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Business Continuity Management

Enterprise Position Paper



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Overview

Kyndryl maintains comprehensive plans that adhere to its global enterprise policy, standards, and guidelines. These plans are designed to ensure business continuity by proactively assessing and preparing for potential disruption.

Kyndryl defines Business Continuity as the organization's ability to sustain critical operations during multiple disruptive events. These events include natural disasters, cyberattacks, pandemics, power outages, civil unrest, and supply chain disruptions. Kyndryl follows industry-leading practices and has made significant investments in methodologies, tools, and governance frameworks to uphold continuity across its global operations.

This paper provides an overview of the Business Continuity measures implemented across Kyndryl, highlighting the strategies used to prevent, mitigate, and recover from potential threats to business operations.

Business Continuity Management and Governance

Kyndryl has a centralized Business Continuity Management System (BCMS) that provides a consistent framework, model, enablement, and guidance to its Business Areas while overseeing the overall Business Continuity Management (BCM) program. Corporate standards and guidelines establish the framework, while Kyndryl's business practices enact directives to ensure operational continuity, during natural or human-caused disruptions. The Framework aligns with the ISO 22301 standard and includes guidelines for developing response strategies to potential Business Continuity risks, documenting plans, conducting testing and maintenance activities, and understanding roles and responsibilities.

An Enterprise Business Continuity Management group governs and disseminates these planning guidelines throughout Kyndryl and regularly communicates with senior management about Business Continuity preparedness. This ensures general education and awareness among Kyndryl employees.

Business Continuity Planning

Each Kyndryl Business Area is responsible for developing and executing its Business Continuity Plans and mitigation strategies. Kyndryl assesses a broad range of risks that could impact service delivery, company reputation, stakeholders, or personnel. When a business operation or process is considered critical, a Business Continuity Plan becomes essential. These operations are crucial to the company's success, as well as to its partners and customers. They are typically identified based on their financial importance, internal and external risk factors, and the operational impact if disrupted. An array of IT applications and infrastructure operate in support of these critical processes. It is not uncommon to find multiple IT applications supporting a single critical process. IT applications are assigned to a criticality ranking based on an internal weighted review of several aspects including (but not limited to):

- Government or regulatory requirements
- Contractual obligations
- Service Level Agreements
- Employee support and safety

Critical IT applications are required to establish an IT data backup and Disaster Recovery strategy that fits the operational profile and designated significance of the business process.



The CIO strategy prioritizes SaaS platforms and Hyperscalers and takes a modern operational approach, with multi-region deployment architecture and parallel processing as the standard for Kyndryl's CIO application portfolio rather than legacy on-premises solutions and off-site data retention. Kyndryl systems achieve Recovery Time Objectives (RTO) through the use of stable, industry-proven solutions.

An additional element of the program is the Crisis Management Team (CMT). The CMT is established at the corporate level and in each country where Kyndryl delivers services. Crisis Management Teams, led by location leaders and composed of senior leaders from each business area at their location, will assemble for emergencies and work collaboratively to reduce the impact of a potential threat, protect people and property, and maintain or restore business activities. Crisis Management Teams test their response programs at least annually.

Maintenance and Testing

Kyndryl's Enterprise Business Continuity program mandates that Business Continuity Plans be regularly tested and improved as necessary. Business Areas are required to test and maintain their plans at least once annually, both at the location and business area levels. An Enterprise Business Continuity Management leadership team provides training for key personnel and makes educational materials available to all Kyndryl employees worldwide.



Frequently Asked Questions (FAQs)

General Business Resiliency

Does Kyndryl have a Business Continuity program?

Yes, Kyndryl has an established BCM program encompassing the overall strategy and framework for Kyndryl's Business Continuity management. The program includes the establishment, governance, and review of Business Continuity requirements based on impact and risk. It includes policies, procedures, and governance structures that guide the development, implementation, and maintenance of Business Continuity Plans and focuses on continuous improvement, training, and awareness to ensure organizational resilience.

What's Kyndryl's Business Continuity strategy?

Kyndryl's Business Continuity strategy, led by the Enterprise Business Continuity Management (EBCM) team and supported by business and technical representatives across its business areas, focuses on ensuring resilience and reliability throughout the organization. The strategy prioritizes critical processes, infrastructure, and applications through business impact analyses and risk assessments, with each business area responsible for maintaining and regularly testing its own continuity plan. Each critical process and application have a Business Continuity Plan detailing how to restore operations. The strategy mandates regular reviews and updates of these plans, with testing and maintenance conducted at least annually.

