, and other natural or man-made disasters.

A disaster is defined as any event that renders a business facility inoperable or unusable so that it 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.
- 2. Mitigate threats or limit the damage that threats can cause.

- 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.

C. 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 Frontera Consulting's facilities. 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 disasters such as fires, floods, and other localized natural or man-made disasters. 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.

D. Changes to the Plan/Maintenance Responsibilities

Maintenance of Frontera's Business Continuity Plan is the joint responsibility of the executive management team, HR & Operations, and the Business Continuity Coordinator.

The executive management team, with HR is responsible for:

- 1. Periodically reviewing the adequacy and appropriateness of its Business Continuity strategy.
- 2. Assessing the impact of additions or changes to existing business functions, 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 organization's Plan can be updated.

The Business Continuity Coordinator is responsible for:

1. Coordinating changes among plans and communicating to the appropriate team members and management when other changes require them to update their plans.

E. Plan Testing Procedures and Responsibilities

Operations is responsible for ensuring the workability of their Business Continuity Plan. This should be periodically verified by active or passive testing.

F. Plan Training Procedures and Responsibilities

HR 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 in a number of ways including; <u>practice exercises</u>, <u>participation in tests</u>, <u>and awareness programs conducted by the Business Continuity Coordinator</u>.

Section II: Business Continuity Strategy

A. Introduction

This section of the Plan describes the strategy devised to maintain business continuity in the event of a <u>facilities disruption</u>. <u>This strategy would be invoked should the Frontera</u> Consulting's primary facilities somehow be damaged or inaccessible.

B. Business Function Recovery Priorities

The strategy is to recover critical business functions at the alternate site location. This can be possible if an offsite strategy has been put into effect.

C. 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		
1441 Broadway Suite 5033, New York, NY 10018	Employee home location		
Fleet House 8-12 New Bridge Street London EC4V6AL	Employee home location		

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.

D. Recovery Plan Phases

The activities necessary to recover from a Frontera Consulting facilities disaster or disruption will be divided into four phases. These phases will follow each other sequentially in time.

1. Disaster Occurrence

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

2. Plan Activation

In this phase, the Business Continuity Plans are put into effect. This phase continues until the alternate facility is occupied and critical business functions reestablished. The major activities in this phase include: **notification and assembly of the recovery teams, implementation of interim procedures, and 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 continues until the primary facility is restored. The primary recovery activities during this phase are backlog reduction and alternate 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.

5. Return to Normal

This phase consists of returning to normal. Once the office location is safe to return all employees and contractors will be notified to return back to office and resume normal activities.

E. Vital Records Backup

All vital records for Frontera Consulting that would be affected by a facilities disruption are maintained and controlled within the cloud on OneDrive. These files are backed up and stored securely via Microsoft Office 365.

All vital documents are typically located in files within the Cloud and one OneDrive and the most current back-up copies are secure.

F. Restoration of Hardcopy Files, Forms, and Supplies

In the event of a facilities disruption, critical may be destroyed or inaccessible. In this case, the last backup of critical documents would be restored from OneDrive.

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. Received and un-opened mail.
- 4. Documents in offices, work cubes and files.

G. On-line Access to Frontera Consulting Computer Systems

In the event of a facilities disruption, all Frontera Consulting departments are enabled to work remotely. All files and documents vital to daily operations are accessed via the cloud.

Section III: Recovery Teams

A. Purpose and Objective

This section of the plan identifies who will participate in the recovery process.

B. 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.

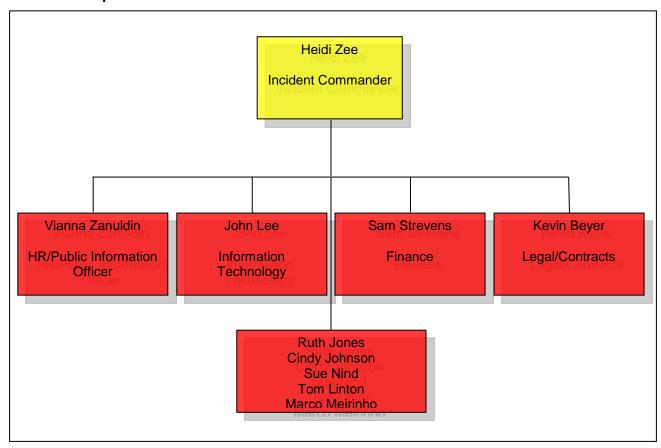
References: Appendix A - Employee Telephone List

C. Team Contacts

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

Reference: Appendix A – Employee Telephone List and Appendix B – Key Supplier and Vendor List

D. Team Responsibilities



Section IV: Recovery Procedures

A. Purpose and Objective

This section of the plan describes the specific activities and tasks that are to be carried out in the recovery process. 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.

