# Risk Committee report



Richard Dakin Chair of the Risk Committee

### 2021 Focus areas

- Continue to monitor the Group's principal and emerging risks
- Ensure health and safety risks are being effectively managed across the Group (see page 54)
- Review results of a climate change risk analysis performed by Willis Towers Watson (see page 49)
- Assess and manage the risks arising from the UK leaving the European Union
- Continue to monitor the management of Covid-19-related risks in respect to its impact on London, our business, occupiers and supply chain
- Review the risks arising at our key developments:
   The Featherstone Building EC1 and Soho Place W1

#### Dear Shareholder,

I am pleased to present our Risk Committee report for 2020 which describes our activities and areas of focus during the year.

#### Risk profile of the Group

Since the signing of our 2019 Annual Report, Covid-19 was declared a pandemic and has caused significant societal and economic disruption, leading to the Group's overall risk profile being elevated. The restrictions introduced to limit the spread of the virus has had a significant impact on the UK (and global) economy and has accelerated existing office trends.

Due to the Group's proactive response to the pandemic and its strong financial position, the initial risks arising from Covid-19 have been carefully managed. This was confirmed via an independent review of Derwent London's response to Covid-19, performed by the Group's internal audit provider, RSM (see page 136).

Despite the elevated risk profile, the Group has demonstrated its resilience and values: relationships with key stakeholders have been enhanced and support offered where required most. Looking ahead, the Committee will continue to assess and monitor the risks arising from the pandemic, and the implications of Brexit, in the short, medium and long-term.

#### Key activities of the Committee during 2020

A significant proportion of the Committee's time this year was spent on overseeing the management of risks arising from the Covid-19 pandemic and the identification of emerging risks within the context of the Group's changing risk profile.

During 2020, additional meetings were arranged for the Board and Risk Committee in March. The additional meetings enabled the Committee to satisfy itself that risks were being proactively identified and managed, and to provide assurance to the Board that the risk management framework was operating effectively.

I would like to thank the executive team and management for their diligence in quickly identifying arising and emerging risks so that sufficient mitigation could be implemented. The Committee was pleased with how management and our risk management systems responded as the pandemic developed.

In addition to reviewing the Group's risk register and Covid-19 risk management procedures, the Committee's main areas of focus during 2020 related to health and safety, Brexit contingency planning, development-related risks and cyber security. Further information on how the Committee and the Group responded to the cyber security risks arising from Covid-19 and home working is provided on page 144 of this report.

#### Further engagement

The forthcoming AGM is on 14 May 2021 and I will be available to answer any questions on the Committee's activities that you may have. If you wish to contact me, I am available via our Company Secretary, David Lawler (telephone: +44 (0)20 7659 3000 or email: company.secretary@derwentlondon.com)

#### **Richard Dakin**

Chair of the Risk Committee 10 March 2021

#### Committee composition

The Committee's membership for the year under review is detailed in the table below. In addition to the Committee members, the Board Chairman, other Directors, senior management and the internal or external Auditors, may be invited to attend all or part of any meeting as and when appropriate and necessary.

		Number	
	Independent	of meetings	Attendance
Richard Dakin, Chair	Yes	4	100%
Dame Cilla Snowball	Yes	4	100%
Lucinda Bell	Yes	4	100%

The Committee's role and responsibilities are set out in the terms of reference, which were last updated in November 2020, and are available on the Company's website at: www.derwentlondon.com/investors/governance/board-committees

#### **Meetings of the Committee**

During the year under review, the Risk Committee met four times, in March, May, August and November (2019: three meetings).

The Committee arranged an additional meeting in March to provide guidance and risk management oversight as the Covid-19 pandemic developed. The meetings in August and November included a joint session with the Audit Committee to review the outcome of the internal auditor's reviews (further information on page 136).

