



CRO Regulation S1 Annex 4: IBERCLEAR Business Continuity Special Requirements

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Table of revision

Version	Status	Name	Date	Description
1.0	Final	Jesús Romero de Pablos	13.01.2022	Initial Release of Annex 4: As the storage of documents classified as confidential (C3 or higher) on the i-Connect platform is not authorized, this document describes the requirements, without providing any detailed information. Likewise, any references to links and interdependencies are intentionally removed.
1.1	Final	José María Navamuel	20.09.2022	Annual revision, changes made to adapt BIA 2022 to SIX Business Continuity Lifecycle
1.1	Final	José María Navamuel	01.10.2023	Annual revision, changes made to adapt to the BIA 2023 exercise results

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1. Basics

This annex specifies the special requirements of Iberclear's Business Continuity. Due to its confidentiality (C3: Confidential), this version of the document will describe the objectives and processes, intentionally excluding all content that may be categorized as Confidential.

1.1. Introduction

Sociedad de Gestión de los Sistemas de Registro Compensación y Liquidación de Valores, SAU, (hereinafter referred to as "IBERCLEAR"), as a company of the BME Group 100% owned by SIX participates in the Business Continuity management system of the SIX/BME Group (CRO Regulation S1: "Business Continuity Management"). Furthermore, in compliance with Regulation 909/2014 of the European Parliament, of July 23, 2014 (CSDR) and its implementing regulations, IBERCLEAR, within the framework of the SIX/BME Group's continuity management system, has established, implements and maintains an appropriate business continuity and ITSC strategy aimed at ensuring the preservation of its functions, the timely recovery of operations and the fulfillment of its obligations.

1.2. Objective

With the present annex, IBERCLEAR specifies its management scope in line with the CRO Regulation S1: "Business Continuity Management" and in compliance with CSDR, including:

- IBERCLEAR's Business Continuity Governance.
- The critical functions and processes of IBERCLEAR and its recovery objectives.
- The means and strategy of recovery of its essential services and functions.
- The links and interdependencies identified for the above.

The articulation of IBERCLEAR's Business Continuity function is fundamentally based on 5 tools:

- The Business Continuity Management Regulation (CRO Regulation S1: "Business Continuity Management").
- The Business Continuity Governance, whose main body in the BME Group is the BME Continuity and Risk Committee in which the interests of IBERCLEAR are clearly represented through its Continuity Representative.

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- IBERCLEAR Business Impact Analysis (BIA) and IBERCLEAR Risk Inventory.
- The Business Continuity Plan and the ITSC Plans for all systems / functions identified as critical.
- The performance of annual tests of the entire Business Continuity Management System to ensure that both the Business Continuity Management Regulation and the Business Continuity Plan as well as their associated procedures are adapted to the needs of IBERCLEAR.

1.3. Internal Requirements

The main internal BCM requirements of IBERCLEAR are as follows:

- CRO Policy R1: SIX Risk Policy
- CRO Policy S1: SIX Security Policy
- CRO Regulation S1: Business Continuity Management
- CRO Regulation S7: Emergency and Crisis Management

2. Content

IBERCLEAR, as part of the BME Group, participates in the Business Continuity management system of the SIX/BME Group established in the CRO Regulation S1: "Business Continuity Management".

Consistent with the provisions of the CSD Regulation, the contents of this annex reflect IBERCLEAR's business continuity specialties arising from the supervised activity that develops.

2.1. Roles and Responsibilities

IBERCLEAR has its own Business Continuity Structure that is integrated and aligned with the SIX/BME Business Continuity Organization. The different roles and bodies in IBERCLEAR related to the Business Continuity structure are identified below, as well as their responsibilities on this matter.

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2.1.1. IBERCLEAR BoD

The Board of Directors of IBERCLEAR is the competent body responsible for approving the Business Continuity Management Regulation and the Business Continuity Plan within the Company scope, as established in article 6, section 2.m, of IBERCLEAR Board of Directors Rules.

Likewise, it is responsible for ensuring the correct management of business continuity within the Company, in coordination with the bodies entrusted with the management of business continuity within the SIX/BME Group, on which IBERCLEAR is a part.

2.1.2. IBERCLEAR Risk Committee

IBERCLEAR Board of Directors counts on IBERCLEAR Risk Committee which, as an advisory committee of this body on the current and future global strategy and appetite of the Company with regards to risks, advises the Board of Directors on the Business Continuity Management Regulation and the Business Continuity Plan prior to its approval.

