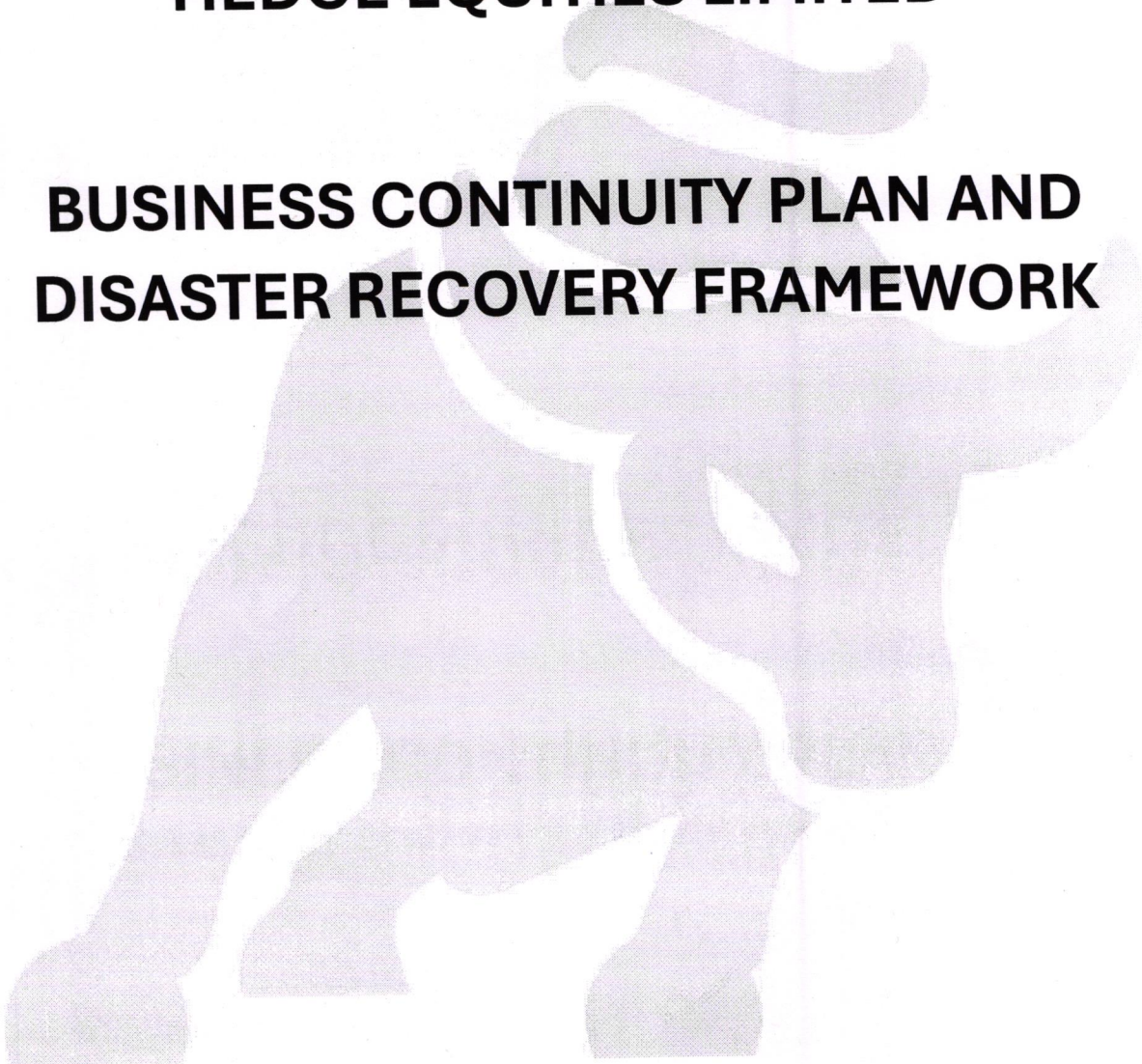


HEDGE EQUITIES LIMITED

BUSINESS CONTINUITY PLAN AND DISASTER RECOVERY FRAMEWORK



HEDGE EQUITIES LIMITED

Registered Office: B 302 Trade Square, Mehra Compound, Near DSK Madhuban, Sakinaka Kurla Road, Andheri East, Mumbai – 400 072

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CIN: U65990MH2007PLC176866

A. INTRODUCTION

This Business Continuity Plan (BCP) and Disaster Recovery (DR) Framework has been prepared for Portfolio Managers in accordance with the regulatory framework prescribed by the Securities and Exchange Board of India (SEBI) for operational resilience, disaster recovery preparedness, cyber resilience, and continuity of critical market operations.