#### Committee performance evaluation

The 2020 evaluation of the Board, its committees and individual Directors was internally facilitated by Simon Fraser, the Senior Independent Director, in accordance with our three-year cycle of evaluations (see page 121). There were no significant matters raised.

#### Risk management

At Derwent London, the management of risk is treated as a critical and core aspect of our business activities. Although the Board has ultimate responsibility for ensuring the Group has robust risk identification and management procedures in place, certain risk management activities are delegated to the level that is most capable of overseeing and managing the risks (see chart 1).

In order to gain a comprehensive understanding of the risks facing the business and the management thereof, the Risk Committee periodically receives presentations from senior managers and external advisers.

A robust assessment of the principal risks facing the Group is regularly performed by the Directors, which takes into account the risks that could threaten our business model, future performance, solvency or liquidity, as well as the Group's strategic objectives over the coming 12 months. Our principal risks are documented in a schedule which includes a comprehensive overview of the key controls in place to mitigate the risk and the potential impact on our strategic objectives, KPIs and business model. Due to its importance, changes to the Schedule of Principal Risks can only be made with approval from the Risk Committee or Board (changes to the principal risks during the year under review are on page 85).

Risks not deemed to be principal to the Group are documented within the Group's risk register which is maintained by the Executive Committee. The Board reviews and approves the Group's risk register on an annual basis and it is reviewed by the Risk Committee at each of its meetings. In addition, risks deemed to be key indicators of changes in the Group's risk profile, or deviation from the Board's risk tolerance, are singled out and reported upon at each Risk Committee meeting.

During the annual strategic review and approval of the five-year plan, the Board assesses the emerging risks, being those that could impact on the business in the medium to long-term (see page 87). Emerging risks are identified through roundtable discussions and horizon scanning. Emerging risks are discussed by the Committee at each meeting and are included within the 'on watch' section of the Group risk register.

Following the Risk Committee's reviews, the Committee confirmed to the Board that it is satisfied that the Group's internal control and risk management procedures:

- operated effectively throughout the period; and
- are in accordance with the guidance contained within the FRC's Guidance on Risk Management, Internal Control and Related Financial and Business Reporting.

#### Chart 1: Our risk management structure

#### Board

- Overall responsibility for risk management and internal control
- · Sets strategic objectives and risk appetite
- Sets delegation of authority limits for senior management

#### **Risk Committee**

- Monitors and reviews the Group's risk register
- Identifies and evaluates key risks (principal and emerging), ensuring they are appropriately managed
- Works alongside the Board to set the risk tolerance levels for the Group

#### **Audit Committee**

- Monitors assurance and internal financial control arrangements
- Manages the external audit process and reviews the Auditors' reports

#### **Executive Committee**

- Maintains the Group's risk register
- Manages the Group's risk management procedures
- Reviews the operation and effectiveness of key controls
- Provides guidance and advice to staff on risk identification and mitigation plans

#### Senior management

- Engages with the Executive Committee to identify risks
- Allocated risk managers and oversee their risk response

# Risk Committee report continued

### Risk management framework

#### Identify **Monitor** Respond Assess Top down Risk owner assigned and Introduce controls and Detailed assessment by Board considers the Executive Committee Executive Committee and procedures to reduce risk future scenarios and Risk Committee conduct exposure and understand Emerging risks are identifies principal monitoring exercises how risks relate and kept under review and and emerging risks reassessed annually impact upon each other Bottom up Risks identified through workshop debates

#### How do we identify risks?

- Top down approach to identify the principal risks that could threaten the delivery of our strategy: at the Board's strategy reviews, scenarios for the future are considered which assist with the identification of principal and emerging risks and how they could impact on our strategy. The continuous review of strategy and our environment ensures that we do not become complacent and that we respond in a timely manner to any changes.
- Bottom up approach at a departmental and functional level: risks are identified through workshop debates between the Executive Committee and members of senior management, analysis, independent reviews and use of historical data and experience. Risk registers are maintained at a departmental/functional level to ensure detailed monitoring of risks. During 2020, the Digital Innovation & Technology (DIT) department maintained an additional risk register in respect to home working and Covid-19-related IT risks (see page 144). Risks contained on the departmental registers are fed into the main Group risk register depending on the individual risk probability and potential impact.
- Independent assurance: RSM, as the Group's independent internal auditors, perform reviews of the Group's departments and key activities which provide assurance to the Board and Committee that risks are being identified and effectively managed. In addition, these reviews highlight any recommendations for further action.

