

# **BROKER CONTINGENCY PLAN**

## **Business Continuity and Disaster Recovery Plan**

**Firm Name:** Tariq Vohra Securities Private Limited

**TREC Number:** 949

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### **1. Introduction and Purpose**

#### **1.1. Objective**

The objective of this Business Continuity Plan (BCP) and Disaster Recovery (DR) Plan is to establish firm-wide resilience and procedures to maintain or rapidly resume critical operations following a disruption. This plan aims to:

- Ensure the safety of employees.
- Protect critical data and systems.
- Maintain connectivity with the Pakistan Stock Exchange (PSX) Primary and DR sites.
- Ensure continuous service to clients during and after a disruptive event.
- Comply with Clause 4.28 and Clause 8.3.2 of the PSX Regulations .

#### **1.2. Scope**

This plan covers all core functions of the brokerage, including:

- Trading Operations (Equities, etc.).
- Clearing and Settlement (connectivity with NCCPL).
- Risk Management and Compliance.
- Client Support and Communications.
- IT Infrastructure (Servers, Networks, Trading Terminals).

### **2. Regulatory and Policy Framework**

This plan is established in accordance with the following regulatory instruments :

1. **Securities Brokers (Licensing and Operations) Regulations, 2016:** Specifically Clause 10.

2. **PSX Regulation Clause 4.27 & 4.28:** Regarding Contingency Planning and continuity of operations.
3. **PSX Regulation Clause 8.3.2:** Mandating brokers to have DR Terminals connected to the PSX Primary Site *and* the PSX DR Site.
4. **PSX Regulation Clause 9.9:** General obligations of TREC Holders.
5. **PSX Minimum Information Security Standards for Securities Brokers.**
6. **SECP Guidelines for Internal Control System and Compliance Function for Securities Brokers (Clause 35).**

### 3. Business Continuity and Disaster Recovery Infrastructure

#### 3.1. Primary and DR Site Connectivity

As per the amended Clause 8.3.2, the broker maintains adequate infrastructure to ensure seamless transactions :

- **Primary Trading Floor:** Located at [Mezzanine Floor, 91-C Jami commercial Street 11, DHA Phase 7, Karachi]. This houses the primary trading terminals connected to the **Eclears Primary Site**.
- **Disaster Recovery (DR) Site:** Located at [10/B, 1<sup>st</sup> Central Lane, DHA Phase 2, Karachi]. This site is geographically diverse from the primary site to avoid simultaneous outages.
- **DR Terminal Connectivity:** The DR Site maintains active terminals connected to both:
  1. The **Eclears Primary Site** (for normal operations if needed).
  2. The **PSX Disaster Recovery (DR) Site** (to ensure operability during a PSX-level DR event).
- **Connectivity Modes:** Redundant internet links (e.g., Fiber, 4G/LTE Backup) lines are utilized to ensure constant connectivity.

#### 3.2. Data Backup and Redundancy

- **Real-time Data Replication:** All critical data (trades, client records) is replicated in real-time to servers at the DR Site.
- **Backup Schedule:** Full system backups are performed daily and stored off-site securely.

- **Power Backup:** UPS systems and generators are available at both Primary and DR sites to ensure minimum 8 hours of operations during power failure.

#### 4. Incident Response and Escalation

##### 4.1. Incident Classification

Level	Definition	Example
Level 3 (Minor)	Localized issue, minimal impact.	Single terminal failure.
Level 2 (Significant)	Widespread internal issue.	Office network outage, Server failure.
Level 1 (Critical)	Catastrophic event, site unusable.	Fire, Building collapse, City-wide lock

##### 4.2. Escalation Matrix

Upon identification of a disruption, the following chain must be notified:

1. **IT Department:** Immediate notification for technical diagnosis.
2. **BCP Coordinator:** To assess the severity and activate the plan.
3. **Chief Executive Officer :** For strategic decisions.
4. **Compliance Officer:** To handle regulatory reporting to PSX.

#### 5. Continuity Strategies and Activation

##### 5.1. Scenario A: Disruption at Broker's Primary Site

If the Primary Office becomes inoperable (e.g., fire, network outage), the **DR Site** will be activated.

- **Action:** Key staff will relocate to the DR Site or work remotely if DR terminals are configured for remote access.
- **Connectivity:** Staff will log in to trading terminals at the DR Site, which are connected to the **PSX Primary Site**.
- **RTO (Recovery Time Objective):** Operations resume within [e.g., 05-10] minutes.

##### 5.2. Scenario B: Disruption at Eclears Primary Site

If Eclear declares a DR event due to failure at their primary data center:

- **Action:** The broker's DR Terminals (located at our DR Site) must immediately connect to the **PSX DR Site** .
- **Fallback:** Traders at the Primary Office will switch connectivity to route through the DR Site or connect directly to the PSX DR Site as per instructions from the Exchange.
- **Coordination:** The firm will participate in PSX-mandated DR drills to ensure readiness for this scenario .

### 5.3. Scenario C: Regional/City-Wide Lockdown

In case of pandemics, civil unrest, or natural disasters preventing office access:

- **Work from Home:** Traders and staff will use secured VPNs to connect to the firm's DR Site or trading servers.
- **Authorization:** Temporary relaxations (if any) granted by the SECP/PSX regarding remote trading will be strictly adhered to .

## 6. Communication Plan

During a disruption, clear communication is vital to maintain client trust and regulatory compliance .

Audience	Communication Channel	Message Owner
Employees	Phone tree, WhatsApp Group, SMS.	BCP Coordinator
Clients	Website banner, Email, SMS broadcast.	Head of Client S
PSX / NCCPL / SECP	Designated Compliance Officer contact, Email.	Compliance Of
Vendors (NCCPL, CDC)	Direct phone contact, Support tickets.	IT Head

## 7. Testing and Training

### 7.1. DR Drills

PSX mandates that brokers must confirm their DR readiness through successful testing .  
This firm will conduct:

- **Quarterly Internal Drills:** Testing failover from Primary to DR Site.

- **Annual PSX DR Drill:** Mandatory participation in the Exchange-wide drill to test connectivity with the **PSX DR Site**.

## 7.2. Plan Review and Updates

This plan is a living document. It will be reviewed:

- **Annually:** By the Compliance and IT departments.
- **Post-Incident:** To incorporate lessons learned.
- **Post-Regulatory Change:** To align with new PSX/SECP directives.

### Certification:

I, Muhammad Asif Vohra, certify that this Contingency Plan has been reviewed and adequately addresses the requirements set forth by the Pakistan Stock Exchange to ensure the continuity of our brokerage operations.

Signature: \_\_\_\_\_