The objective of this framework is to ensure continuity of critical business functions during disruptive events, minimize operational and financial losses, protect investor interests, maintain compliance with regulatory requirements, and ensure timely restoration of systems and services.

The framework applies to all critical business operations including trading systems, portfolio management operations, risk management systems, settlement processes, client servicing platforms, cybersecurity infrastructure, communication systems, and third-party service dependencies.

B. GOVERNANCE FRAMEWORK

The Board of Directors shall approve the BCP and review its effectiveness periodically. Senior management shall ensure adequate infrastructure, staffing, monitoring mechanisms, and disaster recovery capabilities are maintained at all times.

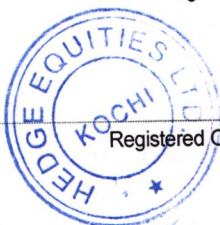
A Business Continuity Steering team comprising departments of technology, operations, risk management, compliance, cybersecurity, and administration shall oversee implementation of the framework, conduct periodic reviews, monitor DR drill results, and ensure compliance with SEBI guidelines.

An Incident Response Team shall be constituted for handling disruptions and disaster situations. The team shall coordinate operational recovery, system restoration, communication with stakeholders, and implementation of recovery procedures.

C. DISASTER SCENARIOS

In addition to the definition prescribed by SEBI, the following events shall be treated as disasters requiring activation of the BCP and DR framework:

- Failure of primary data centers, servers, databases, or network infrastructure.
- Cybersecurity incidents such as ransomware attacks, malware infections, unauthorized access, or denial-of-service attacks.
- Failure of trading systems, order management systems, risk management systems, or settlement applications.
- Telecom disruptions, cloud service outages, or vendor failures affecting critical operations.
- Fire, flood, earthquake, cyclone, pandemic situations, civil unrest, or terrorist incidents.
- Exchange outages, trading halts, depository disruptions, or clearing corporation failures.
- Extended power outages or utility failures affecting operational continuity.
- Human errors or operational lapses causing material disruption to critical systems or services.



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D. STANDARD OPERATING PROCEDURE IN THE EVENT OF DISASTER

Upon identification of any incident affecting critical systems or business operations, the incident shall immediately be reported to the Information Technology Team (IT Team) for assessment. The incident shall be classified based on severity, operational impact, and potential regulatory implications.

Where the disruption materially impacts critical operations, the IT Team in consultation with senior management shall formally declare a disaster and activate the Disaster Recovery framework.

The IT Team shall initiate failover procedures to the Disaster Recovery Site and restore critical applications, databases, connectivity links, and communication systems. System validation checks shall be performed to ensure data integrity and operational readiness.

Business teams shall continue essential operations through alternate work arrangements and ensure continuity of client servicing, trade monitoring, settlement processing, risk management, and regulatory reporting.

The Compliance Officer shall coordinate all regulatory reporting requirements and ensure timely communication with SEBI, stock exchanges, depositories, and clearing corporations.

Once the primary infrastructure is stabilized, migration back to the primary environment shall be undertaken in a controlled manner after reconciliation and validation of all transactions and records.

A post-incident review including root cause analysis, recovery timelines, impact assessment, and corrective actions shall be conducted after closure of the incident.

E. ESCALATION HIERARCHY

The organization shall maintain a clearly defined escalation mechanism for timely handling of incidents and disasters.

The escalation hierarchy shall broadly operate as follows:

- Level 1: IT Team and Operations Team for initial incident logging and assessment.
- Level 2: IT Team for technical containment and impact analysis.
- Level 3: Senior Management for strategic decisions and regulatory coordination.
- Level 4: Board of Directors for oversight and governance.

The escalation matrix shall define timelines, responsibilities, reporting obligations, and communication channels for each level of incident severity.

The organization shall maintain updated contact details of key personnel, exchanges, depositories, banks, telecom providers, vendors, and emergency support agencies.



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F. COMMUNICATION PROTOCOLS

The organization shall maintain a structured communication framework for internal and external communication during disaster situations.

Internal communication shall be coordinated through:

- Official email systems
- SMS alerts
- Emergency contact channels
- Collaboration platforms
- Internal communication portals
- Telephonic conference bridges

Employees shall be informed regarding operational arrangements, recovery activities, escalation contacts, and continuity procedures.