#### How do we assess risk?

Following the identification of a potential risk, the Executive Committee undertakes a detailed assessment process to:

- gain sufficient understanding of the risk to allow an effective and efficient mitigation strategy to be determined;
- · allow the root cause of the risk to be identified;
- estimate the probability of the risk occurring and the potential quantitative and qualitative impacts; and
- understand the Group's current exposure to the risk and the 'target risk profile' (in accordance with the Board's risk appetite) which will be achieved following the completion of mitigation plans.

Where necessary, external assistance is sought to assess potential risks and advise on mitigation strategies. Emerging risks are kept under review via the 'on watch' register and reassessed during the annual strategy reviews.

#### How do we monitor risks?

Once a risk has been identified and assessed, a risk owner is assigned who is considered to be in the best position to influence and monitor the outcome of the risk. As part of our risk management procedures, the Executive Committee and Risk Committee routinely conduct monitoring exercises to ensure that risk management activities are being consistently applied across the Group, that they remain sufficiently robust and to identify any weaknesses or enhancements which could be made to the procedures.

Monitoring activities include:

- the regular review and updating of the Schedule of Principal Risks, the Group's risk register and 'on watch' register;
- independent third party reviews of the risk management process to provide further assurance of its effectiveness;
- alerting the Board to new emerging risks and changes to existing risks;
- monitoring how the risk profile is changing for the Group; and
- providing assurance that risks are being managed effectively and where any assurance gaps exist, identifiable action plans are being implemented.

#### How do we respond to risk?

We implement controls and procedures in response to identified risks with the aim of reducing our risk exposure, so that it is aligned or below our risk appetite. The successful management of risk cannot be done in isolation without understanding how risks relate and impact upon each other. At Derwent London, we consider the interconnectivity between risks which allows us to prioritise areas that require increased oversight and remedial action. The mitigation plans in place for our principal risks are described in greater detail on pages 88 to 99.

#### Insurance

We use insurance to transfer risks which we cannot fully mitigate. Our comprehensive insurance programme covers all of our assets and insurable risks. We are advised by our insurance brokers, Marsh, who report to the Risk Committee on an annual basis. We have a long-standing relationship with our insurers, RSA, who perform regular reviews of our properties that aim to identify risk improvement areas.

During 2020, the insurance market hardened with insurers reducing the amount of capacity they are willing to allocate to any one risk. This resulted in an overall capacity contraction, conservative underwriting and a significant rise in premiums. The largest insurance risk for Derwent London relates to construction and Directors' & Officers' insurance as both current policies expire in 2021 and we are expecting to see premiums increase due to current market conditions.

In respect to Property Owners insurance, we were pleased to arrange a new Long Term Agreement in March 2020, which means that both Derwent London, and our occupiers, will not suffer any significant premium increases during 2021.

#### **Compliance training**

Since May 2019, the Risk Committee has operated a training programme which provides refresher training on a range of risk and compliance topics (including anti-bribery and corruption, data protection and modern slavery) to all employees and members of the Board.

At the launch of each training topic, an introductory email is sent to participants advising them of why the training is important and links to further information (including Company policies and guidance notes). The training is accessed via an online portal and each topic takes approximately 30 to 60 minutes to complete.

The topics covered during 2020 included:

- anti-money laundering;
- competition law;
- · fraud awareness; and
- · cyber security.