B. Recovery Activities and Tasks

PHASE I: Disaster Occurrence

ACTIVITY: Emergency Response and Emergency Operations Center Designation
ACTIVITY IS PERFORMED AT LOCATION: Main Office or Emergency Operations Center
ACTIVITY IS THE RESPONSIBILITY OF THIS TEAM: All Employees

- 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.
 - <u>Note</u>: If the main office is total loss, not accessible or suitable for occupancy, the remaining activities can be performed from home, 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 for all employees to work remotely from their homes. 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 you are able to assist them without causing further injury to them or without putting yourself in further danger, then provide what assistance you can and also call for help. If further danger is imminent, then immediately evacuate the building.
- 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 the corner of 41st Street and 6th Avenue. 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: Business Continuity Coordinator

PRIMARY: Christine Tom

ALTERNATE: Erica Kassler/Jennifer Pepe

TASKS:

1. The Business Continuity Coordinator informs the members of the executive management team and notifies the senior management teamif they have not been informed.

- 2. Personnel are notified of the disaster by following procedures as included in **Section III. D. Recovery Personnel Notification.**
- 3. Depending upon the time of the disaster, personnel are instructed what to do (i.e. stay at home and wait to be notified again, etc.)

ACTIVITY: Preliminary Damage Assessment

ACTIVITY IS PERFORMED AT LOCATION: Main Office Location

ACTIVITY IS THE RESPONSIBILITY OF: Executive Management Team

- 1. 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 posses a threat to personal safety.
- 2. 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.
- 3. Inform all team members that no alteration of facilities or equipment can take place until representatives have made a thorough assessment of the damage and given their written agreement that repairs may begin.
- 4. 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 assessment.
- 5. Ensure that administrative support is available, as required.
- 6. Arrange a meeting to review the disaster declaration recommendation that results from the preliminary damage assessment and to determine the course of action to be taken. With this group, determine the strategy.

ACTIVITY: Declaration of a Disaster

ACTIVITY IS PERFORMED AT LOCATION: Main Office Location or Alternate

Site/Emergency Operations Center

ACTIVITY IS THE RESPONSIBILITY OF: Executive Team

- 1. Actual declaration of a disaster is to be made by the Executive Team.
- Because of the significance, disruption, and cost of declaring a disaster, appropriate facts should be gathered and considered before making the decision to declare a disaster. Individual groups/department personnel should not unilaterally make a decision to declare a disaster. This is responsibility of the Executive Management Team.

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: HR

- 1. Review the recovery strategy and action plan with the appropriate team.
- 2. If necessary, adjust the management team assignments based on which members are available.
- 3. The HR Team contacts employees and tells them to prepare to work remotely.
- 4. 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 Frontera Consulting's ability to recover vital services.

ACTIVITY: Alternative Work Locations

ACTIVITY IS PERFORMED AT LOCATION: Home

ACTIVITY IS THE RESPONSIBILITY OF: All Personnel

- 1. When instructed by the the Executive Team and HR, all employees should make arrangements work remotely.
- 2. All employees are setup to access necessary documents on OneDrive

PHASE III: Alternate Site Operations

ACTIVITY: Alternate Site Processing Procedures ACTIVITY IS PERFORMED AT LOCATION: Home

ACTIVITY IS THE RESPONSIBILITY OF: Management Team

- 1. Communicate with customers regarding the disaster.
- 2. Access missing documents and files and reconstruct, if necessary
- 3. Set up operation

