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Business Continuity Policy

MASORANGE

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Distribution list

- MasOrange Business Continuity Stakeholders





Changelog

Version	Date	Changes from last version
1	19/04/2017	Initial version of the Orange document.
2	09/05/2017	Changes after internal audit held in April 2017, where it was requested to complete the policy with the principle of satisfying the interests and requirements of the interested parties.
3	19/12/2018	Extension of section 1.2 Applicability.
4	28/01/2019	Inclusion of television in the scope phrase of Annex 1.
5	16/11/2020	Update signs new CEO
6	23/08/2023	Policy Overview Responsible Update Update and signing new CEO
7	19/07/2024	Adaptation of the Policy to MASORANGE CEO Approval
8	12/11/2025	General policy review Update of context and responsibilities Expansion of the Third-Party section Relationship with other MASORANGE Policies



Foreword

The main objective pursued by MASORANGE's Business Continuity Management System (BCMS) is to safeguard the processes and services offered to our customers, ensuring the continuity of business activities in the face of incidents or disasters of significant magnitude.

To this end, and as part of its commitment to Business Continuity, MASORANGE's management establishes and adopts the following principles and commitments:

- Provide the necessary resources to maintain the BCMS and ensure MASORANGE's business continuity and its critical processes.
- Ensure the identification of potential threats that may endanger MASORANGE's business continuity or trigger a crisis within the organization.
- Conduct a risk analysis evaluating the impacts and business objectives for prevention and the definition of their recovery levels, prioritizing the continuity of critical activities.
- Improve the company's resilience and robustness by providing the pertinent measures to respond effectively to the occurrence of scenarios with sufficiently significant impacts.
- Preserve the interests of the system's stakeholders, as well as the reputation, the brand, and value-creating activities.
- Meet and enforce all necessary requirements for the proper performance of the BCMS, improving the company's BCMS continuously and proactively.
- Execute a calendar of tests and drills to ensure the effectiveness of the defined recovery plans.
- Ensure the rapid response of all mechanisms present in the BCMS intended to mitigate the risks identified within the system.
- Implement the necessary mechanisms to respond to crises, safeguard the health and safety of people, and ensure the return to operation of essential business processes in the shortest possible time and with the minimum disruption.

MASORANGE's management team leads and supports the BCMS, fostering the definition of continuous improvement objectives for the BCMS. It also ensures compliance with this Policy within the organization, thereby ensuring an effective business continuity performance.

Madrid, 12/11/2025

Meinrad Spenger

CEO



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1. Introduction

1.1. Purpose

Business Continuity is defined as *“the ability of an organization to continue delivering its products and services within acceptable timeframes and at a predefined level during an interruption”* in accordance with the ISO 22301 standard.

Business Continuity Management (hereinafter BCM) aims for the continuity of the essential activities of MASORANGE's business services, fostering resilience and the ability to recover when these are disrupted for any reason. This process contributes to MASORANGE's mission to offer services with a high level of quality and to meet customers' expectations of working with a trusted operator.

The objective of this **Business Continuity Policy** is to describe and formalize MASORANGE's position regarding Business Continuity, as well as to define the main guidelines of Business Continuity Management aligned with the corporate context and with the organization's strategic mission and vision.

This policy serves as the reference framework for the Business Continuity Management System (hereinafter BCMS), acting as the cornerstone for the definition of objectives, the operation, and the improvement of Business Continuity.

1.2. Context

The implementation and maintenance of a BCMS respond to the corporate objective of ensuring maximum availability and quality of MASORANGE's services and are aligned with MASORANGE's purpose and vision.



Purpose

To (re) connect people by putting technology to work to provide the best experience.

- We humanise technology. We make communication between people easier and bring them closer together, wherever they are.
- We accelerate access to innovative services, collaborate with the best companies in the world, and protect our customers and their data.
- We offer our customers an easy, simple and hassle-free experience.



Vision

To be the leading company in customer satisfaction, talent and positive impact.

- To create the company with the most positive impact in Spain, thanks to its respect for people and the planet.
- To make technology accessible to everyone.
- To develop new services that are useful for our customers.
- To have the best talent: "good people".
- To contribute to society through technology and connectivity.

The business continuity processes included within the BCMS enable an effective and efficient response to potential incidents and relevant disasters, and if these management processes did not exist, they could entail a significant impact on MASORANGE's ability to achieve its objectives in the short and long term.



The main benefits that the BCMS contributes to MASORANGE's strategy are the following:

- Improve the company's operational performance, promoting risk reduction, reduction of downtime, and improvement in competitiveness,
- Ensure the satisfaction of the needs and interests of MASORANGE's customers, the company's staff, and other relevant MASORANGE stakeholders,
- Protect the tangible assets and the business know-how,
- Improve security and,
- Preserve MASORANGE's image and reputation.

1.3. Scope

This policy applies to all MASORANGE entities in Spain, including the expectations of identified internal and external stakeholders.