The Committee were pleased with the level of engagement from employees for the new compliance programme with on average 95% of all participants (inclusive of the Board) completing each training module.



Board training in 2020

#### Risk tolerance

Like any business, we face a number of risks and uncertainties. An overview of the Group's risk profile is available on pages 84 to 99. The Group's risk tolerance is set by the Board and is the level of risk we are willing to accept to achieve our strategic objectives. During 2020, the Board added climate change resilience to its Risk Appetite Statement and set its risk tolerance as low.

Our overall risk tolerance is low and is contained in our Risk Appetite Statement (see the table below for an overview of this statement). This tolerance, alongside our culture, informs how our staff respond to risk. Due to our open and collaborative working style, any potential problem, risk or issue is identified quickly so appropriate action can be taken.

Category	Risk tolerance		
Operational	Operational risks include health and safety risks, continuity of the IT system	Health and safety	Zero
	and retention of the senior management team.	IT continuity	Low
		Staff retention	Medium
		Climate change resilience	Low
		Other operational risks	Medium
Financial	Other than market-driven movements that are beyond the Group's immediate	REIT status	Low
	control, the Group will not generally accept risks where it is probable that:	Credit rating	Low
	<ul> <li>Asset values decline by more than £100m from the Group's annual budget.</li> <li>EPRA profit before tax deviates by more than £5m from the Group's annual budget.</li> <li>Cost overruns occur on capital projects of more than 5% of the approved capex budget.</li> </ul>	Decrease in asset value (>£100m)	Medium
		Profits (£5m)	Medium
		Cost overruns (>5%)	Medium
		Interest cover (<20%)	Medium
	<ul> <li>The Group's interest cover ratio will fall to within 20% of the level set in the Group's borrowing covenants.</li> </ul>		
	It is recognised that inherent market risk may result in these financial tolerances, in particular the assets limit, being exceeded. The Board accepts this market risk but seeks to manage and mitigate its impact where possible.		
Reputational	The Group has a low tolerance for risk in connection with reputational risk. In particular, this level of risk tolerance relates to any action that could adversely affect the Derwent London brand.	Brand value	Low
Regulatory	The Group's tolerance for regulatory risk arising from statute or the UK	Statutory	Zero
	Corporate Governance Code and from adherence to 'best practice' guides.	Governance	Low

Zero:	The Board has a zero tolerance to risk-taking
Low:	The Board is not willing to take any significant risks
Medium:	The Board is willing to take measured risks if they are identified, assessed and controlled
High:	The Board is willing to take significant risks

# Risk Committee report continued

#### **Development risks**

The Risk Committee's role is to gain assurance that risks are being identified, effectively managed and where possible mitigated. At each meeting during 2020, the Risk Committee met with the Director of Development, Richard Baldwin, and members of the Development team to discuss the Group's largest development projects and the management of risks.

We have classified three development-related risks as principal to the Group – reduced development returns, 'on-site' risk and contractor/subcontractor default – these are discussed in further detail on pages 92 and 93.



#### **Brexit**

The Committee's responsibility during 2020 was to ensure that management was proactively planning for the risks and challenges which could arise from the Brexit transition negotiations and the eventual outcome.

At each annual strategic review since the referendum decision, the Board as a whole considered potential Brexit scenarios on the Group's five-year strategic plan and long-term viability.

In 2021, the Committee will continue to monitor international trade negotiations, including the UK application to join the Comprehensive and Progressive Trans-Pacific Partnership (CPTPP) and the agreement of terms with the EU in respect of the financial services sector (see pages 88 and 89).



#### Anti-bribery and corruption

We are committed to the highest standards of ethical conduct and integrity in our business practices and adopt a zero-tolerance approach to bribery and corruption. An overview of our policies and procedures in this area is contained in the table below.