2.1.3. IBERCLEAR Chief Risk Officer (CRO)

When defining business continuity as part of the Company's risks, IBERCLEAR Chief Risk Officer assumes the role of the Company's Continuity Representative, thus becoming responsible for coordinating the Business Continuity provisions within IBERCLEAR.

The main functions in this area are:

- Facilitate the compilation and changes on requirements of the critical systems of IBERCLEAR.
- Represent and safeguard the interests of IBERCLEAR within the Continuity and Risk Committee within the BME Group.
- Keep the Board of Directors of IBERCLEAR informed of any relevant situation that affects business continuity or any relevant issue dealt with in the Continuity and Risk Committee.

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2.2. IBERCLEAR Critical Processes and Recovery Objectives

During the performance of the corresponding Business Impact Analysis (BIA), IBERCLEAR has identified and defined its processes and essential functions for Business Continuity, as well as the IT systems that support them.

A single Business Impact Analysis (BIA) has been carried out for the CSD processes, one for the PTI service, and one for the RENADE service. The processes included in these BIAs are detailed below:

2.2.1. Notary Service (Part of the CSD BIA)

IBERCLEAR core service related to the initial registration of securities in the Central Register for which IBERCLEAR has been designated as the entity in charge of the book-entry register by the issuer, pursuant article 49 of CSDR; as well as when it acts as an issuer CSD. It also includes the listing and de-listing of securities as a consequence of corporate actions that modify the "Lote de Control" of an issuance.

2.2.2. Central Maintenance Service (Part of the CSD BIA)

IBERCLEAR core service that includes services related to the provision and maintenance of accounts in the Central Register.

2.2.3. Settlement Service (Part of the CSD BIA)

IBERCLEAR core service that includes services related to the management of the ARCO Settlement System.

2.2.4. Links Service (Part of the CSD BIA)

IBERCLEAR ancillary service related to the services offered to participant entities on securities from a link where IBERCLEAR acts as investor CSD (asset services); as well as the specific services offered to other CSD that have opened an account in IBERCLEAR as issuer CSD.

2.2.5. RENADE Service

Ancillary service of IBERCLEAR that includes the management, maintenance and support to the holders of the accounts opened within the Spanish Area of the Union Registry. Management is carried out by accessing the external platform developed and maintained by the European Commission via Internet.

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2.2.6. Information Management System (PTI)

The information management system function guarantees transaction traceability from the moment where trade takes place until settlement and registration are performed, as well as knowing the status of the transaction itself. It also facilitates the transmission of information and the control of risks and guarantees required by the corresponding entities and market infrastructures.

2.2.7. Recovery Objectives

In addition, IBERCLEAR has defined the Recovery Time Objective (RTO), the Recovery Point Objective (RPO) and the Maximum Tolerable Period of Downtime (MTPD) for each essential service identified.

For confidentiality reasons, the values of the recovery objectives have been intentionally removed from the document.

2.3. Business Continuity Strategy and means

IBERCLEAR has all the necessary means to ensure the continuity and recovery of its essential services and functions within the established target recovery times.

The main strategy established by IBERCLEAR to ensure the continuity of its essential functions, and therefore the continuity of its business, is to ensure the redundancy all those elements that support the critical functions of Company. Fundamentally:

- Hybrid teleworking model, where half of the staff is working from the office and the other half in a work from home model, to minimize incident response times.
- Main strategy in the event of building unavailability is a remote work model. In addition, an alternative work center with sufficient capacity to host the functions required by IBERCLEAR, to which workers can move at an appropriate time.
- Geographically diversified Data Processing Centers that allow the recovery of all functions within the stipulated target times.
- Availability of workstations with remote access capacity for all personnel considered critical.
- Training of personnel to carry out tasks under critical business circumstances.



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IBERCLEAR has developed and continuously updates the different Continuity Procedures (communication, activation, transfer to the alternative center...) established in the provisions applicable in case of emergency and which are included in the Business Continuity Plan.

2.4. Links and Interdependencies

The links and interdependencies existing for each of the services provided by IBERCLEAR and that have been identified during the corresponding Business Impact Analysis are described below.

For confidentiality reasons, the links and interdependencies of Iberclear's services have been intentionally omitted from the document.

3. Contact

For questions regarding this document please contact: corporate-security@six-group.com

This document is available in different language versions. In case of doubt, the English version takes precedence.

4. Effective date

This revised annex enters into force on 01.10.2023.

Jos Dijsselhof

CEO