



208 Progressive Square
Shahra-e-Faisal Block 6, Nursery
Karachi - 75400
Ph: 0092 21 437 1241
Fx: 0092 21 437 1242
Email: contact@acbms.com

ACBMS Company – Nortel Facility

Corporate Business Continuity & Crisis Management Plan

• • • • • • • • • •

TO IMMEDIATELY ACTIVATE THIS CRISIS MANAGEMENT PLAN, TURN TO PAGE 8



ACBMS COMPANY CONFIDENTIAL

Business Continuity & Crisis Management Plan

PREFACE

Every business, large or small, public or private, should have a crisis management plan. Every division of every company, industrial or service business, should also have a crisis management plan. There are no exceptions, merely differences of degree.

Bear in mind that whatever your position within a company, you are not the only person affected by a crisis. In fact, if you are the CEO or are in a position to manage or influence the management of a crisis, then consider yourself fortunate. If things go badly, at least you had a shot at controlling your own destiny.

When the crisis hits, whether it is long or short-fused, you will need certain things to manage it. Planning ahead for what -- and whom -- you will need saves you valuable time in the heat of the crisis, when you would otherwise have to: a) decide what you need and b) then find it.

An effective crisis management plan presets certain key decisions on the mechanical portions of the crisis -- those aspects that rarely vary -- and leaves you free to manage the content with your hands unfettered.

Another way to look at this is as contingency planning, or conditional thinking. You have to learn to ask "what-if" questions -- and make assumptions about the questions and the answers.

Crisis Management - Planning For the Inevitable

ACBMS COMPANY CONFIDENTIAL

NOTE: This Plan is a restricted document containing information on Business Continuity strategy and the names and phone numbers of the Crisis Management Team members. Distribution is on a need-to-know basis and recipients are responsible for its security in accordance with ACBMS Company's Information Protection Policy.

Business Continuity & Crisis Management Plan

TABLE OF CONTENTS

PREFACE.....	2
INTRODUCTION.....	4
SCOPE.....	5
CRISIS CATEGORIES & VULNERABILITY ASSESSMENT.....	5
CRISIS MANAGEMENT TEAM - ACTIVATION PROCEDURE.....	8
NOTIFICATION LIST & TEAM ROSTER.....	9
CRISIS MANAGEMENT CENTER.....	11
AT&T TELECONFERENCE SERVICE INSTRUCTIONS.....	12
COMMUNICATION.....	13
PREVENTION.....	15
RESPONSE.....	17
RESUMPTION.....	20
RECOVERY.....	21
RESTORATION.....	22
PLAN EXERCISES.....	23
PLAN MAINTENANCE.....	23
APPENDICES.....	23
APPENDIX A – BUSINESS CONTINUITY PLANNING POLICY.....	24
APPENDIX B – RISK MANAGEMENT POLICY.....	25
APPENDIX C – BUSINESS IMPACT ANALYSIS POLICY.....	27
APPENDIX D – CRISIS MANAGEMENT POLICY.....	28
APPENDIX E – CRISIS COMMUNICATIONS POLICY.....	30
APPENDIX E – CRISIS COMMUNICATIONS PLAN.....	32

INTRODUCTION

Pursuant to ACBMS Company's Business Continuity Planning Policy (1.0), this plan describes the reasonable and appropriate steps required to protect ACBMS Company's business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Business Continuity planning to minimize the impact of natural or human-caused events and ensure company success is the responsibility of all ACBMS Company people.

The ultimate objective of this plan is life safety, business and property protection. Accountable to ACBMS Company's President and Chief Operating Officer, the business unit or senior site executive responsible for this plan must maintain, and exercise it such that proper consideration is given to the probability and criticality of potential business interruptions. This plan defines roles, responsibilities, methodology, and implementation requirements. The measure of its success is the efficiency of future crisis response.

POLICY: Business Continuity and Crisis Management Planning at ACBMS Company is governed by the following policy framework.

- 1.0 Business Continuity Planning Policy (Appendix A)
- 1.1 Risk Management Policy (Appendix B)
- 1.2 Business Impact Analysis Policy (Appendix C)
- 1.3 Crisis Management Policy (Appendix D)
- 1.4 Crisis Communications Policy (Appendix E)

DEFINITION: This document is designed to identify and plan a response strategy for any global, regional, or local crisis or business interruption that runs the risk of:

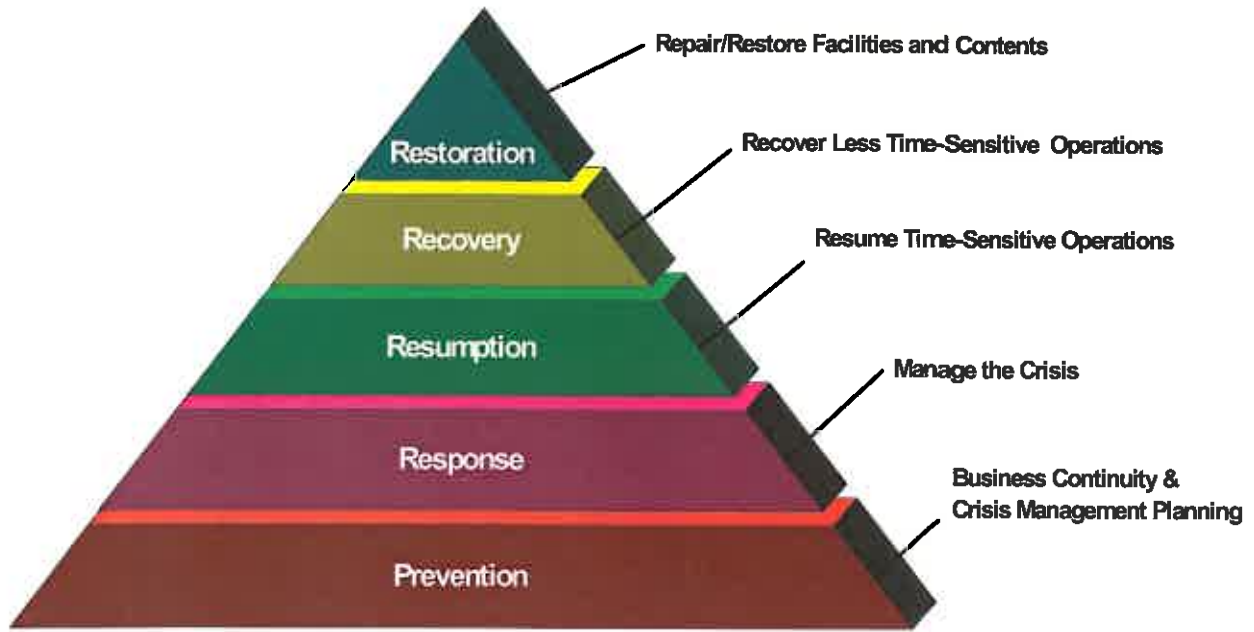
- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its officers

PHASES: Business continuity and crisis management planning is divided into five phases: **PR⁴**.

- **Prevention** - Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- **Response** - Planning and execution of initial crisis response to protect people, property, share value, and public image.

Some crisis categories (i.e., Information System or Property events) require additional phases

- **Resumption** - Planning and execution of strategies to resume time-sensitive operations following an event.
- **Recovery** - Planning and execution of strategies to recover less time-sensitive operations following an event.
- **Restoration** - Planning and execution of long-term restoration strategies leading to normal business operations.



Business Continuity & Crisis Management Phases

SCOPE

SCOPE: The scope of this ACBMS Company Business Continuity and Crisis Management Plan is:

Location Name:	Corporate Business Continuity & Crisis Management Plan
Location Mission:	Global Corporate Headquarters
Location Address:	
Location Phone:	Main Switchboard xxx xxx xxxx Security Console xxx xxx xxxx

CRISIS CATEGORIES & VULNERABILITY ASSESSMENT

CATEGORIES - ACBMS Company Business Continuity and Crisis Management policies identify five crisis categories: 1) **Business**, 2) **Information**, 3) **Information Systems**, 4) **People**, 5) **Property** (yellow shaded areas below). Each category has vulnerabilities, which include, but are not limited to, the examples provided. Any emergency or potential crisis should immediately trigger the notification of the Crisis Management Team.

For purposes of this plan, an emergency or potential crisis is any event or circumstance that is beyond the experience, ability and/or responsibility of the manager or supervisor of the business unit or site where the event is first detected or identified. It is better to notify the CMT, than hesitate and allow a minor incident to escalate into a major one.

VULNERABILITY ASSESSMENT – The matrix below further describes crisis categories and provides a simple vulnerability assessment based on event **PROBABILITY** and **CRITICALITY** using a scale of high (H), medium (M), and low (L). Recognizing that assessment is subjective, the goal is to draw attention to risks that are obviously highly probable and critical, especially if preventative measures can be taken to mitigate or reduce their impact or potential.