More specifically, the Business Continuity Policy covers:

- MASORANGE's fixed-line network, mobile network, digital **services**, and television services, for both B2C and B2B, the critical **customer-journey processes** and the **supporting processes**.
- The **technology, systems**, and essential **telecommunications networks** to guarantee continuity of the critical processes.
- The **critical infrastructures and data centres** that host the company's systems and networks.
- MASORANGE **employees**, especially those with roles and assigned responsibilities within the BCMS.
- Critical service **providers** participating in MASORANGE's supply chain.

Business Continuity Management is understood as a cross-cutting discipline within MASORANGE and is considered an element of Global Security. It relates to the following security domains: People Safety and Health; Physical Security and Fire Protection; Information Security; and Environmental Security.

2. Principles for Business Continuity

The following outlines the principles governing MASORANGE's Business Continuity Management System:

1. Satisfaction of the interests and requirements of interested parties is considered to ensure that the system meets the business needs and supports the achievement of corporate objectives and legal and regulatory compliance.



2. MASORANGE top-management ensures compliance with the Business Continuity Policy, governs Business Continuity, and allocates the necessary resources for BCM to fulfil its purpose.
3. To develop continuity and resilience at MASORANGE, it is essential to identify the critical processes and their assets, as well as their criticalities. Service providers that form part of the value chain are an essential aspect of BCM.
4. BCM maintains a risk-based approach, including in its scope environmental, climatic, technological, cyber, and physical threats, as well as those related to the safety and health of people.
5. BCM requires appropriate training and awareness for personnel involved in the system to ensure their proper performance of the processes and a rapid response in the event of an incident or crisis.
6. Business continuity processes are continually improved to ensure incremental and sustained assurance over time.

To align with the above principles, MASORANGE implements a **BCMS (Business Continuity Management System)** whose objective is to implement, operate, monitor, review, maintain, and improve Business Continuity within the organization. The BCMS is subdivided into the following base processes:

- **Business Impact Analysis (BIA).** The Business Impact Analysis (BIA) is the process that evaluates the time-based consequences of an interruption on the processes within scope. It enables identifying impacts, the maximum tolerable downtime (MTD), and the minimum requirements to continue activity, even in degraded mode. It also determines priorities and helps define continuity and recovery strategies.
- **Risk analysis, treatment and management.** Develops the study and assessment of risks that could jeopardize business continuity and, therefore, the achievement of MASORANGE's strategic objectives. It applies a risk management and informed decision-making approach based on strategies that consider the entity's current acceptable level of Business Continuity risk.
- **Business Continuity Plans and recovery strategies.** Defines plans, strategies and procedures (Disaster Recovery Plans, DRP) detailing how MASORANGE can restore and recover its critical processes and services within acceptable times. The plans and strategies include containment and treatment of damages, partial or degraded execution of affected processes and services, and ultimately full-service recovery.
- **Communication.** Defines the necessary communications for the proper functioning of the BCMS processes and ensures that the different resources and teams are coordinated and aware of their responsibilities or obligations.
- **Incident management.** Ensures that incident management plans are in place to detect, respond to, and recover services affected by the incident within the established times.
- **Crisis management.** Manages the operations and internal and external communications necessary to restore the company's activities when facing severe incidents that exceed crisis thresholds.



- **Training and awareness.** Ensures that the necessary knowledge is imparted and that personnel are adequately aware of their responsibilities and roles in MASORANGE's business continuity.
- **Testing and drills management.** Maintains a program of business continuity tests and drills conducted at regular intervals, allowing analysis of the effectiveness of recovery strategies, review of the participation of the various actors, and evaluation of the response capability to disasters or crises.
- **Monitoring and continuous improvement.** Ensures the effectiveness and control of the system in a proactive and objective manner by incorporating indicators and conducting BCM audits. Improvement is incorporated into the BCMS through audits and reviews and the implementation of improvement actions derived from findings and crises.
- **Management review.** Periodic oversight by management to evaluate the effectiveness, adequacy, and usefulness of the BCMS.

3. BCMS objectives

MASORANGE adopts the following general objectives for the Business Continuity Management System (BCMS), to support the mission of protecting service continuity:

- **Ensure an adequate level of service availability** across MASORANGE's processes and services.
- **Improve the security of MASORANGE's assets and personnel**, preventing risks and supporting the management of emergencies and crises.
- **Ensure efficient compliance** with applicable legal and regulatory obligations for MASORANGE.
- **Preserve corporate reputation** by protecting the brand image and maintaining the trust of customers, partners, and employees, as well as the organization's credibility during and after a significant disruption.
- **Develop business continuity plans** that align with the company's changing needs, prove their effectiveness through annual tests and audits, thereby improving resource planning to guarantee business continuity.
- **Incorporate best practices** in actions to systematically, continuously, and efficiently meet the above continuity objectives in the face of internal and external changes.

