

# Chromewell Engineering Private Limited

## Policy on Business Continuity

POLICY NO: CW-ENV-001 | VERSION: 4.0

ISSUE DATE: JAN 2026 | NEXT REVIEW: JAN 2027 | SUPERSEDES: V3.0 (JUNE 2025)

**Table of contents**

Table of contents .....	2
1. Document Information:.....	2
2. Purpose.....	2
3. Scope .....	3
4. Roles and Responsibility.....	<b>Error! Bookmark not defined.</b>
5. Risk Assessment and Business Impact.....	<b>Error! Bookmark not defined.</b>
6. Policy Commitments .....	4
<b>6.1 Business Continuity Planning</b> .....	4
<b>6.2 Emergency Preparedness and Response</b> .....	4
<b>6.3 Operational and Supply Chain Resilience</b> .....	4
<b>6.4 Communication and Awareness</b> .....	4
<b>6.5 Compliance and Continuous Improvement</b> .....	4
7. Emergency Response and Crisis Management .....	<b>Error! Bookmark not defined.</b>
8. Policy Review Mechanism .....	5
9. Formal Approval and Sign-Off.....	5

**1. Document Information:**

Document Details		Governance
<b>Policy Owner:</b> Head of Operations / Business Continuity Coordinator	<b>Scope:</b> All Chromewell Engineering Pvt Ltd manufacturing operations, warehouses, offices, IT systems, utilities, logistics activities, supply chain operations, and critical business functions across all owned, leased, and operated locations in Pune, Dewas, and other operational sites. Covers preparedness, response, recovery, and continuity planning for disruptions affecting business operations.	<b>Reviewed &amp; Approved By:</b> CEO & CFO
<b>Secondary Owner:</b> HR HOD / Compliance Executive	<b>Applies To:</b> All employees, contractors, consultants, suppliers, service providers, and business partners involved in critical business operations, emergency response, operational continuity, IT infrastructure, logistics, and support functions.	<b>Review Cycle:</b> Annual – Once a year

**2. Purpose**

Chromewell Engineering Pvt Ltd is committed to ensuring the continuity of critical business operations during disruptions, emergencies, crises, or unforeseen events. This Business Continuity Policy establishes the framework and guiding principles for maintaining operational resilience, protecting employees and assets, minimising business interruptions, and ensuring timely recovery of critical functions.

The purpose of this policy is to ensure that Chromewell can effectively respond to incidents such as natural disasters, fire, equipment failures, cyber incidents, utility disruptions, supply chain interruptions, health emergencies, labour disruptions, or other operational risks that may impact business continuity.

This policy is aligned with Chromewell's Code of Conduct and Ethics, risk management practices, emergency preparedness procedures, health and safety requirements, information security standards, and applicable legal and regulatory obligations.

### 3. Scope

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This policy applies to:

- All Chromewell Engineering Pvt Ltd manufacturing units, warehouses, offices, logistics operations, utilities, IT systems, and support functions across all owned, leased, and operated locations.
- All employees, contractors, consultants, temporary workers, suppliers, service providers, and third parties involved in critical business operations or continuity activities.
- All critical business functions including manufacturing, procurement, supply chain, finance, HR, IT infrastructure, customer support, logistics, utilities, compliance, and administration.
- All potential business disruption scenarios including natural disasters, fire, equipment breakdowns, cyber incidents, pandemics, power failures, labour disruptions, transportation interruptions, supplier failures, and other emergencies.
- All business continuity, emergency response, crisis management, disaster recovery, communication, and operational recovery activities undertaken by Chromewell.
- The following areas are specifically covered under this policy:
  - Business continuity planning and risk assessment
  - Emergency preparedness and incident response
  - Crisis communication and escalation procedures
  - IT disaster recovery and data protection
  - Supply chain and operational continuity management
  - Recovery of critical business functions and infrastructure
  - Employee awareness, training, and business continuity drills
  - Monitoring, review, and continuous improvement of continuity plans

### 4. Roles and Responsibilities

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- **Business Continuity Manager (BCM)**
  - Development and maintains the Business Continuity Plan (BCP)
  - Coordinates periodic testing, training, and updates.
  - Leads the organization's response during a business disruption.
- **Crisis Management Team (CMT)**
  - Provides leadership during emergency situations.
  - Approves major continuity decisions and communicates with external stakeholders.
  - Includes representatives from executive leadership, HR, IT, and Legal.
- **Department Heads**
  - Identify critical processes within their departments.
  - Maintain department-specific recovery plans.
  - Ensure team members are aware of their roles and responsibilities during incidents.
- **IT and Infrastructure Team**
  - Ensure availability of data backups and redundant systems.
  - Manage disaster recovery and cybersecurity protection.