Does Kyndryl have a formal governance body for Business Continuity?

Yes, Kyndryl's Business Continuity governance is led by the dedicated Enterprise Business Continuity Management Team, which is supported by the leadership team composed of business and technical representatives from Kyndryl's business area. The governance team also collaborates closely with the Corporate Security and Crisis Management Team, as well as the Chief Information Officer. One of the responsibilities of the Enterprise BCM team is cross-functional governance, which helps ensure corporate-wide adherence to the Kyndryl BCM strategy. Business Continuity is included as a risk in Kyndryl's **Enterprise Risk Management (ERM)** system, as per the ERM standard requirements for Risk Management.

Does Kyndryl have a team focused on Business Continuity and Disaster Recovery?

Yes, Kyndryl has an Enterprise Business Continuity Management (EBCM) function which serves as a Business Continuity Management Partner for Kyndryl's Business Areas on their journey to be Business Continuity ready while building, modernizing, and integrating services for mission-critical workloads. The Function provides a consistent framework, model, enablement, and guidance to the guild which has Kyndryl's Business Areas and has oversight of the overall BCM program. The Guild/BCM leadership team consists of professionals from various areas within Kyndryl, including Business Continuity, Disaster Recovery, Risk Management, Cyber and Network Security, and Incident and Crisis Management.

Additionally, Kyndryl leverages expertise from Kyndryl Security and Resiliency Services, a globally recognized Business Continuity, Disaster Recovery, Cyber Security, and Recovery leader, which provides Business Continuity consultation and services to Kyndryl's customers. Get more details about Managed Continuity and Recovery Services, Disaster Recovery as a Service (DRaaS), and Cyber Resilience Services: <https://www.kyndryl.com/us/en/services/cyber-resilience>

Has Kyndryl gained ISO 22301 certification or is there a timeframe for achieving it?

Kyndryl follows a Business Continuity Management (BCM) Framework aligned with globally recognized industry standards, including ISO 22301. Many sites in different regions have achieved ISO 22301 certification. However, Kyndryl does not have a formal global ISO 22301 certification. Information regarding certifications related to compliance and regulatory items (e.g., ITAR, PCI, HIPAA, ISO, etc.) and the list of groups or countries within Kyndryl that are ISO 22301 certified can be obtained upon request through a Kyndryl account representative. <https://www.kyndryl.com/in/en/compliance/certifications>



How does Kyndryl evaluate Business Continuity risk?

Kyndryl evaluates potential financial, operational, regulatory, and other risks, which are influenced by factors such as where(location) and how(manner)business is being done, as well as the nature of the offerings. Senior management is responsible for the assessment and management of Kyndryl's various risk exposures. Each business area is accountable for the BCM risk within its domain and must implement and follow the Enterprise-level Business Continuity Management System (BCMS) per global standards.

How does Kyndryl conduct a business impact analysis?

Kyndryl identifies and prioritizes critical processes across the business based on impact and risk, identifying the Maximum Acceptable Outage (MAO), and critical dependencies, such as stakeholders or interested parties, site, resources, IT, suppliers, non-IT services, and process interdependencies. Kyndryl takes a comprehensive approach to impact analysis that includes identifying interdependencies across organizational and geographical boundaries. Also, a horizontal end-to-end process view is examined, which may involve a supply chain consideration, to create an enterprise view of the critical interdependencies. This approach enables Kyndryl to gain a more robust and complete understanding of its business, facilitating a thorough examination of Business Continuity risks.

Business Continuity Plans

In the event of a disaster or significant disruption to critical business processes, does Kyndryl have documented plans for recovering critical business processes and IT?

Yes, Kyndryl's **Business Continuity Plans** are designed to restore essential business processes and functions, with priorities set based on business impact and risk assessments. Additionally, **IT Disaster Recovery Plans**, which direct the restoration of IT services and applications supporting these critical processes, are prioritized by their business criticality. Kyndryl ensures that the critical services have documented plans in place and are regularly tested to maintain readiness.

What type of scenarios or business interruptions does Kyndryl plan for?