↓ PROBABILITY of CRISIS EVENT (Rate as High (H), Medium (M), or Low (L))		
↓ CRITICALITY of CRISIS EVENT (Rate as High (H), Medium (M), or Low (L))		
DESCRIPTION of SITE SPECIFIC CRISIS EVENT VULNERABILITY		
BUSINESS - An incident that adversely impacts ACBMS Company's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.		
L	H	▪ Loss of significant trade partner
M	H	▪ Product failure resulting in injury or death
M	M	▪ Product failing to meet requirements, negative publicity
M	M	▪ Product recall
L	M	▪ Government regulatory compliance
M	M	▪ Charges of fraud or unethical behavior by an individual
L	M	▪ Charges of fraud or unethical behavior by ACBMS Company
L	M	▪ Labor dispute, union strike, work slowdown or stoppage
L	M	▪ Plant, office or business shutdown or closure
L	M	▪ Antitrust
L	L	▪ Acts of war or terrorism
L	M	▪ Financial mismanagement
M	H	▪ Supply chain disruption
M	H	▪ Serious legal issue, i.e., litigation, criminal activity
M	M	▪ Significant negative media and/or internet coverage
L	M	▪ Offensive advertising by a competitor
M	H	▪ Regional currency or other political crisis
L	H	▪ Hostile corporate takeover, merger or other material reorganization
L	H	▪ Worker layoffs
INFORMATION - The unauthorized disclosure or compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.		
M	H	▪ Customer information compromise
M	H	▪ Personnel information compromise
M	H	▪ Financial performance information compromise
M	H	▪ Pricing information compromise
M	H	▪ Research or new product design compromise
L	H	▪ Industrial espionage
M	M	▪ Product or marketing plan information compromise
M	M	▪ Loss of trade secrets or trademark infringement
M	M	▪ Proprietary process or system information compromise
L	H	▪ Merger or acquisition plan compromise

M	H	▪ Stolen laptop with highly confidential information
↓ PROBABILITY of CRISIS EVENT (Rate as High (H), Medium (M), or Low (L))		
↓ CRITICALITY of CRISIS EVENT (Rate as High (H), Medium (M), or Low (L))		
DESCRIPTION of SITE SPECIFIC CRISIS EVENT VULNERABILITY		
INFORMATION SYSTEM - An incident or threat that affects information systems confidentiality, integrity, or availability.		
H	M	▪ Virus or other malicious code attack
M	M	▪ Denial of service attack
M	M	▪ Compromise of system confidentiality via hacker attack
M	M	▪ Password file loss
M	M	▪ Computer crime – unspecified other
L	H	▪ Compromise of consumer credit files in e-commerce.
M	H	▪ Loss of production, order processing, warehousing, logistics, accounts payable or receivable, payroll, etc.
M	H	▪ Data center power failure, fire or other incapacitation
PEOPLE - An incident that affects the safety, security or productivity of ACBMS Company people.		
L	H	▪ Death or serious injury that is work-related
H	H	▪ Workplace violence
H	H	▪ Bomb threat
L	H	▪ Executive group tragedy, i.e., plane crash
L	H	▪ Senior management death or serious injury
M	M	▪ Sexual harassment charge
M	L	▪ Substance abuse
L	H	▪ Kidnapping
L	H	▪ Ransom or extortion
M	M	▪ Random street crime, i.e., mugging, robbery, rape
L	M	▪ Sabotage
L	H	▪ Terrorism involving an employee or company facility
M	M	▪ Political unrest involving employees or families
M	M	▪ Breach of privacy
PROPERTY - A natural or human-caused event affecting the facilities or operational continuity of ACBMS Company or its suppliers, trade channels, and joint venture partners, subsidiaries and affiliates.		
H	M	▪ Natural disaster (hurricane, flood, earthquake, tornado)
H	M	▪ Severe weather (thunderstorm, heavy snow, ice storm)
M	M	▪ Fire or explosion
L	L	▪ Roof collapse
H	L	▪ Facility intrusion
M	M	▪ Human-caused industrial accident
L	M	▪ Environmental hazard – mishandling wastes
L	M	▪ Chemical spill or air pollution

L	M	▪ Ground water contamination
H	L	▪ Vehicle accident or significant cargo loss

CRISIS MANAGEMENT TEAM - ACTIVATION PROCEDURE

Initial Report - Credible information, or rumors about any situation or event that may require activation of the Corporate Crisis Management Team could be received from a variety of sources. Anyone receiving such information should immediately attempt to determine the facts, as well as the reliability and validity of the information. If the information is deemed credible and runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing significant harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its officers

then he/she should pass it to the President and COO, or alternate CMT chair for review. As time permits, the other members of the CMT should be alerted to a possible activation decision.

Activation Decision – Depending on the nature of the event, the CMT chair or alternate will make a decision whether or not to convene the CMT, either in-person or by phone. Alternately, the CMT chair may choose to delegate response to the appropriate regional or local CMT.

Communication to Convene – the CMT Chair and/or the person receiving the initial report of an ongoing or potential crisis will prepare a brief communication outlining the nature and scope of the event. To the extent possible, this information should be delivered to all CMT members in-person, by phone, or by voicemail. At minimum, the initial communication should establish:

- instructions on the information confidentiality
- details of plans to convene the CMT
- timing of the next scheduled update if authority to handle the event has been delegated

Crisis Management Meeting – A Corporate Crisis Management Center has been established in the ACBMS Board Room of the Ad Center in Anytown, USA (see page 11). Additionally, two alternate Crisis Management Centers have been identified if the primary is not available due to natural or human-caused disaster, off-site location A or the off-site location B.

If timing and circumstances make it impossible to convene the CMT in-person, alternatively a meeting may be convened using the AT&T Teleconference Service (see page 12).

NOTIFICATION LIST & TEAM ROSTER

NOTIFICATION LIST - This section provides a call list to ensure prompt notification of management, operations staff, the CMT, Emergency Teams, outside responders, vendors, etc.

CEO NOTIFICATION						
Name of Person		Chairman of the Board and Chief Executive Officer				
CMT Role		<ul style="list-style-type: none"> ▪ Ultimate Corporate Crisis Management Decision Authority ▪ Communicates with the Board of Directors 				
Work		Page		Home		Cell
Secretary:				Alternate:		
CORPORATE CRISIS MANAGEMENT TEAM ROSTER						
Name of Person		President and Chief Operating Officer				
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Business Continuity Plan owner & CMT Chair ▪ Alternate communicator to the Board of Directors 				
Work		Page		Home		Cell
Secretary:				Alternate:		
Name of Person		Vice President & Chief Financial Officer				
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Financial, Risk Mgt., Facilities & IS CMT response 				
Work		Page		Home		Cell
Secretary:				Alternate:		
Name of Person		Vice President & General Counsel				
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Chief Compliance Officer for Business Continuity Planning ▪ Direct Legal, Corporate & Corporate Affairs CMT response 				
Work		Page		Home		Cell
Secretary:				Alternate:		
Name of Person		Vice President North American Region (NAR)				
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ NAR Regional Business Continuity Planning owner & CMT Chair 				
Work		Page		Home		Cell
Secretary:				Alternate:		
Name of Person		Vice President Human Resources				
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Human Resources CMT response 				
Work		Page	None	Home		Cell
Secretary:				Alternate:		
Name of Person		Chief Technology Officer (CTO)				
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ CTO Regional Business Continuity Planning owner & CMT Chair 				
Work		Page		Home		Cell
Secretary:				Alternate:		
Name of Person		Vice President Latin American Region (LAR)				
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ LAR Regional Business Continuity Planning owner & CMT Chair 				
Work		Page		Home		Cell
Secretary:				Alternate:		

Name of Person		Vice President European Region (ER)					
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ ER Regional Business Continuity Planning owner & CMT Chair 					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President Asia Region (AR)					
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ AR Regional Business Continuity Planning owner & CMT Chair 					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President Global Communications & Community Relations					
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Communications/Community Relations CMT response 					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President & Chief Information Officer					
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Global Information Systems CMT response including global, regional, local data center disaster recovery planning 					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President & Chief Security Officer					
CMT Role		<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member, maintain plan ▪ Direct Security, Investigation, & Police liaison CMT response 					
Work		Page		Home		Cell	
Secretary:		Alternate:					

SUPPORT FUNCTION LIST

Name of Person		Vice President, Corporate Real Estate & Facilities Management					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President, Corporate Risk Management					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President, Corporate Environmental, Health & Safety					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President, Corporate Government Relations					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President, Senior Counsel Litigation					
Work		Page		Home		Cell	
Secretary:		Alternate:					
Name of Person		Vice President, Corporate Product Safety					
Work		Page		Home		Cell	
Secretary:		Alternate:					

CRISIS MANAGEMENT CENTER

CRISIS MANAGEMENT CENTER – This section identifies the primary and alternate CMC(s). The CMC should be chosen with long-term crisis management in mind considering such factors as CMT food, shelter, power, telecommunications, office equipment, and the ability to prevent media access. The CMC should be close to the workplace of executives that comprise the CMT. It is important that normal work, which also must be done during an emergency, not interfere with CMC activities and vice-versa. The CMC should not attract attention from visitors.

On-site CMC Location Name:	
On-site CMC Location Address:	
On-site CMC Location Phone:	
Primary Off-site CMC Location Name:	
Primary Off-site CMC Location Address:	
Primary Off-site CMC Location Phone:	
Alternate Off-site CMC Location Name:	
Alternate Off-site CMC Location Address:	
Alternate Off-site CMC Location Phone:	

RESOURCES - At a minimum, the CMC shall contain the following:

- Conference Table and chairs
- Readily available television sets and radios for monitoring the news media.
- Work area for secretaries, with a PCs (LAN connected, if needed), and printers.
- Copier, fax, audio-visual equipment (overhead projector, VCR, etc.).
- Table containing media releases, messages, announcements, documents, etc.
- Filing cabinet and storage for supplies, copier and printer paper, note pads, etc.
- Seating for visitors.
- Telephones should be direct lines, bypassing PBX to compensate for power failure.
- Arrangements should be made for alternative communications (i.e., digital cell phones).

AT&T TELECONFERENCE SERVICE INSTRUCTIONS

Given ACBMS Company's global scope, the reality of hectic travel schedules, and the unexpected nature of crisis situations, it is unlikely that all, or even most of the Corporate Business Continuity and Crisis Management Team members would be physically present at the world headquarters Administrative Center when an event erupts. Therefore, to facilitate the urgent communication needs of the Crisis Management Team in the early hours of an event, the AT&T Global Teleconference Service may be utilized. When the CMT needs to meet, any member or designee can organize a teleconference using the following reservation instructions.

For assistance call

Name of Person, ACBMS Company Telecommunications Specialist at 123 456 0000

Name of Person, AT&T Teleconference Service Specialist 123 456 0000

1. Decide on the date, time (including time zone), call duration and participant names and phone numbers.

2. Select call option and reservation number:

Dial - In **1 800 555 0000**

Participants dial into the conference via a pre-assigned telephone number and when prompted enter an X digit access code. Upon successful entry of the code, participants are automatically connected to the call without operator intervention. Host is responsible for providing the information to the participants.

Operator - Dialed **1 800 555 0000**

Host provides call information and AT&T Teleconference Specialist takes care of the details.

