



KOINZ (PTY) LTD BUSINESS CONTINUITY PLAN

KOINZ (PTY) LTD, Reg no. 2022/235484/07 **DIRECTORS: LOUISE FOURIE & MARK WEETMAN**
Address: Unit 1, Village Corner, 57 via Latina Crescent, Irene Corporate Corner, Irene, Gauteng, 0178
Postal Address: PO Box 61803, Pierre van Ryneveld, Centurion, Gauteng, 0045
Tel: 012 880 3790 Email: info@koinz.co.za Website: www.koinz.co.za



1. INTRODUCTION

Koinz has formulated this Policy aimed at ensuring, in the case of an interruption to Koinz's systems and procedures, that:

- any losses are limited;
- the preservation of essential data and functions;
- the maintenance of its regulated activities;
- or where that is not possible the timely recovery of such data and functions and the timely resumption of the activities.

This Policy shall formulate a Business continuity plan and Succession Plan to provide a solid framework which will in turn provide stability and security in times of crises.

This Policy must be read in conjunction with Koinz's Disaster Recovery Plan.

2. DEFINITIONS

"Business continuity" is defined as the capability of the organization to continue delivery of products and services at acceptable predefined levels following a disruptive event.

"Succession Planning" is defined as the process for identifying and developing internal people to fill key business leadership positions in the organisation should one or more office bearer become, unable to act as such, a suitably trained substitute can take the place of the one no longer able to do so. Succession Planning also refers to seamless transfer of clients, ownership and control arrangements should an organisation cease to exist or a change in management control of the organisation occurs.

3. OBJECTIVES

3.1. Koinz has adopted this Business Continuity Plan ("BCP") pursuant to the requirements of prevailing legislation and in the interests of its clients.

3.2. The purpose of this BCP is to define the strategies and plans that will be used by the Company during a Significant Business Disruption ("SBD"). An SBD includes any event or situation that significantly impacts the Company's ability to provide services to its clients.

This disruption can be as a result of internal or external factors within the organisation.

When a disruptive event occurs, it is not the time for contemplating what to do, it is in fact time for action!

This document attempts to summarise the impact and probability of various possible disruptions to the

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business activities of Koinz and design the necessary procedure and controls for continuity in each instance.

3.3. For Koinz business continuity is about:

- building and improving resilience within Koinz;
- about identifying Koinz's key products and services and the most urgent activities that underpin them; and
- formulation of plans and strategies that will enable Koinz to continue its business operations and enable it to recover quickly and effectively from any type of disruption whatever its impact or cause.

4. ACCESSIBILITY OF THE BUSINESS CONTINUITY PLAN.

Koinz's Business Continuity Plan is available under the Britrix Premise Folder under Koinz Policies and procedures which is accessible to every employee of Koinz or alternatively this Policy can be accessed via our external Compliance (Outsourced Compliance Services).

5. OFFICE LOCATION

Koinz Offices are located at unit 1 Via Latina Crescent, Pierre Van Raynveld. Our main telephone number is **+27128803790**. Alternatively we can be contacted via mail on PO Box 61803, Pierre Van Ryneveld, Centurion, Gauteng, 0045

6. BUSINESS CONTINUITY

This Policy is to make provision for at least the following disruptions:

- Temporary absence of the KI/CEO
- The event of the death/incapacity of a KI/CEO
- The event of termination of the business;
- Operational risks
- Technological Risk
- Financial Risk



7. Koinz has one KI;

Mark Howard Weetman who also occupies the role of the Chief Executive Officer (“CEO”) and is responsible for all aspects of Koinz’s operational and investment management process,

7.1. In the event of the CEO and or KI temporary absence (i.e. the expected absent period is to exceed 2 working days) due to illness, accident or vacation the following person will be responsible to ensure the orderly implementation and execution of the day to day running of the organisation :

Responsible Person: Louise Fourie, Head Operations & Strategy

Contact Number: +27 731510908

Email: louise@koinz.co.za

Assisted by Key Resources and Alternative Resources;

Priority	Key Resource	Alternative Resource
1	Linea Manjowo, Internal Compliance	James Weetman, Project Manager

7.2. All parties affected by the KI’s absence must be notified accordingly by the **Responsible person.**

7.3. During the absence of the KI, all support staff and authorised representatives will continue performing the necessary administrative tasks performed during the normal day-to-day operations of the FSP.