External communication shall be managed in a controlled manner by authorized personnel. The Compliance Officer shall ensure timely communication with SEBI, exchanges, depositories, clearing corporations, and other regulatory authorities.

Clients shall be informed regarding:

- Nature of the disruption
- Expected restoration timelines
- Alternate support arrangements
- Impact on trading or settlement activities
- Precautionary measures, where applicable

Communication with clients may be undertaken through email, SMS, website notifications, mobile applications, or helpline services.

Only authorized spokespersons shall communicate with media or external agencies regarding incidents.

G. DOCUMENTATION AND RECORD KEEPING

The organization shall maintain complete records relating to disaster incidents, DR drills, communication logs, system restoration activities, testing results, recovery timelines, audit findings, and corrective actions.

Documentation pertaining to DR drills shall include scope of testing, systems covered, issues identified, corrective measures, participant details, and management approvals.

All records shall be retained in accordance with applicable SEBI regulations and internal record retention policies.

System-generated logs and audit trails shall be securely maintained and protected from unauthorized alteration.



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H. PREPAREDNESS FOR CRITICAL SYSTEM FAILURES

The organization shall periodically conduct simulations and DR drills to evaluate preparedness for various disruption scenarios including data center failures, cyber attacks, trading application failures, network outages, cloud disruptions, pandemic situations, and insider threats.

Testing activities shall validate recovery timelines, system resilience, communication effectiveness, data integrity, and operational continuity.

Corrective actions arising from drills and testing exercises shall be tracked and implemented within defined timelines.

I. PREPAREDNESS FOR TRADING HALT AND DEPOSITORY DISRUPTIONS

The organization shall maintain contingency procedures to address disruptions arising from trading halts, exchange outages, settlement disruptions, and depository-related failures.

Appropriate coordination mechanisms shall be maintained with stock exchanges, clearing corporations, National Securities Depository Limited (NSDL), and Central Depository Services (India) Limited (CDSL).

The organization shall monitor settlement obligations, client positions, risk exposures, and reconciliation processes during such disruptions to minimize operational and settlement risks.

J. MONITORING FRAMEWORK FOR CRITICAL SYSTEMS

The organization shall maintain continuous monitoring mechanisms for all critical systems and infrastructure components.

Monitoring activities shall cover infrastructure performance, application availability, database health, network connectivity, cybersecurity events, backup status, data replication, and system capacity utilization.

Automated alerts shall be configured for system downtime, security incidents, failed transactions, abnormal system behavior, replication failures, and other operational anomalies.

The organization shall periodically conduct vulnerability assessments, penetration testing, patch management reviews, and cybersecurity monitoring activities to strengthen resilience.

K. BACKUP AND DISASTER RECOVERY ARRANGEMENTS

Critical systems and databases shall be backed up on a real-time or near real-time basis. Backups shall be encrypted, securely stored, and periodically tested for restoration integrity.

The Disaster Recovery Site shall be geographically separated from the primary site and capable of supporting critical business operations within the defined Recovery Time Objective (RTO) and Recovery Point Objective (RPO).

Periodic DR drills shall be conducted to validate failover capabilities, operational readiness, recovery timelines, and business continuity arrangements.



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L. TRAINING, TESTING, AND REVIEW

Employees shall undergo periodic training on business continuity procedures, cybersecurity awareness, incident reporting, and disaster response mechanisms.

The organization shall conduct DR drills and tabletop exercises at periodic intervals in accordance with SEBI requirements.

The BCP and DR framework shall be reviewed annually or whenever significant operational, technological, or regulatory changes occur.

CONCLUSION

This Business Continuity Plan and Disaster Recovery Framework establishes the processes and controls necessary to ensure operational resilience, continuity of critical services, protection of client interests, and compliance with SEBI regulations during disruptive events.

The organization shall continue to strengthen its continuity preparedness through periodic testing, technology upgrades, cybersecurity enhancements, employee awareness, and ongoing monitoring of critical systems.

This Business Continuity Plan and Disaster Recovery Framework establishes a structured and comprehensive mechanism to ensure operational resilience, regulatory compliance, investor protection, and continuity of critical market operations during disruptive events.

The organization remains committed to continuously strengthening its resilience capabilities through periodic testing, technology upgrades, employee awareness, cybersecurity enhancements, and alignment with SEBI regulations and industry best practices.

The above policy is placed before the Meeting of the Board of Directors of the Company dated 21st April, 2026 and duly approved.



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