3. The AT&T Teleconference Specialist will prompt you for:

Company Name: **ACBMS Company Corporation**

Password: **XXXX**

Account Code: **Cost Center Number**

4. Select Optional Features and/or provide special requirements to Specialist.

5. The Specialist will provide you with:

Dial - In: **Dial-In Number with 2 access codes**

The Host receives a security code for call control purposes. Record the code should changes be required.

Operator - Dialed: **Conference ID Number**

6. Inform all participants of the date, time of the call and Conference ID or Dial-In number and Access Codes as well as any special instructions.

7. Teleconference Specialist Assistance during call:

Dial-In: The Host may dial # then 0 on the touch-tone phone or dial back to the Reservation Number and refer to the Access Code.

Operator Dialed: Dial the Reservation Number and refer to your Conference ID.

COMMUNICATION

COMMUNICATION - Crisis Communications, a vital part of crisis management, is a strategy to communicate timely, accurate information to all ACBMS Company stakeholders and the media during any local, regional, or global crisis. Most crises are unpredictable; however, advanced planning to communicate effectively during a crisis can positively impact media perceptions, employee reactions, investor confidence, and ultimately minimize business disruptions.

ACBMS Company's Crisis Communications Policy (1.4), stemming from its Business Continuity Policy (1.0) and Crisis Management Policy (1.3), is to take all reasonable and appropriate steps necessary to ensure designated staff effectively communicate timely, accurate information to all ACBMS Company stakeholders during an event affecting its business, reputation, people, or the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Pursuant to the Corporate Crisis Communications Plan, the Global Communications office coordinates crisis communication via Local and Regional Communications departments.

PHASES - ACBMS Company's Business Continuity and Crisis Management policies divide crisis events into five phases: Prevention, Response, Resumption, Recovery, and Restoration. Crisis Communication mainly focuses on the Prevention and Response phases since Resumption, Recovery, and Restoration relate to long-term rebuilding of assets lost in a natural or human-caused event. Crisis Communication phases include:

Assess - Assess the crisis severity and scope with the CMT to gauge communications needs, tools and timing.

Notify - Notify key constituents of the crisis in a timely fashion (within one hour depending on the level of crisis).

Inform - Communicate with key internal and external audiences, providing news and updates.

Respond - Provide timely response to inquiries from the media and other stakeholders.

Record - Track and record inquiries and outgoing information.

Collect - Gather copies of articles, interviews, media, etc., resulting from the incident/situation.

Evaluate - Evaluate crisis communication plan execution, implement process improvements.

CRISIS COMMUNICATIONS TEAM ROSTER							
Person			Role/Position				
Name of Person			Vice President Global Communications & Community Relations				
Work		Page		Home		Cell	
Secretary			Alternate				
Name of Person			Director Corporate Media Relations				
Work		Page		Home		Cell	
Secretary			Alternate				
Name of Person			Director Communications North America				
Work		Page		Home		Cell	
Secretary			Alternate				
Name of Person			Director Communications Latin America				
Work		Page		Home		Cell	
Secretary			Alternate				
Name of Person			Director Communications Europe / Asia				
Work		Page		Home		Cell	
Secretary			Alternate				

PRE-PLANNING ACTIONS for a PUBLIC IMAGE CRISIS

- Pre-establish and exercise communication methods for employees such as an emergency broadcast voicemail box to dial in for announcements, and Emergency Bulletin email.
- Develop a wallet-sized emergency contact card for CMT member and update as required.
- Pre-establish media relationships and incorporate their contact information into this plan.
- Inform media that the **primary media room is the (Name Location)** where they will always come for news. The **alternate site if the primary is unsafe is the (Name Location)**.
- Ensure the media room has adequate power, audio equipment, phones, lighting, seating, and is conducive to controlled access. Conduct a room tour and resolve issues in advance.
- Instruct Security to escort all media and outsiders arriving during a crisis to the media room. Control access to the premises and do not allow the media to wander.
- Designate one spokesperson to meet with the media and the public in order to avoid the contradictions that will creep in if there are too many voices.
- Select a spokesperson that is a subject matter expert who can convincingly articulate ACBMS Company's story. Make it clear that this is the person outsiders are to query.
- Select media savvy person who is cool, informed, unflappable and tough-minded as well as affable --- the media can sense a pushover. Provide hostile media training for that person.

CRISIS ACTIONS for a PUBLIC IMAGE CRISIS

- Open lines of communication and be accessible to anyone with useful information.
- Get on top of the situation and pinpoint the problem. Identify the salient facts, determine what is at issue, and what specific aspect of ACBMS operations or service is offensive?
- Assign accountability for monitoring all the media outlets to ensure you keep abreast of the latest developments or spin. Determine why the issue has jumped into prominence?
- Reconstruct events into some coherent pattern and track down what led up to problem.
- Find out who is involved and why.
- Identify the "influentials" and learn their motivations.
- Consider a quick and dirty phone sampling to assess intensity of feeling by those affected.
- Bring in a trusted outsider for perspective, insiders cannot see themselves as others do.
- Engage a professional public relations firm, a resource whose judgement is respected.
- Construct a "best case." Give background and tell ACBMS Company's "story", a reconstruction of the facts and an interpretation from the company's viewpoint. Protect ACBMS's credibility.
- Reveal important but often overlooked prior events that help explain the current conditions.
- Be honest, factual, concerned, and willing to accept blame rightfully attached to ACBMS.
- Consult legal counsel to identify danger points, and understand litigation exposure.
- Develop a sense of what can be said and done and what words or acts should be avoided.
- Do not over react to legal concerns. Over zealous protection of legal positions may cost ACBMS Company the public image battle! This stance produces the corporate stonewall, which makes even a sincere, concerned management look ignorant, indifferent, and guilty.
- Communicate regularly with stakeholders and employees and tell them what is known. Encourage them to call if they are worried or have useful information.
- Develop rapport with the journalists and stay closer to those who report the story fairly.
- Designate times for update briefings in the media room and keep telling ACBMS's story.
- Encourage the press to bring information for comment, but don't be bullied.
- Control press conferences and interviews. Remember, if ACBMS Company has information to dispense, the media wants it. Be consistent, and don't accept or comment on speculation.
- If important information is lacking, say so, but add that an investigation is underway.
- If unfavorable developments force the story to be modified, do so and explain why. No one blames a company that appears to be keeping an open mind and is responding to new data.

- Resolve the image crisis quickly. Letting too much time elapse between the start of the problem and its resolution will damage ACBMS Company's reputation, even if it is not at fault.

PREVENTION

PREVENTION STRATEGY - This section describes general actions and pre-incident measures that should be taken to manage risk or lessen incident impact.

- Obtain senior leader sponsorship of Business Continuity and Crisis Management Planning.
- Foster prudent Business Continuity and Crisis Planning via the employee appraisal process.
- Overcome the tendency to procrastinate planning for a Crisis, make it a business priority.
- Ensure business processes and resource allocation decisions identify and manage risk.
- Conduct a Business Impact Analysis to quantify and qualify organizational exposures.
- Educate decision makers on BIA results and accelerate high-risk reduction initiatives.
- Prioritize business risk reduction strategies consistent with capital and expense budgets.
- Institutionalize Business Continuity and Crisis Management by assigning accountability.
- Define department level roles, responsibilities, and accountabilities in plan development.
- Establish deadlines for development, review, and approval of Crisis Management Plans.
- Train Crisis Management Team members and other affected parties on CMT protocol.
- Exercise and maintain plans and review for currency on at least an annual cycle.
- Evaluate Crisis Management Team performance after each crisis event.
- Continuously improve the Crisis Management planning process.

CATEGORY SPECIFIC PREVENTION STRATEGY - This section describes proactive plans and pre-incident measures that should be taken to manage risk or lessen incident impact associated with the specific vulnerabilities identified in each crisis category.

Business Crisis Prevention - ACBMS Company's competitive position, its reputation, brand names, workforce morale and productivity are maintained by executive-sponsored organizational commitment to the company Vision, Values, and Business Strategy. It is the responsibility of all ACBMS Company people to prevent, detect, and report any incident that adversely impacts the company's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.

Actions:

- **Protect** – the hard-earned industry leadership position by ethical business practices and compliance with the Business Conduct and Conflict of Interest Policies. Continuously improve relations with employees, trade partners, suppliers to ensure business continuity.
- **Train** - all ACBMS Company people on the company's Vision, Values, Business Strategy, to ensure company success.
- **Report** – immediately to the CMT, any potential crisis that is beyond the experience, ability and/or responsibility of the manager where the event is identified. Early detection and quick response can reduce the potential for a minor issue becoming a major crisis.

Information Crisis Prevention – Information Security is the responsibility of all ACBMS Company people. Employee compliance with the ACBMS Company Information Protection Policy is the most effective deterrent to an information crisis. Should there be an unauthorized disclosure, compromise or suspected compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual, it should be reported to Corporate Security immediately.

Actions:

- **Protect** - all ACBMS Company and third party data pursuant to Information Protection Policy.
- **Train** - employees and enforce policies to prevent information compromise.
- **Report** - the compromise of ACBMS COMPANY CONFIDENTIAL information to Security.

Information Systems Crisis Prevention – prudent use of Information Systems and IS Security is the responsibility of all ACBMS Company people. Compliance with the ACBMS Company Information Systems and IS Security Policies is the most effective deterrent to an Information Systems Security crisis. Global Information Systems and the Information Security Group should be promptly informed of any incident or threat that affects system:

Confidentiality - protection against unauthorized information systems access, intentional or accidental, which could compromise ACBMS COMPANY INTERNAL or CONFIDENTIAL information, **Integrity** - protection against accidental or intentional damage, modification, destruction of information systems and networks, or **Availability** - protection to ensure information systems work promptly and service is not denied to authorized users.

Actions:

- **Protect** - all information systems pursuant to the Information Systems and IS Security Policies and the Information Systems Security Architecture.
- **Train** - prevent systems compromise by employee training and policy enforcement. Observe prudent workstation protocol, i.e., protect passwords, secure laptops, and backup files, etc.
- **Report** - threats to Work Station Support or Information Security.