- Maintain offsite storage and cloud failover arrangements.
- **Human Resources (HR)**
  - Maintain updated employee contact lists and emergency contacts.
  - Coordinate communication, support, and employee safety protocols.
- **All Employees**
  - Participate in training and drills.
  - Follow emergency procedures and continuity protocols.
  - Report incidents and comply with continuity guidelines.

## 5. Risk Assessment and Business Impact Analysis

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At Chromewell, we require an annual Risk Assessment to identify internal and external threats, including but not limited to cyberattacks, fire, flood, pandemics.

The BCM is required to identify critical business functions and formulate risk mitigation strategies along with the Heads of Departments. BCM is also required to compute the number of days that the operations can run and sustain in the event of a total system shutdown.

The involvement of the HOD of IT is mandatory in formulating any disaster recovery plan, with a special emphasis on recovery time after a full or partial shutdown.

## 6. Policy Commitments

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### 6.1 Business Continuity Planning

- Chromewell shall maintain and periodically review business continuity and disaster recovery plans for critical operations and functions.
- Critical business processes and operational risks shall be identified and assessed regularly.

### 6.2 Emergency Preparedness and Response

- Chromewell is committed to responding effectively to emergencies, disruptions, and crisis situations to minimise operational impact and ensure employee safety.
- Emergency response procedures and escalation mechanisms shall be established and communicated to relevant personnel.

### 6.3 Operational and Supply Chain Resilience

- Chromewell shall take proactive measures to reduce disruption risks across manufacturing, logistics, utilities, IT systems, and supply chain operations.
- Alternative arrangements and recovery strategies shall be developed for critical business activities wherever feasible.

### 6.4 Environmental Incident Prevention and Response Communication and Awareness

- Employees and relevant stakeholders shall be informed of their roles and responsibilities during business disruptions or emergencies.
- Periodic awareness programs, drills, and training sessions shall be conducted to strengthen preparedness and response capabilities.

### 6.5 Transparent Reporting Compliance and Continuous Improvement

- Chromewell shall comply with applicable legal, regulatory, customer, and operational continuity requirements.

- Business continuity plans and response mechanisms shall be reviewed, tested, and improved periodically based on operational needs, incidents, and lessons learned.

## 7. Emergency Response and Crisis Management

The BCM will prepare, train, circulate and create awareness periodically on:

- Emergency Response Plan (ERP): Procedures for evacuation, first aid, fire safety, lockdown, or shelter in-place.
- Crisis Management Team: Activated during significant disruptions to manage response and recovery.
- Authority lines to be followed when an incident is declared and business continuity protocols are activated.
- Emergency contact numbers and escalation paths.


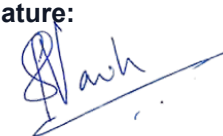

## 8. Policy Review Mechanism

This policy is reviewed annually every April by the EHS Executive and Compliance Executive, with formal approval by the CEO. Interim review is triggered by a significant environmental incident, a major change to applicable environmental legislation, the introduction of a new manufacturing process with significant environmental aspects, findings from an ISO 14001 surveillance audit, or a change in Chromewell's ESG strategy.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	Head of Finance/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	Head of Finance/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	Head of Finance/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	Head of Finance/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

## 11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
<b>Name:</b> Mr. Mandar Vikar <b>Designation:</b> Head of Finance <b>Date:</b> Jan 2026 <b>Signature:</b> 	<b>Name:</b> Ms. Risha Naik <b>Designation:</b> CFO <b>Date:</b> Jan 2026 <b>Signature:</b> 	<b>Name:</b> Mr. Amardeep Mardhekar <b>Designation:</b> CEO <b>Date:</b> Jan 2026 <b>Signature:</b> 

**FOR FURTHER INFORMATION:**

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.