

1 Introduction

As a modern, forward-looking bank, Union Bank of Nigeria recognises at senior levels the need to ensure that its business operates smoothly and without interruption for the benefit of its customers, shareholders and other stakeholders.

To provide such a level of continuous operation, Union Bank of Nigeria has implemented a Business Continuity Management System (BCMS) in line with the International Standard for Business Continuity Management, ISO22301.

The operation of this BCMS has many benefits for the business, including:

- Protection of revenue streams and company profitability;
- Ensuring the supply of goods and services to customers;
- Maintenance and enhancement of shareholder value; and
- Compliance with legal and regulatory requirements.

It is important to understand which areas of the business are currently within the umbrella of the BCMS and which are excluded. The boundaries of the BCMS as implemented within Union Bank of Nigeria are defined within the document entitled "Business Continuity Context, Requirements and Scope". It is recommended that this document should be reviewed in conjunction with this policy.

The purpose of this document is to define an overall policy regarding business continuity that is appropriate to the purpose of Union Bank of Nigeria, and includes:

- A framework for setting business continuity objectives;
- A commitment to satisfying applicable requirements; and
- A commitment to continual improvement of the BCMS.

This BCMS Policy is available in both paper and electronic form and will be communicated within the organisation to all relevant stakeholders and interested third parties.

2 Setting Business Continuity Objectives

The high-level objectives for business continuity within Union Bank of Nigeria are defined within the document “Business Continuity Context, Requirements and Scope”. These are fundamental to the nature of the business and should not be subject to frequent change.

These overall objectives will be used as guidance in the setting of lower level, more short-term objectives for business continuity planning within an annual cycle timed to coincide with organisational budget planning. This will ensure that adequate funding is obtained for the improvement activities identified. These objectives will be based upon a clear understanding of the overall business requirements and how they may change during the year.

Business continuity objectives will be documented in the Business Continuity Management Plan for the relevant financial year, together with details of a plan for how they will be achieved. Once approved, this plan will be reviewed periodically as part of the management review process, at which time the objectives will also be reviewed to ensure that they remain valid. If amendments are required, these will be managed through the organisational change management process.

3 Commitment to Satisfying Applicable Requirements

Commitment to the delivery of business continuity extends to senior levels of the organisation and will be demonstrated through this Business Continuity Policy and the provision of appropriate resources to establish and develop the Business Continuity Management System.

Top management will also ensure that a systematic review of performance of the programme is conducted on a regular basis to ensure that quality objectives are being met and quality issues are identified through the audit programme and management processes. Management Review can take several forms including departmental and other management meetings.

Within the field of Business Continuity Management, there are several key roles that need to be undertaken to ensure the success of the BCMS and protect the business from risk.

The Business Continuity Manager shall have overall authority and responsibility for the implementation and management of the Business Continuity Management system, specifically:

- The identification, documentation and fulfilment of applicable requirements;
- Assigning authorities and responsibilities for the implementation, management and improvement of BCM processes;
- Integration of business processes with the BCMS;
- Compliance with statutory, regulatory and contractual requirements in the management of assets used to deliver products and services; and
- Reporting to top management on performance and improvement of the BCMS.

It is also the responsibility of the Business Continuity Manager to ensure that employees understand the roles they are required to fulfil and that they have appropriate skills and competence to do so.

Union Bank of Nigeria will ensure that all employees involved in business continuity management are competent based on appropriate education, training, skills and experience.

The skills required to ensure business continuity will be determined and reviewed on a regular basis together with an assessment of existing skill levels within Union Bank of Nigeria. Training needs will be identified, and a plan maintained to ensure that the necessary competencies are in place.

Training, education and other relevant records will be kept by the Human Resources Management Department to document individual skill levels attained.

Full details of the responsibilities associated with each of the required roles and how they are allocated within Union Bank of Nigeria are given in a separate document entitled "Business Continuity Management Roles, Responsibilities and Authorities".



Union Bank of Nigeria makes use of various third parties, both internal and external, in the delivery of products and services to its customers. Where this involves the operation of a business process, or a part of the process on behalf of Union Bank of Nigeria, that falls within the defined scope of the BCMS, this is identified in the Business Continuity Management Plan.

In all cases, Union Bank of Nigeria will retain governance of the relevant BCM processes by demonstrating:

- Accountability for the process;
- Control of the definition of and interface to the process;
- Performance and compliance monitoring; and
- Control over process improvements.

This will be evidenced by documents and records such as contracts, meeting minutes and performance reports.

4 Continual Improvement of the BCMS

Union Bank of Nigeria's policy regarding Continual Improvement of the BCMS is to:

- Continually improve the effectiveness of the Business Continuity Management System across all areas within scope;
- Enhance current processes to bring them into line with good practice as defined within ISO 22301;
- Achieve ISO 22301 certification and maintain it on an on-going basis;
- Increase the level of proactivity (and the business perception of proactivity) regarding the on-going management of business continuity;
- Achieve an enhanced understanding of and relationship with the business units to which the BCMS applies;
- Review relevant metrics on an annual basis to assess whether it is appropriate to change them, based on collected historical data and feedback from relevant sources;
- Obtain ideas for improvement via regular review meetings with stakeholders and document them in a Continual Improvement Plan; and
- Review the Continual Improvement Plan at regular management meetings to prioritise and assess timescales and benefits.

Ideas for improvements may be obtained from any source including customers, suppliers, employees, risk assessments and audits. Once identified they will be added to the Continual Improvement Plan and evaluated by the staff member responsible for Continual Improvement.

As part of the evaluation of proposed improvements, the following criteria will be used:

- Cost;
- Business Benefit;
- Risk;
- Implementation timescale; and
- Resource requirement.

If accepted, the improvement proposal will be prioritised to allow more effective planning. For more detail see document Procedure for Continual Improvement.