People Crisis Prevention – Personnel Security is the responsibility of all ACBMS people. Common sense and personal attention to issues or threats that may affect the safety, security or productivity of ACBMS Company people is the most effective deterrent to a People crisis.

Actions:

- **Protect** - all ACBMS Company people and prevent security threats by enforcing Human Resources, Safety, and Security policies, including, but not limited to sexual harassment, workplace violence, substance abuse, safety, smoking, parking, badge and identification, visitor escort, facility positive access control, etc.
- **Train** - employees and contractors on policies governing facility positive access control, visitor escort, parking, badge and identification, and other safety and security rules. Observe prudent personal security practices like travel security, and protection of valuables.
- **Report** - events or threats needing manager, Human Resources, Security, or Legal action.

Property Crisis Prevention - Any natural or human-caused event affecting the facilities or operations of ACBMS Company or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

Actions:

- **Protect** - ACBMS Company from property damage threats by enforcing security, environmental, health and safety rules and regulations designed to prevent, detect, and respond to natural and human-caused events such as fire, flood, chemical spill, etc. Fund and maintain systems like fire alarms, sprinklers, intrusion detectors, closed-circuit television, and public address systems, which are designed to detect and suppress violent or catastrophic events.
- **Train** - employees and contractors on policies governing facility positive access control, visitor escort, parking, badge and identification, and other safety and security rules.
- **Report** - events or threats needing manager, Human Resources, Security, or Legal action.

RESPONSE

RESPONSE STRATEGY - This section describes plans and strategies for initial crisis response to protect people, property, share value, public image and manage the early stages of a crisis.

Business Crisis Response – for any incident that adversely impacts ACBMS’s competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.

Actions:

- **Detect** - identify the crisis or potential crisis event. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. For a brewing or potential business crisis such as litigation, monitor events and provide early warning to the CMT and appropriate stakeholders.
- **Notify** – alert the CMT immediately, of any crisis that is beyond the experience, ability and/or responsibility of the manager where the event is identified. Remember, early detection and quick response can reduce the potential for a minor issue becoming a major crisis.
- **Assemble** – brief the CMT and subject matter experts on the business crisis.
- **Assess** - conduct a damage assessment, assign accountability, and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- **Plan** – guided by ACBMS Company’s commitment to the company Vision, Values, and Business Strategy, develop a plan to protect the company’s competitive position, reputation, brand names, workforce morale and productivity.
- **Act** - execute the plan and protect the company’s hard-earned industry leadership position. Improve business continuity with corrective actions that minimize future event potential. Move to resumption, recovery and restoration phases as needed.
- **Update** - the CMT and all stakeholders in accordance with the Crisis Communication Plan.

Information Crisis Response – for any unauthorized disclosure or compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company’s competitive position, tarnish its reputation, or embarrass an individual.

Actions:

- **Detect** - identify the information disclosed or compromised. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional compromise potential immediately.
- **Notify** – alert the CMT immediately, of any disclosure or compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company’s competitive position, tarnish its reputation, or embarrass an individual.
- **Assemble** – brief the CMT and subject matter experts on the information crisis.
- **Assess** - conduct a damage assessment, assign investigation accountability, and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- **Plan** – utilizing the processes and cross-functional skills of the Corporate Security Team, rapidly develop an investigative plan to determine how, what, where, when, and why ACBMS COMPANY CONFIDENTIAL information was compromised.
- **Act** - assign responsibility and execute the investigative plan. For cases involving employee misconduct, pursue disciplinary action pursuant to Human Resources Policy. For cases involving crime perpetrated by external threats, pursue criminal prosecution coordinated by

the Business Ethics Team. Minimize future compromise potential and move to resumption, recovery and restoration phases as needed.

- **Update** - the CMT and all stakeholders in accordance with the Crisis Communication Plan.

Information Systems Crisis Response – for any incident or threat that affects information systems confidentially, integrity, or availability.

Actions:

- **Detect** - identify the information system crisis. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional crisis impact potential immediately.
- **Notify** – alert the CMT immediately, of any incident or threat that affects information systems confidentiality, integrity, or availability.
- **Assemble** – brief the CMT and subject matter experts on the information systems crisis.
- **Assess** - conduct a damage assessment, assign accountability, and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- **Plan** – utilizing the cross-functional skills of the Global Information Systems, Problem Management Process, the Information Security and Corporate Security groups, and as necessary, the Business Ethics Team, rapidly develop a plan to determine how, what, where, when, and why information systems confidentiality, integrity, or availability was compromised.
- **Act** – immediately deploy the Problem Management Process and as necessary the Data Center Disaster Recovery Plan developed and maintained by Global Information Systems. Conduct an investigation to determine the root cause for the compromise. For cases involving employee misconduct, pursue disciplinary action pursuant to Human Resources Policy. For cases involving computer crime perpetrated by external threats, pursue criminal prosecution coordinated by the Business Ethics Team. Minimize future compromise potential and move to resumption, recovery and restoration phases as needed.
- **Update** - the CMT and all stakeholders in accordance with the Crisis Communication Plan.

People Crisis Response – for any incident that affects the safety, security or productivity of ACBMS people. Many people crisis events also involve a property crisis, i.e., a fire or tornado.

Actions:

- **Detect** - identify the people crisis. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional impact potential immediately and focus on life safety using Protective Services, Corporate Security, Human Resources, specialized consultants, law enforcement, emergency medical, fire and other municipal or contract agencies as appropriate.
- **Notify** – alert the CMT immediately, of any incident that affects the safety, security or productivity of ACBMS Company people.
- **Assemble** – brief the CMT and subject matter experts on the people crisis.
- **Assess** - conduct a damage assessment and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- **Plan** – utilizing the cross-functional skills of Human Resources, Corporate Security, rapidly develop a plan to determine how, what, where, when, and why the people crisis happened and what can be done to minimize or limit the impact.
- **Act** - assign responsibility and execute the plan. For cases involving employee misconduct, pursue disciplinary action pursuant to Human Resources Policy. For cases involving crime perpetrated by external threats, pursue criminal prosecution coordinated by the Business

Ethics Team. Minimize future incident potential and move to resumption, recovery and restoration phases as needed.

- **Update** - the CMT and all stakeholders in accordance with the Crisis Communication Plan.

Property Crisis Response – for any natural or human-caused event affecting the facilities or operations of ACBMS Company or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

Actions:

- **Detect** - identify the property crisis. Verify the facts and gather background data. Open lines of communication and be accessible to anyone with useful information. Limit additional impact potential immediately. Focus first on life safety and second on property protection.
- **Notify** – alert the CMT immediately, of any natural or human-caused event affecting the facilities or operations of ACBMS Company or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.
- **Assemble** – brief the CMT and subject matter experts on the property crisis.
- **Assess** - conduct a damage assessment, assign responsibilities, and define a response strategy. Determine timelines, priorities, resources required, and kickoff planning.
- **Plan** – utilizing the cross-functional skills of Corporate Real Estate, Corporate Security, develop an property recovery plan. Determine how, what, where, when, and why the property crisis happened.
- **Act** - assign responsibility and execute the plan. Minimize future compromise potential and move to resumption, recovery and restoration phases as needed.
- **Update** - the CMT and all stakeholders in accordance with the Crisis Communication Plan.

Use the following table to prioritize response tasks.

Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.

	3.
Course of Action (Insert Actions)	1.
	2.
	3.

RESUMPTION

RESUMPTION STRATEGY - This section is designed to get the CMT to focus on and describe, plans and strategies to resume time-sensitive operations following a crisis. It requires the CMT to identify and prioritize worst case loss crisis events, and to describe impact on business operations. Primary resumption goals and initial course of action are then detailed. In a crisis, if the event does not occur, the CMT moves to the next resumption phase priority issue.

Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.

RECOVERY

RECOVERY STRATEGY - This section is designed to get the CMT to focus on and describe, plans and strategies to resume less time-sensitive operations following a crisis. It requires the CMT to identify and prioritize less critical crisis events, and to describe the impact on business operations. Primary recovery goals and initial course of action are then detailed. In a crisis, if the event does not occur, the CMT moves to the next recovery phase priority issue.

Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.

RESTORATION

RESTORATION STRATEGY - This section is designed to get the CMT to focus on and describe, plans and long-term restoration strategies leading to normal business operations. It describes, for example, a strategy to repair the primary facility or construct a new facility.

Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.
Impact on Business (Insert Description)	
Response Task (Insert Task)	
Primary Goals (Insert Goals)	1.
	2.
	3.
Course of Action (Insert Actions)	1.
	2.
	3.

PLAN EXERCISES

PLAN EXERCISES - Proof and confidence that this plan will work results from completion of a successful exercise of its strategies. Plan exercises, such as a tabletop or tactical exercise described below, determine CMT readiness, and whether plans are adequate, and up-to-date.

Tabletop Exercise - a crisis scenario is established and the CMT will "walkthrough" their action items in a role-play involving the CMT leaders and alternates. The scenario is made available in advance to allow team members to review their actions in response to the scenario. The Plan is checked for any errors or omissions and any necessary changes are implemented.

Tactical Exercise - is a simulated crisis, conducted in a "war game" format. All members of the CMT are required to participate and perform their tasks under announced or surprise conditions, and with information that is made available by the exercise monitor, simulating an actual crisis. Generally, a scenario is provided to all CMT members located in a large conference room or utilizing videoconferencing if it involves multiple sites. A "speeded up" clock is employed, in order to complete 3 days' worth of actions in one working day. The Plan is checked for any errors or omissions and any necessary changes are implemented.

Exercise Scenarios - are developed to achieve outcomes and objectives established by management. Some of the considerations in the development of exercise scenarios are:

- Re-exercising plan segments that were determined to be deficient in past exercises.
- Exercising plans on crisis scenarios never tested previously.
- Involving CMT members who are new or need more training and preparation.
- Ensuring the exercises specify the extent of various damages or conditions, such as the files, documents, personnel, etc. that are available or not available to support the CMT.