Kyndryl prepares for various scenarios and business interruptions to support resilience and continuity. These include IT disruptions, workplace and workforce disruptions, cybersecurity incidents, regional and global events (Large-scale events that can affect multiple regions or the entire globe, such as geopolitical conflicts or widespread natural disasters), and supply chain disruptions. By planning for these scenarios, by preparing for these scenarios, Kyndryl aims to minimize downtime and ensure that critical business functions can continue operating smoothly.

In the event of a disaster or significant disruption, does Kyndryl have documented emergency plans?

Yes, Kyndryl maintains **Emergency Plans** that help with the preparation and appropriate reaction to external events that could disrupt business. On a global scale, the Kyndryl corporate Crisis Management Team (CMT) provides direction, coordination, resources, and policy guidance. Local or country CMTs are responsible for taking actions that help prevent personal injury, minimize property damage, and protect company assets. CMTs work with affected businesses to respond to a crisis and support their efforts to continue operations.

Has Kyndryl included any specific guidelines or measures for pandemic situations like COVID-19 in their Business Continuity Plans?

Yes, Kyndryl is well prepared for pandemic events. In the unlikely event that a significant percentage of Kyndryl's workforce is unable to perform their job functions due to such pandemic events, the Business Continuity Plan has provisions and specific strategies for maintaining core operations. Kyndryl monitors current conditions, and preparedness plans through official alerts and recommendations from trusted sources, such as the World Health Organization (WHO). **Kyndryl's Corporate Health and Safety** organization along with the **Crisis Management Team (CMT)** lead the efforts around handling pandemic situations and are closely interlocked with the Business Continuity Management team. Kyndryl inherits the experience and leadership of preparing for a potential influenza pandemic since 2005 when worldwide concerns about avian influenza surfaced. Business Continuity Plans include response strategies for such situations including, but not limited to, the onset of a health-related emergency or pandemic, loss of workplace due to government regulations during the pandemic, etc.

What is Kyndryl's process for reviewing and signing off on Business Continuity Plans?

Kyndryl's Business Continuity Plans undergo review and approval by the relevant line management of the respective business areas where the plans are implemented.

How often does Kyndryl update or review their Business Continuity Plans?

Kyndryl reviews and updates its Business Continuity Plans at least once a year. Additionally, if there are significant changes in business operations, the plans are updated promptly to ensure they remain effective and relevant.

Will Kyndryl provide customers with copies of their current Business Continuity Plans?

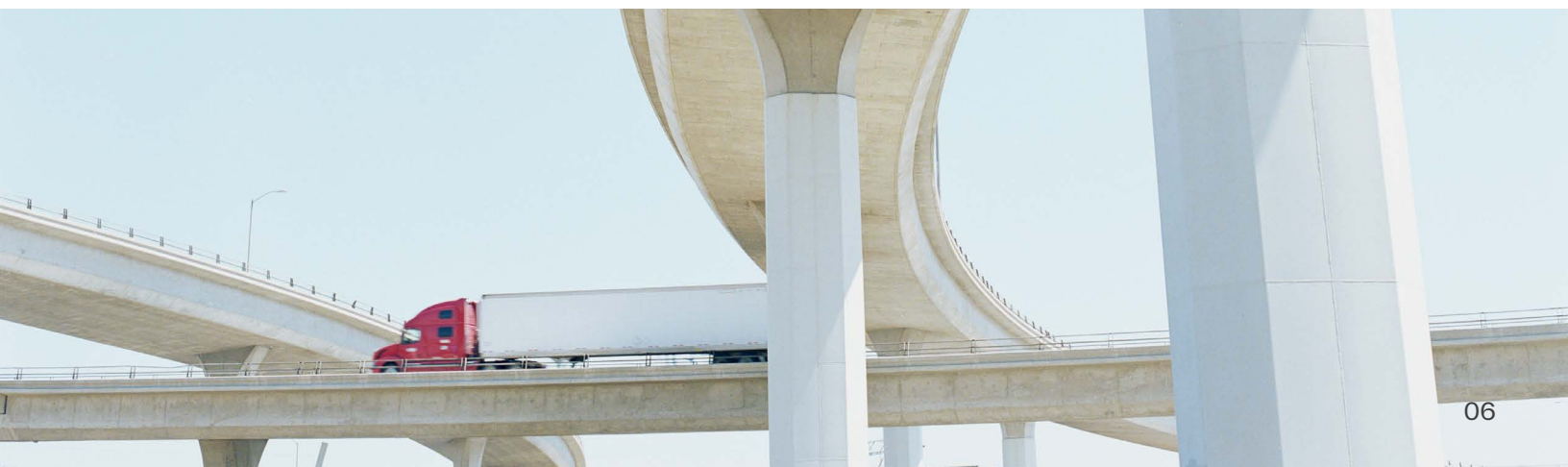
Kyndryl generally refrains from sharing complete copies of their Business Continuity Plans with customers, as these documents contain sensitive and proprietary information. However, they do share relevant details and summaries to assure customers of their preparedness and resilience strategies. If you have specific concerns or need more information, it might be helpful to contact Kyndryl directly for further clarification.

