



Business Continuity Policy Statement

allpay Limited is committed to maintaining the continuity of critical business operations and services in the event of disruption. We will implement, maintain, and continually improve a Business Continuity Management System (BCMS) to ensure resilience, minimise impact, and enable timely recovery aligned with our strategic objectives, regulatory obligations, and stakeholder expectations.

This policy applies to all employees, contractors, and third parties who support or deliver critical services.

allpay Limited is a provider of financial payment services, bill payments, prepaid cards, direct debits and fund disbursements. We also design and manufacture swipe and chip cards, client cards and stationery products from our Whitestone site.

allpay has established, implemented, and maintains a Business Continuity Management System (BCMS).

allpay Limited is committed to:

- Protect life, safety, and wellbeing
- Maintain the delivery of critical products/services
- Minimise financial, legal, and reputational impact
- Ensure compliance with regulatory and contractual obligations
- Support rapid recovery and return to normal operations

Detailed arrangements and the scope of the management system are defined within the Business Continuity Plan (BP16) and supporting BCMS documentation.

A handwritten signature in black ink, reading "Anthony Martin Killeen". The signature is written in a cursive style with a long horizontal line underneath.

Tony Killeen
CEO

July
2026

Business Continuity Roles and Responsibilities

Top Management (Directors / Senior Leadership Team)

Top Management retains overall accountability for the effectiveness of the BCMS and shall:

- Approve the Business Continuity Policy
- Provide strategic direction and funding
- Ensure alignment with organisational risk appetite
- Review BC performance and resilience posture

Finance, IT & HR – Led by the Finance Director, IT Director & HR Director

Key tasks:

- Oversee the restoration of IT capabilities
- Make emergency funds available and provide insurance advice
- Ensure payments to staff and customers are made on time
- Ensure staff welfare and oversee the diversion of staff to critical duties
- Transfers of data to secure resilient servers, DR databases and backup storage facilities

Buildings, Assets, Salvage & Safety – Led by Head of Facilities, Head of Legal & HSE Officer

Key tasks:

- Providing safe, functional and secure office accommodation
- Assessing the condition of damaged buildings
- Identifying viability of alternative office accommodation
- Maintaining an inventory of losses
- Providing contractors to undertake salvage and reinstatement
- Management of contractors, utilities and equipment
- Work with IT to salvage IT equipment & data

Customer Service & Communications – Led by Managing Director or appointed deputy, Head of Client Services & Head of Marketing

Key tasks:

- Internal & external Communications
- Continuity of front-line customer services
- Out-of-Hour's service operation
- Website/Intranet Information

Business Continuity Manager

Business Continuity Manager shall:

- Develop and maintain the BCMS framework (aligned to ISO 22301)
- Conduct Business Impact Analyses (BIA) and risk assessments
- Develop and maintain business continuity plans (BCPs)
- Coordinate training, exercising, and awareness programmes

- Monitor compliance and continuous improvement
- Support incident response and recovery coordination
- Champion business continuity across allpay
- Ensure BCMS is established, implemented, and maintained
- Report on resilience and incidents to the Board
- Resolve cross-functional issues
- Provide specialist support to SIT and the Business Recovery Teams. To ensure that procedures in this Business Continuity Plan are adhered to

HSE Advisor

HSE Advisor shall:

- Provide specialist advice to SIT regarding the establishment of a safe working environment for staff and contractors.
- Responsible for the evacuation, together with the Head of Facilities, of staff from the premises and facilitating their safe re-entry, if applicable
- Maintain equipment to ensure optimal energy efficiency
- Support energy monitoring activities
- Implement energy-efficient technologies and upgrades
- Ensure new installations meet energy performance requirements

All Employees

All employees shall:

- Be aware of business continuity procedures relevant to their role
- Participate in training and testing
- Report incidents or disruptions promptly
- Follow instructions during incidents

Communication and Assurance

This policy will be communicated across all levels of the organisation via SharePoint and other internal communications as appropriate. Compliance with this policy is mandatory.

Regular audits, tests, and exercises will be conducted.

Non-compliance will be addressed through governance processes.

Continuous Improvement and Review

This policy will be reviewed annually or following significant change.

Continuous improvement will be ensured by the process of regular testing and exercises, providing continued assurance to all interested parties that we will be able to continue operations in the event of an incident and will respond accordingly. Lessons learned from incidents and exercises will be implemented.

Metrics and KPIs will drive ongoing improvement.