Pandemic Management Plan

Operational Risk Plan | Global

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Replace all references to “the Company” with your organisation’s name.

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1. Purpose

This Pandemic Management Plan (the Plan) sets out how the Company prepares for, responds to and recovers from a pandemic or major infectious disease event that threatens the health of its people or the continuity of its critical operations. It defines the pandemic phases the Company monitors, the triggers that activate a response, the team that leads that response and its authorities, the workforce, customer, supplier and communication measures to be applied at each Response Level, and the criteria for standing down and returning to normal operations.

The Plan gives effect to the Company's commitment to maintain credible plans for severe but plausible disruption scenarios, consistent with ISO 22301 and the BCBS Principles for Operational Resilience, and to its duty of care to staff, customers and visitors under applicable occupational health and safety law. A pandemic differs from most continuity scenarios: premises and systems generally remain intact while people are progressively unavailable, official restrictions change frequently, and the event may persist for months rather than days. This Plan is therefore people-led and phase-based rather than site-led.

The Plan incorporates, as standing practice, the lessons the Company and the global financial sector learned from the COVID-19 pandemic, including large-scale remote working, split-team arrangements, digital-first customer service, supplier fragility and the importance of sustained staff welfare support.

The Plan is owned by the Chief Risk Officer and approved by the Chief Executive Officer, with material amendments noted to the Board Risk Committee. It is a component of the Company's business continuity framework and operates in conjunction with, and subordinate to, the Crisis Management Plan.

2. Scope

This Plan applies to the Company and all of its controlled entities, and to all directors, employees, contractors, secondees and agency staff (together, staff) at all locations, including staff working remotely. It covers all business units, critical operations, customer channels (branches, contact centre, digital and payments channels) and material service providers.

The Plan applies to any pandemic or significant epidemic event, whether characterised by the WHO or declared by the public health authorities in the Company's operating jurisdiction(s), and to any precursor outbreak that the Chief Risk Officer assesses as reasonably likely to escalate to such an event. It may also be applied, with appropriate adaptation, to other widespread communicable disease events affecting the workforce.

This Plan does not replace the Business Continuity Plan, the Crisis Management Plan or the Disaster Recovery Plan; it supplements them for pandemic-specific circumstances and relies on their structures, registers and recovery procedures. Where a pandemic coincides with another disruption (for example a technology outage), the Crisis Management Plan governs overall prioritisation and command.

- In scope: workforce health measures, Response Level escalation, continuity of critical operations, customer channel measures, supplier continuity, communications and regulatory notifications, recovery and stand-down.
- Out of scope: clinical or medical advice (the Company follows the directions of the public health authorities); detailed technology recovery procedures (Disaster Recovery Plan); and financial crisis measures such as capital or liquidity contingency actions (Contingency Funding Plan and Recovery and Exit Plan).

2.1 Jurisdictional application

This Plan states international best practice drawn from ISO 22301, the BCBS operational resilience principles and WHO guidance. The Company must map its requirements to the laws, public health frameworks and regulatory expectations of each jurisdiction in which it operates, including employment, privacy, health and safety and financial services law. Where the law of an operating jurisdiction imposes a stricter or additional requirement, local law prevails over this Plan.

3. Definitions

Term	Definition
Pandemic	An outbreak of infectious disease that spreads across multiple countries or continents with sustained community transmission, affecting a large proportion of the population, as characterised by the World Health Organization (WHO) or declared by the public health authorities in the Company's operating jurisdiction(s).
Epidemic	An outbreak of infectious disease affecting a community, region or country at a rate materially above normal expectations, which may or may not escalate to a pandemic.
PHEIC	A Public Health Emergency of International Concern declared by the WHO Director-General under the International Health Regulations (2005), including a determination of a pandemic emergency under the 2024 amendments to those Regulations.
Pandemic Response Team (PRT)	The cross-functional team appointed under this Plan to direct the Company's preparation for, response to and recovery from a pandemic, operating under the authority of the Crisis Management Team.
Crisis Management Team (CMT)	The standing senior executive team, chaired by the Chief Executive Officer or delegate and constituted under the Company's crisis management

	arrangements, with overall authority to direct the Company's response to a declared incident, crisis or severe disruption, including activation of business continuity, recovery and related plans.
Response Level	One of the four graduated levels of internal response (Level 0 Monitor, Level 1 Prepare, Level 2 Respond, Level 3 Sustain) defined in this Plan and keyed to external public health alerts and internal impact indicators.
Activation	The formal decision, made by an authorised person under the governance arrangements of the relevant plan, to invoke that plan, mobilising the designated response or crisis management team and moving the Company to the applicable response, recovery or exit footing.
Stand-Down	The formal decision, taken against the stand-down criteria in the relevant plan, that crisis or incident response arrangements are no longer required, by which the response is de-escalated or closed and management of any residual activity reverts to business-as-usual structures.
Critical Operation	An activity, process or service performed by the Company, or by a service provider on its behalf, which, if disrupted beyond the Company's impact tolerance, would cause material harm to depositors, customers or counterparties, pose a risk to the Company's safety and soundness, or impair its role in the financial system, consistent with the BCBS Principles for Operational Resilience.
Tolerance for Disruption	The Board-approved maximum level of disruption to a critical operation that the Company is prepared to accept under severe but plausible scenarios, expressed as a maximum period of disruption, a maximum extent of data loss and a minimum service level to be maintained, consistent with the impact-tolerance concept in the BCBS Principles for Operational Resilience.
Business Impact Analysis (BIA)	The structured assessment of the Company's business processes to determine their criticality and interdependencies, the impacts that would

	arise over time from their disruption, and the recovery time objectives, minimum acceptable service levels, resources and dependencies required for recovery, undertaken consistent with ISO 22301 and ISO/TS 22317.
Absenteeism Rate	The percentage of rostered staff (including contractors performing staff roles) unavailable for work on a given day due to illness, carer responsibilities, isolation requirements or inability to attend or connect remotely.
Split-Team Arrangement	The division of a team performing a critical operation into two or more sub-teams that work from separate locations (or on alternating rosters) and do not mix physically, so that one sub-team's exposure does not incapacitate the whole function.
Minimum Operating Strength	The smallest number of trained staff, documented for each critical operation in the Business Continuity Plan, with which that operation can be sustained at its minimum acceptable service level.
Material Service Provider	A third party, including an intra-group provider, on which the Company relies to deliver a critical operation or to manage a material risk, or whose failure or compromise would otherwise expose the Company to material operational, financial, technology or compliance risk, together with material subcontractors in its supply chain, as recorded in the Company's service provider register.
Personal Protective Equipment (PPE)	Equipment used to reduce transmission risk, including masks, gloves, sanitiser, protective screens and associated cleaning consumables.
Employee Assistance Program (EAP)	The confidential counselling and psychological support service the Company makes available to staff and their immediate families.

4. Regulatory Framework

The key legislation, regulations and standards relevant to this document include (as amended from time to time):

Instrument / Standard	Relevance

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.