Education and Training - Awareness of the need for maintaining, a viable crisis management capability is essential. This is achieved through education and training sessions conducted on a regular basis. The objectives of training are to:

- Train the employees who help maintain the Plan in a constant state of readiness.
- Train the employees who execute various plan segments.
- Heighten awareness for those employees not directly involved in executing the plan.

PLAN MAINTENANCE

PLAN MAINTENANCE – requires the appointment of a CMT Coordinator accountable for plan updates. Maintenance is either scheduled or unscheduled. Scheduled maintenance is time-driven; unscheduled maintenance is event-driven. Scheduled maintenance consists of quarterly reviews and updates as well as annual structured walkthrough and/or tactical exercises. Unscheduled maintenance is unpredictable and cannot be scheduled such as when there is an acquisition or merger, transfers, promotions, personal relocation (i.e., home telephone number change), or resignations of individuals on the Emergency Notification List or CMT roster.

APPENDICES

APPENDICES – Provided as appendices are policies, call trees, site maps, or other plans addressing a specific crisis topic as required.

APPENDIX A – BUSINESS CONTINUITY PLANNING POLICY

POLICY OWNER: Legal Function - Corporate Security	EFFECTIVE: AUGUST 2003	REF: 1.0 SUPERSEDES: New	PAGE: 1 of 1
SUBJECT: BUSINESS CONTINUITY PLANNING POLICY		APPLIES TO: All Operations Globally	

1.0 INTRODUCTION Business Continuity Planning is a vital process directed towards maintaining company profitability and protecting the interests of its stakeholders. It embraces the identification and evaluation of risk events, the minimization of their probability and impact, and response planning for rapid business restoration should the unexpected happen.

2.0 POLICY ACBMS Company's Business Continuity Policy is to take all reasonable and appropriate steps necessary to protect its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Business Continuity planning to minimize the impact of natural or human-caused events and ensure company success is the responsibility of all ACBMS Company people.

3.0 PURPOSE & SCOPE The purpose of this policy is to formalize Business Continuity planning and provide guidelines for plan development, maintenance and testing. Accountable to the President, all business units must develop, maintain and exercise Business Continuity plans that account for the probability and criticality of potential business interruptions.

4.0 DEFINITION Business Continuity planning is designed to identify and plan a risk minimization strategy for any global, regional, or local crisis or business interruption that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its officers

5.0 CATEGORIES Business interruptions or crisis situations generally fall into one of the following categories:

- **Business** - An incident that adversely impacts ACBMS Company's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.
- **Information** - the unauthorized disclosure or compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.
- **Information System** - An incident or threat that affects information systems confidentiality, integrity, or availability.
- **People** - An incident that affects the safety, security or productivity of ACBMS Company people.
- **Property** - A natural or human-caused event affecting the facilities or operational continuity of ACBMS Company or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

6.0 BUSINESS CONTINUITY PHASES ACBMS Company's Business Continuity Plan guide divides business continuity management into five phases = PR⁴.

- **Prevention** - Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- **Response** - Planning and execution of initial crisis response to protect people, property, share value, and public image.
- **Resumption** - Planning and execution of strategies to resume time-sensitive operations following an event.
- **Recovery** - Planning and execution of strategies to recover less time-sensitive operations following an event.
- **Restoration** - Planning and execution of long-term restoration strategies leading to normal business operations.

7.0 PROCESS A Business Continuity Plan model is part of ACBMS Company's Business Continuity Plan Guide. The Business Continuity planning process generally includes, but may not be limited to:

- **Managing Risk** (Policy 1.1) - management of risk includes a variety of proactive steps to mitigate, transfer, or finance risk to an acceptable level. Examples are: insurance, fire protection, security measures, health and safety measures.
- **Business Impact Analysis** (Policy 1.2) - a BIA is designed to qualify and quantify exposures to an organization and identify the financial and operational impacts that may result from a disruption of business. It may be applied whenever it is critical that a cost-benefit analysis supports an investment decision. ACBMS Company Corporate Risk Management, in conjunction with external Risk Brokers and Insurers, conduct a BIA for production facilities on a periodic basis.
- **Crisis Management** (Policy 1.3) - is a strategy to react immediately to unexpected events that threaten ACBMS Company's business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes.
- **Crisis Communication** (Policy 1.4) - is a strategy to communicate timely, accurate information to all ACBMS Company stakeholders and the media. All Crisis Communication is coordinated through the Global Communications function that has developed an enterprise-wide Crisis Communication Plan.

APPENDIX B – RISK MANAGEMENT POLICY

POLICY OWNER: Finance - Risk Management
 SUBJECT: **RISK MANAGEMENT POLICY**

EFFECTIVE: AUGUST 20003 REF: 1.1 SUPERSEDES: New PAGE: 1 of 2

APPLIES TO: All Operations Globally

1.0 INTRODUCTION Managing business risks is a key element of the business continuity planning process directed towards maintaining company profitability and protecting the interests of its stakeholders. It embraces the identification and evaluation of risks and vulnerabilities, the minimization of their probability and impact, and contingency planning for rapid business restoration should the unexpected happen.

2.0 POLICY Stemming from its Business Continuity Policy (1.0), ACBMS Company's Risk Management Policy (1.1), is to take all reasonable and appropriate steps necessary to protect its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Managing risks to minimize the impact of natural or human-caused events and ensure company success is the responsibility of all ACBMS Company people.

3.0 PURPOSE & SCOPE The purpose of this policy is to formalize Risk Management as part of Business Continuity Planning and to provide implementation guidelines. Accountable to the President and COO, all business units must develop and execute plans that account for the probability and criticality of potential business risks and interruptions.

4.0 DEFINITION Risk Management includes a variety of proactive steps to mitigate, transfer, or finance risk to an acceptable level. It is part of a comprehensive business continuity strategy designed to reduce the potential for any global, regional, or local crisis or business interruption that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close unsolicited media, government, or regulatory authority scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its employees or officers

ACBMS Company's Business Continuity Planning and Crisis Management policies highlight five crisis categories. These areas of risk, along with the associated vulnerabilities are highlighted in 7.0 below.

5.0 BUSINESS CONTINUITY PHASE ACBMS's Business Continuity policy divides crisis events into five phases = PR⁴.

- **Prevention** - Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- **Response** - Planning and execution of initial crisis response to protect people, property, share value, and public image.
- **Resumption** - Planning and execution of strategies to resume time-sensitive operations following an event.
- **Recovery** - Planning and execution of strategies to recover less time-sensitive operations following an event.
- **Restoration** - Planning and execution of long-term restoration strategies leading to normal business operations.

Risk Management primarily focuses on Prevention since Response, Resumption, Recovery, and Restoration relate to immediate and long-term strategies once a natural or human-caused event happens.

6.0 PROCESS Responsibility for risk management resides with business unit executives and site operational managers. Comprehensive risk management requires long-range strategy and tactical execution of programs designed to identify, understand, and implement the most cost-efficient and effective alternative to mitigate, transfer or finance business risk. Viewed as a process, risk management is cyclical and generally includes, but may not be limited to:

- **Business Impact Analysis (Policy 1.2)** - a BIA is designed to qualify and quantify exposures and identify the financial and operational impacts that may result from a business interruption. Corporate Risk Management, in conjunction with external Risk Brokers and Insurers, facilitate a periodic BIA for production facilities, or when operational managers need a BIA to support risk reduction investment decisions.
- **Risk Reduction** – includes various site-specific and locally managed steps, designed to mitigate, transfer, or finance risk to an acceptable level. Examples include, but are not limited to, insurance, fire protection, security safeguards, training programs, or health and safety measures.
- **Audit** – an audit compliments a BIA by measuring the effectiveness of efforts to mitigate risk through plans, programs, or capital improvements. Corporate Risk Management, in conjunction with external Risk Brokers and Insurers, audit ACBMS Company facilities periodically. Local managers use audit findings to establish priorities consistent with risk probability, criticality and available resources.
- **Oversight** – conducted at the Corporate, Regional, or Local level, oversight includes the monitoring of risk mitigation strategies. Risk reduction efficiency and cost-effectiveness are enhanced by global leveraging, standardization of risk management strategies, and continuous process improvement.

POLICY OWNER: Finance - Risk Management

EFFECTIVE: AUGUST 2003 REF: 1.1 SUPERSEDES: New

PAGE: 2 of 2

SUBJECT: **RISK MANAGEMENT POLICY**

APPLIES TO: All Operations Globally

7.0 CATEGORIES and VULNERABILITIES ACBMS Company's Business Continuity and Crisis Management policies identify five crisis categories (shaded areas) or areas of risk. Each category has vulnerabilities, which include, but are not limited to, the examples:

Business - An incident that adversely impacts ACBMS Company's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.	
<ul style="list-style-type: none"> ▪ Loss of significant trade partner ▪ Product failure resulting in injury or death ▪ Product failing to meet requirements, negative publicity ▪ Product recall ▪ Government regulatory compliance ▪ Charges of fraud or unethical behavior by an individual ▪ Charges of fraud or unethical behavior by ACBMS Company ▪ Labor dispute, union strike, work slowdown or stoppage ▪ Plant, office or business shutdown or closure ▪ Antitrust 	<ul style="list-style-type: none"> ▪ Acts of war or terrorism ▪ Financial mismanagement ▪ Supply chain disruption ▪ Serious legal issue, i.e., litigation, criminal activity ▪ Significant negative media and/or internet coverage ▪ Offensive advertising ▪ Regional currency or other political crisis ▪ Hostile corporate takeover, merger or other major reorganization ▪ Worker layoff
Information - The unauthorized disclosure or compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.	
<ul style="list-style-type: none"> ▪ Customer information compromise ▪ Personnel information compromise ▪ Financial performance information compromise ▪ Pricing information compromise ▪ Research or new product design compromise ▪ Industrial espionage 	<ul style="list-style-type: none"> ▪ Product or marketing plan information compromise ▪ Loss of trade secrets or trademark infringement ▪ Proprietary process or system information compromise ▪ Merger or acquisition plan compromise ▪ Stolen laptop with highly confidential information
Information System - An incident or threat that affects information systems confidentiality, integrity, or availability.	
<ul style="list-style-type: none"> ▪ Virus or other malicious code attack ▪ Denial of service attack ▪ Compromise of system confidentiality via hacker attack ▪ Password file loss ▪ Computer crime – unspecified other 	<ul style="list-style-type: none"> ▪ Compromise of consumer credit files in e-commerce. ▪ Loss of production, order processing, warehousing, logistics, accounts payable or receivable, payroll, etc. ▪ Data center power failure, fire or other incapacitation
People - An incident that affects the safety, security or productivity of ACBMS Company people.	
<ul style="list-style-type: none"> ▪ Death or serious injury that is work-related ▪ Workplace violence ▪ Bomb threat ▪ Executive group tragedy, i.e., plane crash ▪ Senior management death or serious injury ▪ Sexual harassment charge ▪ Substance abuse 	<ul style="list-style-type: none"> ▪ Kidnapping ▪ Ransom or extortion ▪ Random street crime, i.e., mugging, robbery, rape ▪ Sabotage ▪ Terrorism involving an employee or company facility ▪ Political unrest involving employees or families ▪ Breach of privacy
Property - A natural or human-caused event affecting the facilities or operational continuity of ACBMS Company or its suppliers, trade channels, and joint venture partners, subsidiaries and affiliates.	
<ul style="list-style-type: none"> ▪ Natural disaster (hurricane, flood, earthquake, tornado) ▪ Severe weather (thunderstorm, heavy snow, ice storm) ▪ Fire or explosion ▪ Roof collapse ▪ Facility intrusion 	<ul style="list-style-type: none"> ▪ Human-caused industrial accident ▪ Environmental hazard - mishandling wastes ▪ Chemical spill or air pollution ▪ Ground water contamination ▪ Vehicle accident or significant cargo loss

APPENDIX C – BUSINESS IMPACT ANALYSIS POLICY

POLICY OWNER: Finance - Risk Management	EFFECTIVE: AUGUST 2003 REF: 1.2 SUPERSEDES: N&W	PAGE: 1 of 1
SUBJECT: BUSINESS IMPACT ANALYSIS POLICY	APPLIES TO: All Operations Globally	

1.0 POLICY Stemming from its Business Continuity Policy (1.0), ACBMS Company's Business Impact Analysis Policy (BIA) is to periodically conduct a BIA to qualify and quantify risk exposures and to identify the financial and operational impacts that may result from a disruption of business. A BIA is part of ACBMS Company's strategy to take all reasonable and appropriate steps necessary to protect its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes.

2.0 PURPOSE & SCOPE The purpose of this policy is to formalize Business Impact Analysis as part of Business Continuity Planning and to provide implementation guidelines. Accountable to the President and COO, all business units are responsible for conducting a BIA coordinated by Corporate Risk Management in conjunction with external Risk Brokers and Insurers.

3.0 DEFINITION Business Impact Analysis is the first step in comprehensive Business Continuity Planning. It provides a financial overview of risk exposure, facilitates prioritization of risk mitigation efforts, and enhances overall understanding of the potential impact of any global, regional, or local crisis that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close unsolicited media, government, or regulatory authority scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands, and its employees or officers

4.0 BUSINESS CONTINUITY PHASES ACBMS's Business Continuity policy divides crisis events into five phases = **PR⁴**.

- **Prevention** - Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- **Response** - Planning and execution of initial crisis response to protect people, property, share value, and public image.
- **Resumption** - Planning and execution of strategies to resume time-sensitive operations following an event.
- **Recovery** - Planning and execution of strategies to recover less time-sensitive operations following an event.
- **Restoration** - Planning and execution of long-term restoration strategies leading to normal business operations.

Business Impact Analysis primarily focuses on the Prevention phase; however, it helps prioritize the steps to be taken in Response, Resumption, Recovery, and Restoration strategies.

5.0 PROCESS The responsibility for conducting business impact analysis to qualify and quantify exposures and identify the financial and operational impacts that may result from a business interruption resides with business unit executives and site operational managers. Corporate Risk Management, in conjunction with external Risk Brokers and Insurers, facilitate a BIA for production facilities on a periodic basis. However, a BIA may also be applied when cost-benefit analysis is required to support local risk reduction investment decision. The BIA process includes, but may not be limited to:

- **Survey Tool** - development of a survey instrument that captures useful information on key business drivers affecting operational excellence, their inherent risks and vulnerabilities, and the financial impact of any potential disruption.
- **Pilot Study** - confirmation of the reliability and validity of the survey tool in a small-scale test, along with improvement of the instrument as necessary.
- **Survey Research** - data gathering over the desired BIA scope using the validated survey instrument.
- **Compilation** – processing raw survey data into a financial model that graphically illustrates risk exposures in a fashion that facilitates the establishment of mitigation priorities.
- **Validation** - clarification or verification of survey results that appear incomplete, inaccurate, or confusing.
- **Analysis** - review of survey results and development of clear picture of the relative importance of individual exposures.
- **Prioritization** - establishment of risk reduction priorities based upon criteria defined by senior leadership and consistent with business unit strategic plans.
- **Reporting** - presenting the results to management in a format that facilitates informed resource allocation decisions based on a clear understanding of operational imperatives and resource constraints.
- **Revision** – recalibration of the BIA results upon receipt of management feedback.
- **Dissemination** - circulation of final BIA results to business unit personnel responsible for business continuity planning, crisis management, and risk mitigation.

APPENDIX D – CRISIS MANAGEMENT POLICY

POLICY OWNER: Legal Function - Corporate Security	EFFECTIVE: AUGUST 2003 REF: CSP - 1.3 SUPERSEDES: New PAGE: 1 of 2
SUBJECT: CRISIS MANAGEMENT POLICY	APPLIES TO: All Operations Globally

1.0 INTRODUCTION An unexpected event which is mishandled, or which the public perceives to be mishandled, can quickly turn into a crisis threatening the well being of the company. The key elements in reacting effectively to an unforeseen event are speed, good judgement, and good communication. While every potential crisis may be different, many of the procedures for reacting to them are common. Therefore it is prudent to identify and practice those procedures to save time and concentrate resources to minimize the effects of a potential crisis.

2.0 POLICY Stemming from its Business Continuity Policy (1.0), ACBMS Company's Crisis Management Policy (1.3) is to take all reasonable and appropriate steps to react immediately to unexpected events that threaten its business, reputation, people, and the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Crisis Management planning to minimize the impact of natural or human-caused events and ensure company success is the responsibility of personnel specifically assigned to business unit Crisis Management teams.

3.0 PURPOSE & SCOPE The purpose of this policy is to formalize Crisis Management planning and provide guidelines for plan development, maintenance and testing. Corporate and regional headquarters, and important sites such as factories, warehouses, and data or financial centers must maintain Crisis Management plans as a part of their Business Continuity program. Plan detail should be commensurate with the probability and criticality of each crisis event type.

4.0 DEFINITION A crisis at ACBMS Company is a global, regional, or local incident or situation that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value or the company's financial position
- causing harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company and its officers

5.0 CATEGORIES Crisis situations generally fall into one of the following categories:

- **Business** - An incident that adversely impacts ACBMS Company's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.
- **Information** - the unauthorized disclosure or compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.
- **Information System** - An incident or threat that affects information systems confidentiality, integrity, or availability.
- **People** - An incident that affects the safety, security or productivity of ACBMS Company people.
- **Property** - A natural or human-caused event affecting the facilities or operational continuity of ACBMS Company or its suppliers, trade, channel, and joint venture partners, subsidiaries and affiliates.

6.0 PHASES ACBMS's Business Continuity Plan guide divides crisis management into five cyclical phases = **PR⁴**.

- **Prevention** - Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- **Response** - Planning and execution of initial crisis response to protect people, property, share value, and public image.
- **Resumption** - Planning and execution of strategies to resume time-sensitive operations following a disaster.
- **Recovery** - Planning and execution of strategies to recover less time-sensitive operations following a disaster.
- **Restoration** - Planning and execution of long-term restoration strategies leading to normal business operations.

7.0 PLAN A Crisis Management Plan model is part of ACBMS Company's Business Continuity Plan Guide. Business unit Crisis Management plans should address, but not be limited to:

- **Scope** - a definition of the Crisis Management Plan scope, i.e., local, regional, corporate.
- **Possible Crisis** - a site-specific list of crisis events if different from the contents of the corporate model.
- **Team Roster** - a list of primary Crisis Management Team (CMT) and sub-team members and alternates.
- **Notification Lists** - a call tree for the CMT, management, Plant Emergency Organizations, outside responders, etc.
- **Crisis Management Center** - identification of a CMC location and alternate site(s).
- **Resources** - a list of CMT and CMC equipment, where it is located, and who is accountable for its maintenance.
- **Communication** - a point of contact and strategy to communicate timely, accurate information to all stakeholders.
- **Prevention** - Proactive plans and description of pre-incident measures to manage risk or lessen incident impact.*
- **Response** - Plans and strategies for initial crisis response to protect people, property, share value, public image.
- **Resumption** - *Plans and strategies to resume time-sensitive operations following a disaster. ***
- **Recovery** - *Plans and strategies to recover less time-sensitive operations following a disaster. ***
- **Restoration** - *Plans and long-term restoration strategies leading to normal business operations. ***
- **Plan Exercises** - a definition of annual plan test protocol or table top exercise and corrective action measures.

- **Plan Maintenance** - appointment of a Business Continuity Coordinator accountable for plan updates.
- **Appendices** - Site maps, drawings, call lists, or other plans addressing a specific crisis topic as required.

POLICY OWNER: Legal Function - Corporate Security EFFECTIVE: AUGUST 2003 REF: 1.3 SUPERSEDES: NEW PAGE: 2 of 2
 SUBJECT: **CRISIS MANAGEMENT POLICY** APPLIES TO: All Operations Globally

*Note These plans should be developed in accordance with 6.1, (Business Risk Mitigation)

**Note In certain scenarios, for example a fire in a high-value business location, it will be both possible and effective to develop these plans. In other scenarios it is sufficient to recognize the distinguishing features of each phase.