- 7.4. The KI (prior to departure) to ensure an “out of office” reply has been set up on the KI’s email account explaining the KI’s absence, expected date of return as well as alternative contact numbers.
- 7.5. Where the KI will be in an area without mobile phone coverage, the KI is to ensure that they:
- 7.5.1. check their voicemail boxes daily,
 - 7.5.2. provide an alternative method to enable key administrative staff to be able to contact him or her during a client or other emergency.
- 7.6. The Key Individual (prior to departure) to ensure that an automated voicemail has been set up on the Key Individual’s telephone account explaining the Key Individual’s absence, expected date of return as well as alternative contact numbers. **Key individual to ensure that Phone PIN is stored safely or encrypted**
- 7.7. Where the Key Individual is travelling internationally, the key individual is to ensure that International Roaming has been activated on their mobile phone contract and that the key individual is contactable

8. SUCCESSION PLANNING

- 8.1. The purpose of this Succession Plan is to provide for the emergency of an indisposed KI that may no longer be able to act in his or her capacity as KI, due to death or an event that has led to the KI’s permanent incapacity.
- 8.2. In the event of any of the FSP’s KIs death or permanent incapacity, the Responsible Person mentioned in 7.2. above will be responsible to ensure the orderly implementation and execution of the day to day running of the organisation until the shareholders of the organisation identify a suitable replacement.
- 8.3. In a situation where no suitable replacement can be found and winding down the business remains the only option, then the normal cessation of business in terms of the FAIS Act and Code of Conduct processes will be followed.
- 8.4. In the event of any of the FSP’s KIs death clients must be notified of the changes that would take place via email or by telephone.



8.5. Product suppliers shall also be contacted

8.6. External Compliance (Outsourced Compliance Services) shall notify the registrar (FSCA)by email.

9. TECHNOLOGICAL RISK

Examples of technological risk are hardware failure, software failure, Network Interruption and utility interruption or failure.

Virus, Encryption of emails and Firewall protection are in place. Monthly periodic reports are done for audit logs.

Backup media stored in a secure place isolated from environmental hazards.

10. OPERATIONAL RISK

In the event of a disaster Koinz will identify means to communicate with its clients employees and the regulator and institutions holding client funds, key activities shall be retrieved by means of data backup.

In the event that the server has been destroyed Koinz has to purchase new server within a space period of 2 days.

In the event of a fire, the server is stored behind a Fire Wall. The emergency number for the fire brigade is **053 739 2222**.

11. FINANCIAL AND CREDIT RISK

An FSP should always make sure that its financial soundness is maintained as per board notice 194 of 2017. In the event of a significant business disruption, Koinz will determine its financial ability to continue to operate and service its clients.

Koinz will contact product suppliers, clients and critical banks to apprise them of the financial status and notify the Regulator if required.

12. Data Back-Up and Recovery (Hard Copy and Electronic)

Koinz maintains its back-up hard copy items and records at Metro file. These records are physical copies of client's records. JustplainIT is responsible for the back-up of all the electronic data. Backing up of data is done on a daily basis but however each month there are reports that are generated for Koinz by JustplainIT.



In the event that we lose electronic records, we will electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

13. KOINZ OPERATIONAL CRITICAL SYSTEMS

These are considered as those systems that ensure prompt and accurate processing of Koinz transactions.

13.1. EASE FICA

Koinz uses Easefica system when onboarding clients. The use of this system is done by capturing client data electronically. In the event of a SBD all the necessary documentation is collected from the clients (physical copies). The KYC declaration form can be sent to the client to fill in.

Once the Ease-fica system is back, information can be captured, and client documents will be uploaded on the system. The physical copies of client documents are locked in the firewall cupboard where the documents can be kept safe as per POPIA requirements.

Given that the Easefica is not functioning, client data or information will be kept on the Bitrix Premise CRM system which acts as a backup.

13.2. CRM SYSTEM

Client data after being captured on the Easefica system, it is backed on the CRM System which is the Bitrix on Premise system.

In the event of a SBD, client documents will be captured on the Easefica System. Once the system is recovered, all the information captured on the Easefica system shall be captured on the Bitrix Premises CRM system.

14. Alternate Communications Between the Firm and Customers, Employees, and Regulators

14.1. Communication with clients

We now communicate with our customers using the telephone, email, our website and mail and in-person visits at our Business Premises. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed.

14.2. Communication with employees

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We now communicate with our employees using telephone, email, and in person. In the event of a SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call register so that senior management can reach all employees quickly during an SBD. The call register includes all staff home and office phone numbers.

14.3. Communication with the regulator

We communicate with our regulators using telephone, email, mail. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party

15. BANKING FACILITIES

In the event of a SBD our banks shall determine if they can continue to provide the services that we will need in light of the internal or external SBD. The bank maintaining our operating account is FNB Bank. The bank maintaining our Client Funds is FNB Bank.

16. Training

Training is an important aspect of the plan. It is crucial that the staff of the business have an intimate and up to date knowledge of the recovery procedures related to each disaster category. The more complete the training, the less panic there will be in a disaster situation. Training is conducted annually.

17. Responsibilities

Mark Howard Weetman – As Director and authorised individual to act on behalf of the FSP, he will take responsibility for strategic decision making, should one of the above events occur.

Louise Fourie- as the other Director will assist as far as the financial systems and finances are concerned. He will also take over should something happen to the other Director.

18. Ownership and Accountability

This policy is owned by **Koinz (PTY) LTD**, an authorised financial services provider in terms of the Financial Advisory & Intermediary Services Act (37 of 2002) and subordinate legislation.

As Key Individual of the Provider, I **Mark Howard Weetman**, hereby confirm the adoption of the policy on behalf of the governing body of the Provider. I hereby accept responsibility for the successful training of employees and successful implementation of this Policy.



Signature

Date

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