In the event of a disaster, does Kyndryl have Business Continuity Plans for services and solutions provided to customers that meet business recovery requirements?

Kyndryl has comprehensive Business Continuity Plans in place to recover services delivered to customers. These plans are designed to meet business recovery requirements by addressing various potential disruptions, including IT outages, natural disasters, and other significant events. Customers should work directly with their Kyndryl account representative to address specific Business Continuity and recovery needs, determining the appropriate mitigation or recovery actions for account-specific solutions or services. **Kyndryl's internal Business Continuity Plans are not a substitute for a customer service agreement or a client-owned business continuity plan.**

How are customers notified if a disaster at Kyndryl affects their contracted services?

In the event of a disaster impacting Kyndryl's services, customers are promptly informed. This usually involves direct contact with their Kyndryl account representative, who provides updates on the situation, the impact on services, and the measures being taken to mitigate the disruption.



Training, Testing, and Maintenance

What's Kyndryl's approach to Business Continuity testing?

Kyndryl ensures organizational readiness through a structured approach to Business Continuity training and testing. The Enterprise Business Continuity Management (EBCM) team provides training and awareness programs for key personnel, supported by educational materials accessible to all employees globally. Completion of this training is mandatory for all relevant employees to ensure consistent understanding and preparedness across the organization.

Kyndryl's approach to Business Continuity testing is comprehensive and robust which focuses on preparedness and resilience in response to various disruptions, from natural disasters to cybersecurity incidents. The testing process includes:

Exercising and Testing: Simulating realistic scenarios to identify weaknesses and improve plans. Methods range from tabletop, structured walk-through, simulation.

Continuous Improvement: Regularly reviewing and updating plans based on test outcomes to enhance resilience.

Comprehensive Coverage: Ensuring all critical aspects, such as IT systems, personnel, and facilities, are included in the testing process.

Business Continuity Plans are tested as part of the maintenance process by each of the business areas. Once these tests are complete, action plans are established to close any observed inadequacies.

Kyndryl regularly validates and recalibrates the plans to maintain readiness and resilience.

Do internal or external auditors review Kyndryl's Business Continuity and Disaster Recovery tests?

Yes, internal, and external auditors may review Business Continuity Plan **test results** as part of their annual audit and compliance activities depending on contractual obligations, government rules, regulatory compliance, the scope of the audit, or any other business factors.

How often does Kyndryl test the Business Continuity Plans?

Kyndryl regularly tests Business Continuity Plans to ensure they are effective and up to date. Business Continuity Plans are tested when they are first created and as part of annual update and maintenance cycles.

Kyndryl may perform more frequent tests in response to significant changes in the business environment, and regulatory requirements, or after real incidents to continuously improve its Business Continuity Plans.

Will Kyndryl share Business Continuity Plan test results or conduct joint tests with customers?

Kyndryl maintains strict confidentiality regarding its Business Continuity test results and does not disclose them to external parties unless mandated by a contractual obligation or statutory requirement. Additionally, Kyndryl does not engage in joint testing with customers.

How does Kyndryl understand proximity and impact on Kyndryl sites, Data centers, and employees located in a disaster area?

Kyndryl uses disaster monitoring and assessment platforms powered by AI, machine learning, and analytics, to assess possible impacts to Kyndryl offices, data centers, and employee locations.