Building on these general objectives, in the BCMS annual cycles, specific objectives are defined that contribute to continual improvement in four phases: anticipation, prevention, protection, and improvement. The definition and monitoring of objective achievement are part of Management Review.



4. Organization and communication

4.1. Organization and responsibilities

To successfully achieve the Business Continuity objectives, MASORANGE establishes a governance and management structure to coordinate the implementation and operation of the BCMS.

The detailed set of responsibilities and duties of personnel is specified within the BCMS documentation framework. Responsibilities are communicated and clarified, and employees are provided with the necessary training and awareness to perform them.

The main responsibilities within the BCMS are identified below:

Crisis Executive Committee

Comprised of senior management, including the company CEO, it is the ultimate authority over MASORANGE's operations and service continuity.

It is responsible for declaring and managing red crises, as well as nominating and training MASORANGE's Crisis Committee.

As representative of the Executive Committee, the CEO signs and endorses the Continuity Policy.

Crisis Committee

Comprised of senior representatives from MASORANGE's principal areas and nominated by the Crisis Executive Committee; it is responsible for risk management and the continuous improvement of the BCMS.

Its mission is to protect service availability and ensure the proper deployment of continuity plans, identifying continuity-related objectives and strategies and monitoring their implementation. In a crisis, it is responsible for managing yellow crises.

Crisis Management Team

The Crisis Management Team is formed by the BCM interlocutors from each area of the organization, serving as the focal contact point between the different lines of defence.

They coordinate the Business Continuity initiatives within their areas of influence, participate in the development of Business Continuity and Disaster Recovery Plans, assist in conducting Business Impact Analyses, and participate in audit and continuous improvement processes.

Operational Team

Front-line personnel responsible for operating services and processes, keeping assets available.

They test and execute the Business Continuity and Disaster Recovery Plans, ensuring that the technical crisis-related functions associated with each area can be carried out.

BCMS Team



The implementation, operation, and maintenance of the BCMS is under the responsibility of the BCMS team, led by MASORANGE's Chief Security Officer (CSO).

4.2. Communication

Coordinated communication between stakeholders is necessary for the proper functioning of the BCM and act as a key process of the BCMS.

The required internal and external communications have been identified in accordance with the stakeholder expectations. BCMS develops communication procedures for both normal operations and during crises.

Regarding the Business Continuity Policy, the Crisis Committee promotes its ongoing validity, publication, and distribution to all employees, as well as to third parties interested in MASORANGE's Business Continuity.

5. Third parties

Given the relevance of the supply chain to MASORANGE's service and operations continuity, suppliers providing critical services will be under the scope of this Policy and the rest of MASORANGE's Business Continuity and Crisis Management procedures.

MASORANGE includes suppliers in the Business Impact Analysis (BIA) process, identifying their dependencies, assessing their criticality for the processes, and implementing continuity requirements appropriate to the level of risk.

This third-party control process is included within the supplier relationship lifecycle, periodically monitoring the existence of Business Continuity Plans and the ongoing execution of the tests and exercises program.

Regarding other third parties, as part of the BCMS an annual analysis of external stakeholders and their expectations is conducted, managing the findings and identified risks.

6. Applicable legislation and regulation

Compliance with legislation applicable to Business Continuity is considered fundamental at MASORANGE.

The BCMS promotes this compliance by identifying and updating the legal and regulatory requirements applicable to the Business Continuity scope, analyzing their scope, and planning the necessary actions to ensure proper compliance.

The BCMS maintains a register of applicable legislation that includes both laws and regulations as well as voluntary standards of good practice to which MASORANGE subscribes.



7. Compliance

Compliance with this Policy is mandatory for all MASORANGE employees, contractors, and service providers within the specified scope.

Any violation of the policies may give rise to contractual claims and/or termination of contracts with contractors or third parties, as well as contractual claims and/or disciplinary measures against MASORANGE employees.

Any situation in which compliance with this Policy is not possible will be considered an exception, and will be handled as such by the Security department, with a risk-based approach.

8. Policy review

This Policy will be reviewed periodically within the PDCA cycle, and in any case whenever there are significant changes in the business context, the scope of the BCMS, the legislation and/or the risk landscape of MASORANGE.

The Crisis Committee will oversee the review and evaluation of the adjustment of the Policies defined to the requirements of MASORANGE, ensuring the existence of an updated policy focused on the objectives that the organization sets at all times.

9. External references

9.1. Regulations and legislation

- a) ISO/IEC 22301: The security of society – Business Continuity Management System – Requirements.
- b) ISO/IEC 27001: Information Security Management System
- c) Law 8/2011, of 28 April, which establishes measures for the protection of critical infrastructures.

9.2. Guides

- a) ISO 22313: Societal security - Business continuity management systems – Guidance
- b) ISO/IEC 27031: Guidelines for the preparation of information and communication technologies for business continuity.