8.0 CRISIS MANAGEMENT TEAM ROLES

CORPORATE CRISIS MANAGEMENT TEAM	
Person or Position	Role and Responsibility
Chairman & Chief Executive Officer	<ul style="list-style-type: none"> ▪ Ultimate Corporate Crisis Management Decision Making Authority
President & Chief Operating Officer	<ul style="list-style-type: none"> ▪ Corporate Business Continuity Planning sponsor & Chair of Corporate CMT
Business Unit VPs	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Regional Business Continuity Planning sponsor & CMT Chair
Chief Technology Officer	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Corporate Technology & Procurement CMT response
Chief Financial Officer	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Corporate Business Impact Analysis sponsor via Risk Management ▪ Direct Financial, Risk Management, Corporate Facilities & GIS CMT response
VP & General Counsel	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Chief Compliance Officer for Business Continuity Planning ▪ Direct Global Communications, Community Relations, Government Affairs, Legal, Corporate Security, & Environmental CMT response
VP Human Resources	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Human Resources CMT response
VP & CIO	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Global Information Systems CMT response
VP Global Communications & Community Relations	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Corp./Regional Communications/Community Relations CMT response
VP Corporate Security	<ul style="list-style-type: none"> ▪ Corporate Crisis Management Team Member ▪ Direct Security, Investigations, & Law Enforcement liaison CMT response
Specialist support as required	<ul style="list-style-type: none"> ▪ Risk Management, Government Relations, Safety & Health, Sales & Marketing, Manufacturing, Logistics, Business Travel Center
REGIONAL CRISIS MANAGEMENT TEAM	
Business Unit VPs	<ul style="list-style-type: none"> ▪ Regional Business Continuity Planning sponsor & CMT Chair
Business Unit Executive Staff	<ul style="list-style-type: none"> ▪ Regional Business Unit CMT Members
Manufacturing VPs & GMs	<ul style="list-style-type: none"> ▪ Regional Business Unit CMT Members
Manufacturing HR Directors	<ul style="list-style-type: none"> ▪ Regional Business Unit CMT Member
Director Communications	<ul style="list-style-type: none"> ▪ Regional Business Unit CMT Member
Specialist Support as necessary	<ul style="list-style-type: none"> ▪ Facilities, Security, IT
LOCAL/FACILITY CRISIS MANAGEMENT TEAM	
Manufacturing VPs & GMs or Facility Director	<ul style="list-style-type: none"> ▪ Local Business Continuity Planning sponsor & CMT Chair
Manufacturing HR Directors or Facility staff	<ul style="list-style-type: none"> ▪ Local CMT Members ▪ Direct Human Resources CMT response & Plant Emergency Organization, Security, Environmental, Health & Safety.
Plant Emergency Organization	<ul style="list-style-type: none"> ▪ Execute local CMT action plan
Manager of Communications	<ul style="list-style-type: none"> ▪ Local CMT member ▪ Direct communications and community relations CMT response

APPENDIX E – CRISIS COMMUNICATIONS POLICY

POLICY OWNER: Global Communications	EFFECTIVE: AUGUST 2003 REF: 1.4 SUPERSEDES: New	PAGE: 1 of 2
SUBJECT: CRISIS COMMUNICATIONS POLICY	APPLIES TO: All Operations Globally	

1.0 INTRODUCTION Crisis Communications is a key element of crisis management and is designed to communicate timely, accurate information to all ACBMS Company stakeholders and the media during any local, regional, or global crisis. While crises are unpredictable, advanced communications planning can positively impact media perceptions, employee reactions, investor confidence, and ultimately minimize business disruptions.

2.0 POLICY ACBMS Company's Crisis Communications Policy, part of its Business Continuity Policy (1.0) and Crisis Management Policy (1.3), is to take all reasonable and appropriate steps necessary to ensure designated staff effectively communicates timely, accurate information to all appropriate ACBMS Company stakeholders during any significant unplanned event affecting its business, reputation, people, or property. Global Communications coordinates all crisis communication, however, crisis communication planning to minimize the impact of natural or human-caused events and ensure the company's success is the responsibility of designated ACBMS Company communicators.

3.0 PURPOSE & SCOPE This policy provides guidelines for development of crisis communications plans, as well as the maintenance and testing of such plans. Reporting to the Crisis Management Team (CMT) led by the President, all businesses must develop, maintain and exercise Crisis Communications plans as part of their Crisis Management plans, consistent with the Business Continuity Planning Policy and Crisis Management Policy.

4.0 DEFINITION The ACBMS Company Crisis Management policy states that a crisis at ACBMS Company is any global, regional or local incident or situation that runs the risk of:

- causing harm to people or damage to property or the environment
- escalating in intensity, or adversely impacting shareholder value of the company's financial position
- falling under close unsolicited media, government or regulatory authority scrutiny
- interfering with the normal business operations
- wasting significant management time and/or financial resources
- adversely affecting employee morale
- jeopardizing the positive public image of the company, its brands and its officers or employees.

5.0 PHASES ACBMS's Business Continuity and Crisis Management policies divide crisis events into five phases = **PR⁴**.

- **Prevention** - Proactive planning and execution of pre-incident measures to manage risk or lessen incident impact.
- **Response** - Planning and execution of initial crisis response to protect people, property, share value, and public image.
- **Resumption** - Planning and execution of strategies to resume time-sensitive operations following an event.
- **Recovery** - Planning and execution of strategies to recover less time-sensitive operations following an event.
- **Restoration** - Planning and execution of long-term restoration strategies leading to normal business operations.

Crisis Communication focuses on the Prevention and Response phases since Resumption, Recovery, and Restoration relate to long-term rebuilding of assets lost in a natural or human-caused event. **Crisis Communication phases** include:

- **Assess** - Assess the crisis severity and scope with the CMT to gauge communications needs, tools and timing.
- **Notify** - Notify key constituents of the crisis in a timely fashion (within one hour depending on the level of crisis).
- **Inform** - Communicate with key internal and external audiences, providing news and updates.
- **Respond** - Provide timely response to inquiries from the media and other stakeholders.
- **Record** - Track and record inquiries and outgoing information.
- **Collect** - Gather copies of articles, interviews, media, etc., resulting from the incident/situation.
- **Evaluate** - Evaluate the execution of crisis communication plans and implement process improvements.

6.0 PLAN A Crisis Communications Plan, incorporated in all Crisis Management Plans shall include, but is not limited to:

- **Scope** - a definition of the scope of the plan (local, regional, corporate)
- **Crisis Communications Team Roster** – a listing of individuals from various departments with responsibilities for implementation of the plan
- **Crisis Gauge** - criteria used to determine the potential impact of the crisis, level of disclosure, resources and assets needed.
- **Notification Procedure and Communication flow** - a chart outlining the communications flow within the scope of the plan.
- **Target Audiences** – all potential internal/external audiences with whom communication may or may not be appropriate.
- **Media Policy** - guidelines to ensure that designated, trained spokespeople communicate with the media.
- **Records** - guidelines for maintaining detailed and comprehensive records about the event and the information flow.
- **Communication Tools and Templates** - samples of communication tools (i.e., standby statements, key messages, fact sheets, press releases, potential questions and answers) adaptable to the situation.
- **Crisis Communication Exercises** - an outline for periodic testing of Crisis Communication plans in a mock crisis.

POLICY OWNER: Global Communications

EFFECTIVE: AUGUST 2003 REF: 1.4 SUPERSEDES: New

PAGE: 2 of 2

SUBJECT: **CRISIS COMMUNICATIONS POLICY**

APPLIES TO: All Operations Globally

7.0 CATEGORIES and VULNERABILITIES ACBMS Company's Business Continuity and Crisis Management policies identify five crisis categories (shaded areas). Each category has numerous vulnerabilities illustrated by the examples provided.

Business - An incident that adversely impacts ACBMS Company's competitive position, tarnishes its reputation or brand names, or reduces workforce morale and productivity.

- | | |
|--|---|
| <ul style="list-style-type: none"> ▪ Loss of significant trade partner ▪ Product failure resulting in injury or death ▪ Product failing to meet requirements, negative publicity ▪ Product recall ▪ Government regulatory compliance ▪ Charges of fraud or unethical behavior by an individual ▪ Charges of fraud or unethical behavior by ACBMS Company ▪ Labor dispute, union strike, work slowdown or stoppage ▪ Plant, office or business shutdown, or closure ▪ Antitrust | <ul style="list-style-type: none"> ▪ Acts of war or terrorism ▪ Financial mismanagement ▪ Supply chain disruption ▪ Serious legal issue, i.e., litigation, criminal activity ▪ Significant negative media and/or internet coverage ▪ Offensive advertising ▪ Regional currency or other political crisis ▪ Hostile corporate takeover, merger or other material reorganization ▪ Worker layoff |
|--|---|

Information - The unauthorized disclosure or compromise of ACBMS COMPANY CONFIDENTIAL information that would likely have an adverse impact on the company's competitive position, tarnish its reputation, or embarrass an individual.

- | | |
|--|--|
| <ul style="list-style-type: none"> ▪ Customer information compromise ▪ Personnel information compromise ▪ Financial performance information compromise ▪ Pricing information compromise ▪ Research or new product design compromise ▪ Industrial espionage | <ul style="list-style-type: none"> ▪ Product or marketing plan information compromise ▪ Loss of trade secrets or trademark infringement ▪ Proprietary process or system information compromise ▪ Merger or acquisition plan compromise ▪ Stolen laptop with highly confidential information |
|--|--|

Information System - An incident or threat that affects information systems confidentiality, integrity, or availability.

- | | |
|--|--|
| <ul style="list-style-type: none"> ▪ Virus or other malicious code attack ▪ Denial of service attack ▪ Compromise of system confidentiality via hacker attack ▪ Password file loss ▪ Computer crime – unspecified other | <ul style="list-style-type: none"> ▪ Compromise of consumer credit files in e-commerce. ▪ Loss of production, order processing, warehousing, logistics, accounts payable or receivable, payroll, etc. ▪ Data center power failure, fire or other incapacitation |
|--|--|

People - An incident that affects the safety, security or productivity of ACBMS Company people.

