



An integral part of Omgeo’s Business Continuity Program is achieving compliance with regulatory requirements and implementing best practices. Through frequent reviews by the SEC, Internal Audit and Omgeo, we ensure compliance with industry wide recognized good practice guidelines and industry standards outlined in the Interagency Paper on Sound Practices, British Standard (BS) 25999 and Business Continuity Institute (BCI) Good Practice Guidelines.

Omgeo Business Continuity Management Compliance with Best Practices and Industry Guidelines					
		In Compliance	Partially in Compliance	Not in Compliance	Not Applicable
Interagency Paper on Sound Practices to Strengthen the Resilience of the U.S. Financial System <i>(issued by the Federal Reserve Board, Office of the Comptroller of the Currency, and the Securities and Exchange Commission)</i>	Identify clearing and settlement activities in support of critical financial markets	X			
	Determine appropriate recovery and resumption objectives for clearing and settlement activities in support of critical markets	X			
	Maintain sufficient geographically dispersed resources to meet recovery and resumption objectives	X			
	Routinely use or test recovery and resumption arrangements	X			
BS25999 (set by British Standards Institution), and BCI Good Practice Guidelines	BCM Program <ul style="list-style-type: none"> ▪ Strategy ▪ Relationship with Risk Management ▪ Lifecycle 	X			
	BCM Policy <ul style="list-style-type: none"> ▪ Set-up activities for establishing a business continuity capability ▪ Ongoing management and maintenance ▪ Viability of key suppliers’ continuity plans and their exercising and maintenance programs 	X			
	BCM Program Management	X			

	<ul style="list-style-type: none"> ▪ Assigning responsibilities ▪ Implementing business continuity in the organization ▪ Ongoing management of business continuity 				
	<p>Understanding the Organization</p> <ul style="list-style-type: none"> ▪ Business Impact Analysis (BIA) ▪ Identification of critical activities ▪ Determining continuity requirements ▪ Risk assessment 	X			
	<p>Business Continuity Strategy</p> <ul style="list-style-type: none"> ▪ Implement appropriate measures to reduce the likelihood of incidents occurring and/or reduce the potential effects of those incidents ▪ Take account of the resilience and mitigation measures ▪ Provide continuity for its critical activities during and following an incident ▪ Take account of those activities that have not been identified as critical. ▪ Identify appropriate strategies for maintaining core skills and knowledge ▪ Reduce the impact of the unavailability of its normal worksite ▪ Ensure that information vital to the organization's operation is protected and recoverable according to the timeframes described within the BIA 	X			
	<p>Planning and Response Structure</p> <ul style="list-style-type: none"> ▪ Development and implementation of appropriate plans and arrangements to ensure continuity of critical activities, and the management of an incident <ul style="list-style-type: none"> ○ Incident response structure 	X			



	<ul style="list-style-type: none"> ○ BC plans ○ Media response ○ Stakeholder management 				
	Exercising, Maintaining and Reviewing BCM Arrangements <ul style="list-style-type: none"> ▪ Exercise program ▪ Maintenance program ▪ Review program – audit and self assessment 	X			
	Embedding BCM in the organization's culture <ul style="list-style-type: none"> ▪ Building, promoting and embedding a BCM culture <ul style="list-style-type: none"> ○ Leadership from senior personnel in the organization ○ Assignment of responsibilities ○ Awareness raising; ○ Skills training ○ Exercising plans. 	X			
U.S. FFIEC Guidelines	Governance	X			
	Crisis Management Structure	X			
	Regulatory Oversight	X			
	Training and Testing Program	X			
	Government and Community Participation	X			