Test	Purpose	
Corporate hospitality	Hospitality must be reasonable in value, appropriate to the occasion and provided openly and transparently. It must not compromise, nor appear to compromise, the Group nor the business judgement of our staff.	
Business gifts	Generally, gifts should not be accepted unless valued less than £50, are not cash or a cash equivalent (e.g. gift certificate), are appropriate to the circumstances and are not given with the intention of compromising or influencing the party to whom it is being given.	
Hospitality and Gift Returns	All staff are required to complete quarterly Hospitality and Gift Returns which document all instances of third- party hospitality or gifts (given or received) over that three-month period if the value is in excess of £50 for hospitality and £10 for gifts. The Hospitality and Gift Returns are subject to review by the Risk Committee.	
Political donations	The Company strictly prohibits any political donations being made on its behalf.	
Charitable donations	Charitable donations are handled by the Sponsorships and Donations Committee. 'Know your client' procedures are applied to charitable organisations to ensure we are dealing with a valid body acting in good faith and with charitable objectives.	
Contractors and suppliers	Our zero-tolerance approach is communicated to all suppliers, contractors and business partners. Due diligence procedures determine if a third party has previous convictions under the Bribery Act. All contracts with suppliers or contractors prohibit the payment of bribes or engaging in any corrupt practice. The Company has the right to terminate agreements in the event a bribe is paid or other corrupt practice undertaken.	
Supply Chain Sustainability Standard	Contains the minimum standards we expect from our major suppliers (further information on page 148).	
Payments	All payments made must be warranted, transparent and proper. All payments must be accurately recorded through the normal accounting and financial procedures without any deception or disguise as to the recipient's identity or the purpose of the payment in question. No one approves their own expense claim. All expense claims must be approved by a Director or senior manager.	
Facilitation payments	Facilitation payments are bribes and are strictly prohibited.	
Conflicts of interest	All conflicts of interest or potential conflicts of interest must be notified to the Company Secretary and a register of such notifications is maintained. The Corporate governance statement on page 119 explains our process for managing potential conflicts.	
Training	We provide our employees with guidance notes and regular training on anti-bribery, corruption, ethical standards and the prevention of the facilitation of tax evasion.	
Whistleblowing procedures	A confidential helpline is available for staff to report concerns anonymously. Further information on page 116.	

#### **Credit Committee**

The Credit Committee is a supporting committee within the Group's governance framework which typically meets on a weekly basis to assess and monitor the financial strength of potential and existing tenants. The Credit Committee is chaired by the CEO and its members include David Silverman (Executive Director) and senior members of the Finance, Leasing, Property and Asset Management teams.

During 2020, due to the difficulties being faced by our current and prospective tenants, the Credit Committee met on a more frequent basis and the meetings were additionally attended by our CFO, Damian Wisniewski. The 'tenants at risk' register was regularly reviewed to carefully monitor the financial performance of existing tenants. As at 31 December 2020, the 57 tenants included on the 'tenants at risk' register represented 8% of the Group's contracted net rental income, and mainly consists of businesses operating in retail and hospitality sectors.

The Credit Committee's remit of responsibilities includes the assessment of:

- lettings to new tenants;
- · additional space for existing tenants;
- renewals/regears;
- rent concessions:
- an existing tenant moving within the portfolio; and
- · assignments/subleases.

We are aware that during times of heightened uncertainty, receiving a swift response to queries is important. The Credit Committee delegated authority to the Asset Management team and Head of Asset Management to quickly help and assist our smaller occupiers during the Covid-19 lockdowns in respect to rent concessions.

The Risk Committee and Audit Committee were updated on the work of the Credit Committee during the year under review, to ensure it was in agreement with the accounting principles being applied and the management of risk. The Risk Committee confirms that it is satisfied with the extensive due diligence process being undertaken by the Credit Committee.

#### Health and safety

Due to the Covid-19 pandemic and the restrictions imposed during the year, the Health and Safety team was required to adjust how it operates to meet our business health and safety needs. The Group's primary concern was the health, safety and wellbeing of our people, tenants, residents, contractors and the public (see pages 54 and 55).