- | | |
|---|--|
| <ul style="list-style-type: none"> ▪ Death or serious injury that is work-related ▪ Workplace violence ▪ Bomb threat ▪ Executive group tragedy, i.e., plane crash ▪ Senior management death or serious injury ▪ Sexual harassment charge ▪ Substance abuse | <ul style="list-style-type: none"> ▪ Kidnapping ▪ Ransom or extortion ▪ Random street crime, i.e., mugging, robbery, rape ▪ Sabotage ▪ Terrorism involving an employee or company facility ▪ Political unrest involving employees or families ▪ Breach of privacy |
|---|--|

Property - A natural or human-caused event affecting the facilities or operational continuity of ACBMS Company or its suppliers, trade channels, and joint venture partners, subsidiaries and affiliates.

- | | |
|--|--|
| <ul style="list-style-type: none"> ▪ Natural disaster (hurricane, flood, earthquake, tornado) ▪ Severe weather (thunderstorm, heavy snow, ice storm) ▪ Fire or explosion ▪ Roof collapse ▪ Facility intrusion | <ul style="list-style-type: none"> ▪ Human-caused industrial accident ▪ Environmental hazard - mishandling wastes ▪ Chemical spill or air pollution ▪ Ground water contamination ▪ Vehicle accident or significant cargo loss |
|--|--|

APPENDIX E – CRISIS COMMUNICATIONS PLAN

INTRODUCTION

Crisis Communications, a vital part of crisis management, is a strategy to communicate timely, accurate information to appropriate ACBMS Company stakeholders and the media during any local, regional or global crisis. ACBMS Company is vulnerable to any number of potential crises that could have a negative impact on the company. Most crises are unpredictable; however, advanced planning to communicate effectively during a crisis can positively impact media perceptions, employee reactions, investor confidence and ultimately, business interruptions.

It is ACBMS Company's policy to take all reasonable and appropriate steps necessary to ensure designated staff effectively communicate timely, accurate information to all appropriate ACBMS Company stakeholders during an event affecting its business, reputation, people, or the tangible (property) and intangible (intellectual property) resources used to execute key business processes. Global Communications coordinates all crisis communication; however, crisis communication planning to minimize the impact of natural or human-caused events and ensure the company's success is the responsibility of all ACBMS Company people.

SCOPE

In accordance with the Crisis Communication Policy, this plan describes how (name of business) will handle communications in the event of a crisis. Although specific to (name of business) the plan follows the framework provided in the Policy. This plan is used in conjunction with the Crisis Management Policy, under the overall umbrella of the Business Continuity Policy. This plan is to be used at any time a crisis is directly related to this business and is localized to (the name of site/region/business unit?). Additionally, this plan serves as the local component to support any crisis of a corporate or global nature where support and communications by (this business) is necessary.

DEFINITION OF CRISIS

The ACBMS Company Crisis Management policy states that a crisis at ACBMS Company is any global, regional or local incident or situation that runs the risk of:

- escalating in intensity, or adversely impacting shareholder value of the company's financial position
- causing harm to people or damage to property or the environment
- falling under close media or government scrutiny
- interfering with the normal business operations
- wasting management time and/or financial resources
- affecting employee morale
- jeopardizing the positive public image of the company and its officers.

CRISIS COMMUNICATIONS TEAM

The Crisis Communications Team (CCT) is a group of individuals with specific responsibilities in the event of a crisis. The purpose of the team is to work closely with the Crisis Management Team (CMT) to assess the initial report of the crisis, gather information, disseminate information to appropriate stakeholders, work with the media and monitor the information flow throughout the duration of the crisis. Team members work together to bring closure to the crisis, monitoring any follow up issues and managing ongoing media interest. The CCT meets at least biannually to review its responsibilities and update this plan. Some team members may vary, depending on the nature of the crisis, however the core team remains as identified herein.

The Crisis Communications Team for (name of business) consists of:

(Suggested titles/positions - each business to identify specific individuals and tailor as needed)

- **Crisis Communications Manager** *(the senior global communications professional for the business)* - Overall responsibility for media and stakeholder communications; this is the designated spokesperson for (business); works closely with Crisis Management Team Manager.
- **Communications Coordinator** - Supports the needs of the Crisis Communications Manager; ensures the communications flow is followed; assists with the writing of press releases, statements and gathering information.
- **Legal Counsel** - Reviews legal implications of the situation and provides review, as appropriate, to written and verbal communications issued.
- **Consumer Product Safety Coordinator** – Supports the needs of crisis communication manager; assures factual consistency of communications with internal and external functions, as well as federal, state and provincial agencies.

- **Logistics Manager** - Coordinates basic on-site and/or off-site communications needs; may also assist with travel and transportation needs of team members or other company representatives.
- **Technology Coordinator** - Oversees any specialized computer/fax/telephone requirements to support the communications effort; coordinates necessary linkages with other businesses or corporate offices.
- **Secretary** - Coordinates distribution of documents (printing, production, mailings) maintenance and distribution of reports, handles receives incoming calls and other clerical duties.

(Business prepares a graphic flowchart once individuals are identified) Depending on the business and the nature of the crisis, other areas to include on the team: product/manufacturing; human resources; finance; sales/marketing; outside public relations/advertising consultants.

CRISIS GAUGE

In order to determine the potential severity of a crisis, a specific set of guidelines and criteria is utilized by the Crisis Management Team and the CCT. This assessment determines the level of disclosure about the situation, what human resources and communications resources need to be accessed, the timing on communications, media contact and other decisions.

(Expect that specific criteria be developed in Crisis Management Plans and can be discussed here?)

These criteria should include, but are not limited to:

- *What resources are required to manage the crisis?*
- *Is it local, regional, or global?*
- *Is it likely to generate local or broader media coverage?*
- *Will it be of short or long duration?*
- *What is the potential financial exposure?*
- *What is the impact on employees?*

(Others to be added)

NOTIFICATION PROCEDURE AND COMMUNICATION FLOW

A critical component of the crisis communications plan is the flow of information, from the initial notification about the crisis, to the appropriate internal and external audiences. The crisis will first be reported to the Crisis Management Team (CMT) according to the Crisis Management Plan. The Crisis Communications Team (CCT) is notified immediately and the following procedure is followed:

1. Crisis Management Team immediately notifies Crisis Communications Manager.
2. Crisis Communications Manager immediately assembles Crisis Communication Team.
3. Unavailable team members are notified using most immediate available tool (phone/pager).
4. CCT reviews available information.
5. CCT notifies others (non-team members) as deemed appropriate.
6. CCT establishes media center (if necessary) and addresses communication logistics.
7. CCT begins to disseminate information to appropriate stakeholders and responds to media inquiries, according to media policy.
8. CCT remains informed of updates on crisis by CMT.
9. CCT updates media and other appropriate stakeholders as needed and appropriate.
10. CCT maintains records to track incoming inquiries and outgoing information.
11. CCT circulates copies of media coverage to CMT and other appropriate personnel.
12. CCT compiles a comprehensive report as crisis ends.

TARGET AUDIENCES

The audiences may vary, depending on the situation. Potential audiences for consideration include:

- Employees and their families
- Media (local, regional, national, international) - *(list of specific local/regional/business media covering this business is an attachment to the plan)*
- Shareholders
- Site neighbors and community leaders
- Retirees
- Trade partners/vendors
- Customers
- Government/regulators

Methods of communication with these audiences may include:

Internal Audiences: (*business to specify most appropriate depending on crisis*): Face-to-face, email, memo, bulletin board, video bulletin board, intranet

External Audiences: press briefings, press releases, website, letter, advertising, telephone (800-info line), and email

MEDIA POLICY

In accordance with company policy, all contact with the media shall be through (*name individual*) the representative of Global Communications with responsibility for (*name of business*). (*This individual*) is also the Crisis Communications Team Manager and has completed crisis communications training. Any call from the media received by any ACBMS Company employee will immediately be passed on to (*Manager*). Depending on the nature of the event, the CMT and the CCT may determine that an additional spokesperson (or people) with certain expertise may be required. These additional spokespeople will be identified and guided by the CCT and the CMT.

All spokespeople adhere to these basic guidelines for working with the media:

1. Only agreed upon spokesperson/people talk to the media
2. Maintain a comprehensive log of inquiries and responses (contact info and nature of inquiry)
3. If information is unknown or unavailable, agree to get back to media contact
4. Be cooperative and show compassion
5. "NO COMMENT" is not an option
6. Use prepared, approved statements as needed
7. Do not speculate, guess or give false information
8. Avoid jargon
9. Deliver key messages whenever possible
10. Nothing is "off the record"
11. Choose interview locations carefully (no burning buildings or ambulances in the background)

RECORD KEEPING

Comprehensive records will be kept about the crisis and the information flow. The records are used to inform others, track the flow of communications, maintain facts about the situation, list media contacts, etc. A media monitoring company will be engaged to collect coverage. Attached to this plan are sample forms:

- Telephone log used to record initial report of crisis and all subsequent calls pertaining to the crisis. This includes calls to and from the media as well as to and from other stakeholders. Names, dates, time, phone number and details of call to be included in record (email inquires also tracked).
- Forms on which to list media coverage, including date, media, contact, and a summary of the report (a copy of the article/transcript of audio attached for the record).
- Copies of all outgoing communications issued by ACBMS Company with a list of recipients.

COMMUNICATIONS TOOLS AND TEMPLATES

Attached to this plan are samples of communication tools that can be adapted to the various situations. The tools and templates include:

- Sample standby statements
- Sample press releases
- Potential questions
- Company fact sheets (*fact sheets pertaining to this business*)
- Key messages (*both Corporate and for this business*)

CRISIS INFORMATION CENTER/SUPPORT FACILITIES

The (*describe location at facility*) will be used as the Crisis Information Center for (*business*). If offsite facilities are required (*name a previously identified offsite facility, hotel, or neighboring office conference space*) will be utilized. This facility is separate from the Crisis Control Center and will be the location for press briefings and on-site media interviews. The Logistics Manager and Secretary will assume responsibility for equipping the room with telephones, computers, tables, chairs, podium, audio/visual equipment, coffee and refreshment station, and other equipment as may be needed.