These platforms, link to over 20,000 data sources including the Global Disaster Alerting Coordination System (GDACS), US National Weather Service (NWS), United States Geological Survey (USGS), trusted global news feeds, and other sources to assess potential emergencies and crises, whether man-made or naturally occurring.

How frequently are Business Continuity Plans (BCPs) reviewed and updated at Kyndryl, and how does the EBCM team ensure compliance and continuous improvement through performance monitoring?

Maintenance and Review: BCPs are reviewed and updated annually or upon significant business changes, such as shifts in risk profile, organizational structure, or regulatory requirements. The EBCM team monitors performance and risk indicators, and test results are logged in a central repository for review and continuous improvement.



What kind of training and awareness efforts are in place for employees?

Business Continuity Training and Awareness at Kyndryl:

Kyndryl places a strong emphasis on Business Continuity training and awareness for its employees.

- 1. Training for Key Personnel:** The training is also available through educational and awareness materials that are made available to all employees through internal communications and education.
- 2. Global Community and Best Practices:** The Enterprise BCM team hosts a global community that shares expertise and best practices with Kyndryl employees and Business Continuity teams across Kyndryl.
- 3. Business Continuity Awareness Week (BCAW):**
As part of the Business Continuity Institute's annual global conference, Kyndryl conducts an internal BCAW to enhance capabilities and increase readiness for critical situations. The virtual Kyndryl BCAW conference utilizes Kyndryl's social offerings and internal collaboration tools, blogs, wikis, and formal educational systems to conduct multiple educational lectures and deep-dive sessions.
- 4. Promoting Kyndryl-wide Business Continuity Awareness:**
Business Continuity is included in Kyndryl's Code of Conduct training. By promoting Business Continuity awareness among all employees and leveraging the expertise of BC practitioners, Kyndryl enhances its ability to support internal operations and customers.
- 5. Regular Training Programs:** Employees complete regular training sessions to stay updated on Business Continuity practices and procedures, ensuring they are well-prepared to handle disruptions effectively.
- 6. Testing/Exercises:** Training for key Business Continuity personnel is conducted through periodic testing performed at least once annually to ensure readiness. These activities help employees practice their response to various scenarios, enhancing their preparedness for real incidents.
- 7. Continuous Improvement:** Feedback from training sessions and testing is used to continuously improve the Business Continuity Plans and training programs. This iterative process helps in addressing any gaps and ensuring the effectiveness of the continuity efforts.

Recovery Strategy

Does Kyndryl have specific workplace recovery locations for critical sites?

Yes, Kyndryl being the world's largest IT infrastructure services provider and serving thousands of enterprise customers in more than 60 countries, our plans provide flexible relocation strategies and are not dependent on a single site. Kyndryl when selecting workplace recovery locations for critical sites, considers several key factors to ensure Business Continuity such as Proximity and Accessibility, Infrastructure and Facilities to support critical business functions, Security and Compliance so the site meets security standards to protect sensitive data and comply with industry regulations.

Does Kyndryl's Business Continuity Plans cover sites that deliver services and solutions to customers?

Yes, Kyndryl Business Continuity Plans cover all critical processes, including customer support for Kyndryl worldwide support operations using a geographically dispersed model, a diverse workforce, and global ticket routing to available centers and operators. This approach helps accommodate fluctuations in demand, including unplanned events, which could potentially interrupt business at one or more sites.

Third-party Suppliers

Does Kyndryl assess the Business Continuity preparedness of their strategic suppliers?

Yes, Kyndryl does assess the Business Continuity preparedness of its strategic suppliers through a structured approach. Kyndryl's Global Procurement has a **Supplier Business Continuity Assessment Program** that focuses on supplier readiness and effective execution to ensure the continuity of Kyndryl's services, solutions, internal operations, and customer support. This approach allows Kyndryl to assess a supplier's ability to maintain a robust Business Continuity Plan and execute Business Continuity testing procedures.

What does the Kyndryl Supplier Risk Management program cover?

Kyndryl has implemented a supplier risk management program to mitigate risks associated with suppliers. The program covers cybersecurity events, pandemics, natural disasters, resource constraints, and other challenges that may mean our suppliers cannot meet their contractual obligations to us and our customers.

Supplier Risk Management includes but is not limited to supplier financial assessment, information security assessment, social and environmental assessment, business continuity assessment, and compliance checks with Import/Export – and foreign anti-corruption regulations.



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