At each Committee meeting, a detailed update is provided on health and safety matters on both the managed portfolio and the development pipeline. During 2020, the Committee were kept apprised of the following:

- the development of the 'return to the office' plan and procedures for employees and occupiers returning to our buildings following the easing of lockdown restrictions;
- the Fire Safety Bill and Building Safety Bill and Derwent London's compliance;
- the latest operating procedures for development sites; and
- · induction and health and safety training.



### Covid-19: protecting our occupiers

in our buildings was a priority as our tenants returned to their office spaces following the first lockdown. To ensure their health and safety we implemented the following measures:

- with clear signage
- Readily available hand sanitiser units

- Enhanced cleaning regimes and upon notification of a confirmed case, an electrostatic clean was undertaken automatically
   Temperature checks on entry on agreement with occupiers
   Encouraging the use of face masks within the common areas

- Random Covid-19 testing of our air-conditioning filters

Covid-19 throughout our managed portfolio. As at 31 December 2020, there had been a total of 76 confirmed cases from our occupiers, with unfortunately one death reported. There have been 17 confirmed cases to date for Derwent London employees (Building Managers, Security Officers or Reception teams) across the managed portfolio. Of the total 93 cases,

The data of confirmed cases clearly showed that, where there were several incidents, these were concentrated to a tenant's area and not more widely spread throughout the building. This provided our occupiers, and the Board, with comfort that our measures were proving effective in minimising the spread

their changing occupancy plans and adapt our building specific plans in response. In addition, to support our occupiers, we have stopped non-essential services as far as possible and for March and June quarters we reduced our service charges by 25%.



## Risk Committee report continued

#### Cyber security

Our cyber security procedures have been strengthened considerably in recent years in response to the increasing threat this poses to businesses, and it remains an area that we keep under continuous review.

The Committee reviews a dashboard of key risk indicators at each meeting which includes information security and cyber risk-related KPIs. During 2020, there were 109,735 (2019: 201,532) attempted attacks on our systems, none of which resulted in a serious security breach and 99.96% (2019: 99.98%) of the attempts were stopped before they reached the intended targets – this highlights the robustness of our cyber security posture.

Due to the Covid-19 pandemic and the change in the way we were required to work during the lockdown restrictions, a Home Working & Covid-19 Cyber Risk Register was produced which identified the key IT risks arising and the additional controls put into place for risk mitigation. The Risk Committee reviewed this register at each meeting during 2020 and received regular updates on the implementation and effectiveness of the additional controls, which included:

- Multi-Factor Authentication (MFA) on all Office 365 accounts;
- additional employee awareness training and guidance on remote working security; and
- ensured that all business-critical IT systems, such as financial packages, are securely accessible remotely.

Our Digital Innovation & Technology (DIT) team tested the effectiveness of our ongoing security awareness programme in 2020 by sending fake phishing emails to staff in May and monitoring their response. Any staff member who clicked on the links contained in the test emails, or entered their credentials was provided with further training on the dangers and tips on how to identify phishing emails.

All staff participate in mandatory information security workshops each year which focus on our policies and procedures, cyber and personal security. Our Group intranet also includes a 'tips and tricks' section for our staff with guidance on issues such as cyber security, social media and general security awareness. During 2021, all employees and Directors will complete social media awareness and IT security training as part of our compliance training programme (see page 141).

During 2020, we requested that Capgemini conduct a Cyber Risk Review. Capgemini utilised the Information Security Forum (ISF) benchmark tool combined with a 427 question Security Health-check Questionnaire to review our security control environment. Derwent London's cyber risk landscape was classified as low to medium based on our current operations, however, it was noted that this is trending upwards as we develop our Intelligent Building and Digital strategies.