<Department Name> Department Business Continuity Plan

Frontera Consulting Appendices

Section V: Appendices

Appendix A - Employee Telephone List

Appendix B - Key Supplier and Vendor List

Appendix A - Employee Telephone List

	Employee	Title/Function	Office Phone	Home Phone #	Cellular/ Pager #	EMAIL	Time Called	Arrival Time	Comment
UK/ US/ CA	Heidi Zee **	Partner			1 (917) 714-4725	heidi.zee@fronteraconsulting.net			
UK/ US/ CA	Kevin Beyer **	Partner			1 (201) 988-6809	kevin.beyer@fronteraconsulting.net			
UK/ US/ CA	Sam Strevens **	Partner			1 (917) 575-9278	sam.strevens@frotneraconsutling.net			
UK/ US/ CA	John Lee **	Partner			1 (201) 450-4200	john.lee@fronteraconsulting.net			
UK	Chris Phelan	Support			(0) 7900 813106	chris.phelan@fronteraconsulting.net			
UK	Michael Donald	Support			(0) 7911 450698	michael.donald@fronteraconsulting.net			
UK	Paul Ward	Support			(0) 7577 770540	paul.ward@fronteraconsulting.net			
UK	Pia Czerniak	Support			(44) 7920 515833	pia.czerniak@fronteraconsulting.net			
UK	Ruth Jones	Operations *			(44) 7789 393061	ruth.jones@fronteraconsulting.net			
UK	Sue Nind	Director			(44) 7768 877952	sue.nind@fronteraconsulting.net			
UK	Tom King	Director			(44) 7785 255649	tom.king@fronteraconsulting.net			
UK	Nicole Mackew	Director **			(44) 0790 1510770	nicole.mackew@fronteraconsulting.net			
CA	Vianna Zanuldin	Director			1 (647) 801-9770	vianna.zanuldin@fronteraconsulting.net			
US	Christine Tom *	Associate			1 (201) 421-0026	christine.tom@fronteraconsulting.net			
US	Cindy Johnson	Director			1 (770) 329 - 4025	cindy.johnson@fronteraconsulting.net			
US	Coleen Clemetson				1 (516) 313-4280	coleen.clemetson@fronteraconsulting.net			
US	Corey Cain	Director			1 (952) 381-5746	corey.cain@fronteraconsulting.net			
US	Drew Swiift	Director			1 (260) 467-9139	drew.swift@fronteraconsulting.net			
US	Erica Kassler **	Financial Analyst			1 (516) 659-7172	erica.kassler@fronteraconsulting.net			
US	Fred Kao	Director			1 (646) 569-5515	fred.kao@fronteraconsulting.net			

US	Gary Patterson	Director		1 (803) 445-7722	gary.patterson@fronteraconsulting.net		
US	Glen Ryen	Director		1 (201) 410-2678	glen.ryen@fronteraconsulting.net		
US	Hetal Grover	Support		1 (908) 625-4153	hetal.grover@fronteraconsulting.net		
US	Jennifer Pepe **	Associate		1 (914) 930-9883	jennifer.pepe@fronteraconsulting.net		
US	Marco Meirinho	Director		1 (908) 720-0282	marco.meirhino@fronteraconsulting.ent		
US	Neil Kaufman	Support		1 (973) 420-6889	neil.kaufman@fronteraconsulting.net		
US	Stacey McFadden	Director		1 (703) 851-7079	stacey.mcfadden@fronteraconsulting.net		
US	Steve Miller			1 (757) 693-4590	steve.miller@fronteraconsulting.net		
US	Tom Linton	Director		1 (435) 729-9591	tom.linton@fronteraconsulting.net		
US	Vincent Fiore	Support		1 (347) 735-9640	vincent.fiore@fronteraconsulting.net		
UK	Fire, Police, Emergency		999				
US	Fire, Police, Emergency		911				

Indicates Team Leader Indicates Alternate Team Leader

Appendix B – Key Supplier and Vendor List

Supplier	Title/Function	Office Phone #	EMAIL	Time Called	Arrival Time	Comment
Oracle	Customer Service	1-800-392-2999				
Ledger Cloud	Support		support@ledgercloud.com			
Amazon Web Services	Support		https://console.aws.amazon.com/support/home			
Alan Brading	Accounting - UK	+44 (0) 1268 561800	ajb@hbca.co.uk			
James Joy	Accounting – US	(914) 500 - 8505	james@summit-service.com			
Wai Kum To	Accounting – HK		wwwkto@yahoo.com.hk			
Christopher Bates Legal – UK		+44 (0)20 7859 2388	christopher.bates@ashurst.com			