In November, the Committee reviewed the outcome of the audit and were pleased that Capgemini had noted the improvements made since the prior audit in 2018 and that this was reflected in the overall improvement in benchmarking scores. The Committee agreed the responses and timeframes for implementing the audit recommendations. Management will be required to provide the Committee with a status update on the implementation of the recommendations during 2021.

#### Cyber Essentials accreditation

As part of our ongoing commitment to cyber security, on 3 April 2020 our Cyber Essentials accreditation was renewed, having passed an external security scan of all internet-facing services and an assessment of technical and operational controls. Cyber Essentials is a government-backed, industry-supported scheme which helps guard against the most common cyber threats and demonstrates to stakeholders our commitment to cyber security.

On 22 October 2020, the Group's Information Security Manager was awarded the CISM (Certified Information Security Manager) qualification by ISACA (Information Systems Audit and Control Association). CISM is a globally accepted and recognised standard of achievement among information security professionals that is aimed at improving alignment between information security programmes and broader business objectives.



#### Information security

To safeguard the security and privacy of information entrusted to us, we have robust procedures and a layered defence model in place.

This ensures that we:

- maintain the confidentiality, integrity and availability of data and safeguard the privacy of our customers and employees, to ensure that the business retains their trust and confidence;
- protect the Group's intellectual property rights, financial interests and competitive edge;
- · maintain our reputation and brand value; and
- comply with applicable legal and regulatory requirements.

During 2021, all employees will undertake refresher training on protecting personal data.

#### Business continuity and disaster recovery

Due to the Covid-19 pandemic and lockdown restrictions in 2020, we were required to close our London office for several months. During this period, all staff received full pay (no furlough) and the vast majority were capable of working effectively remotely. To facilitate home working, additional systems and security controls were rapidly rolled out and employees were provided with secure devices to access their work files safely alongside remote IT support.

Capgemini, in its Cyber Risk Review report to the Risk Committee, commented that "The speed at which Derwent London was able to roll out these changes highlights the excellent Business Continuity capability that the organisation has developed and has helped it adapt extremely quickly with minimal disruption".

#### Disaster recovery procedures

Derwent London has formal procedures for use in the event of an emergency that disrupts our normal business operations which consist of:



The Covid-19 pandemic had a considerable impact on how our business operated, particularly during the lockdown restrictions, which required us to implement some aspects of our Business Continuity Plan. All our major systems have been tested whilst at home, including invoicing, arrears collection, payroll, document signing, supplier payments and half-year reporting. During the process we have learnt further lessons to strengthen our plans.

Although our DIT department performed technical tests to ensure our off-site disaster recovery suite is fully operational, our IT failover mechanism to the off-site suite has not been fully tested in 2020. Our priority for 2021 is to test the closure of IT systems at 25 Savile Row and their failover to the off-site disaster recovery suite. In addition, during 2021, our Business Continuity Plan will be subject to an independent review.

The last full business continuity test was performed in September 2018, which was staged as a complete loss of power at our head office building at 25 Savile Row. The test was overseen by independent verifiers, IT Governance Limited, who assessed our procedures and efficiency. The entire process from the loss of primary power, transfer to our disaster recovery suite and roll back to Savile Row took 6 hours and 45 minutes (a 3 hour and 20-minute improvement on our previous full test completed in October 2016).

#### Business continuity tests planned for 2021

Test	Purpose	Date
Business Continuity Plan review	The CMT team to meet regularly to review and update the business continuity plan and cascade list, review current threat levels and agree on any action points.	Ongoing during 2021
IT component test	A technical test of the individual components required to carry out a failover of IT services to our disaster recovery suite.	Q1 2021
Full IT disaster recovery test	A full IT systems failover from our offices to our disaster recovery suite and testing that all IT functions and business-related activities can be adequately performed.	Q2 2021
Desktop review	A desktop exercise which uses a series of scenarios to rehearse decision making and familiarise the CMT members with their roles.	H2 2021