

Hindusthan Microfinance Private Limited

(HMPL)

Business Continuity & Disaster Recovery Plan

Hindusthan Microfinance Private Limited (HMPL)
706 Sagar Tech Plaza 'B' Wing, Sakinaka Junction,
Kurla-Andheri Road, Andheri (East), MUMBAI-400072.Maharashtra, India.
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PART: I:

1. Aim of the Business Continuity & Disaster Recovery plan: This plan has been designed to prepare Hindusthan Microfinance Pvt Ltd.to cope up with the effects of an emergency. It is intended that this document will provide the basis for a relatively quick and painless return to uninterrupted "business as usual" regardless of the cause and circumstances. The critical areas have been identified and the responsibility has been entrusted to the designated staff members in order to sustain the continuous and smooth operation of the company's activities with the minimum interruption/disturbances to the day to day operations.

2. Objectives of the plan:

To provide a flexible response so that Hindusthan Microfinance Pvt .Ltd can:-

- Respond to a disruptive incident and situations (incident management)
- Maintain delivery of critical activities/services during an incident (business continuity)
- Return to 'business as usual' back to normalcy (resumption and recovery)
- Initiate measures for restoration of activities as a part of Disaster Recovery Plan.
- The Business Continuity Plan also includes as how to envisage the Impact created due to declaration of "DEMONETIZATION" by Government of India in the year 2016

3. Business Priorities: Critical Function Checklist:

The services used as a checklist to ensure that critical tasks are completed on time.

4. Critical Function Analysis and Recovery Process:

Priorit y	Critical function	Potential impact on organization if interrupted.	Potential relocation or alternate premises available.I f so where from.	Resources required for recovery (staff or equipments/back up data/systems)	Responsible person's names for follow up & his Designation	Contact numbers.	Recovery Time frame(how quickly must this function be recovered to avoid lasting damage)
1	Power Failure	Activity may be suspended as CPU may not be able to support the system.	Relocation Not required	The Vendor/electric company will make the necessary arrangements for restoration.	Mr. Avadesh Ojha Admin ,Executive, Head Office	Mr. Avadesh Ojha 9820526022 & TATA Power Ltd.NO.1800209516	To assess at the time of incidence.
2	Air conditionin g stopped working	Inconvenience & hardships to the staff will take place	Relocation Not required	M/s. Johnson Controls-Hitachi Air Conditioning India Ltd. Unit No.18,Gr.floor,, Shivkrupa Industrial Estate, Opp. Raj Legacy, L.B.S.Road, Vikroli (W)Mumbai	Mr. Avadesh Ojha Admin, Executive, H.O	Mr. Gyanendra Singh, Vendor No,7738364397	

				400083.		
3	Computers hardware problems.	Interruption is not expected	Relocation Not required	The necessary arrangements will be made by the in house IT Executive posted.	Mr. Sanjeev Jogdandkar, IT Executive (Hardware/Networking) posted at H.O.	02249246827 Extn.22
4	Software issues	Interruption is not expected on activities.	Relocation Not required	Mr. Sanjeev Jogdoandkar, IT Executive (Hardware/Networki ng) posted at H.O.	Mr. Sanjeev Jogdoandkar, IT Executive (Hardware/Networking) posted at H.O.	022-49246827 Extn.22
5	Failure in Credit cloud connectivit y	The data entry/transactio ns activity may be affected.	Relocation Not required	Mr. Shekhar Shinde IT Executive at H.O.	Mr. Shekhar Shinde, IT Executive at HO	022-49246827 Extn.22
6	In case of fire broke out	Activity will be stopped.	The relocation will be at HCCS,	Inform to the fire brigade services.	Mr. Avadesh Ojha	022-49246827 Extn.19

			Jarimari office on temporary basis				
7	Stoppage of water supply	No interruption is expected.	Relocation Not required	BMC ward office or society's maintenance staff	Mr. Avadesh Ojha	022-49246827 Extn.19	
8	Loss of telephone connectivit y	No interruption	Relocation Not required	Report to MTNL staff.	Mr. Avadesh Ojha	022-49246827 Extn.19	
9.	Data Loss	Activity will be stopped,	Relocation Not required	CoPass Head Office at Virar.	Mr. Mohan Nanavare		

5. Emergency Response Check

This page should be used as a checklist during the emergency.

Tasks to be undertaken.	To be Completed on (date, time, by)
Actions within 24 hours:	
Start of log of actions and expenses undertaken (see section 9 Action and Expenses Log)	
Liaise with emergency services (see section 6E Contact List – Emergency Services)	
Identify and quantify any damage to the organisation, including staff, premises, equipment, data, records,	
etc	
Assess the key priorities for the remainder of the working day and take relevant action. Consider sending	
staff home, to recovery site etc	
Inform staff what is required of them. [Insert arrangements decided by organisation e.g. would staff be sent home? Will staff work from recovery site? Etc]	
Identify which critical functions have been disrupted (use section 3 Critical Function Checklist)	
Convene those responsible for recovering identified critical functions, and decide upon the actions to be	
taken, and in what time-frames (use section 4 Critical Function Analysis and Recovery Process)	
Provide information to:	
• Staff	
Suppliers and customers	
Insurance company	
Publicise the interim arrangements for delivery of critical activities. Ensure all stakeholders are kept	
informed of contingency arrangements as appropriate	
[Insert how this will be done e.g. website/telephone etc. Consider who needs to know the interim arrangements	
e.g. key stakeholders, customers, suppliers etc]	
Recover vital assets/equipment to enable delivery of critical activities.	
The essential equipment/resources/information that need to be recovered where possible are: [Insert details	
as relevant]	

Daily actions during the recovery process:	
Convene those responsible for recovery to understand progress made, obstacles encountered, and decide	
continuing recovery process	
Provide information to:	
• Staff	
Suppliers and customers	
Insurance company	
Provide public information to maintain the reputation of the organisation and keep relevant authorities	
informed	
Following the recovery process:	
Arrange for a brief of all staff and identify any additional staff welfare needs (e.g. counselling) or rewards	
Use information gained from the debrief to review and update this business continuity management plan	

6. Contact List of Staff members.

This section contains the contact details of staff members which are essential for continuing the operations of HMPL.

Name	Designation.	Office Contact	Mobile Contact
Mr. Ganesh Hankare	Manager(Finance & Accounts)	022419246827 Extn.25	9867608237
Mrs. Shaineela Ansari	Finance Executive	022419246827 Extn.25	9619879299
Mr. Ashok Mhaskar	Accounts Executive	022419246827 Extn.25	9766393233
Mr. Rajendra Jadhav.	CPU/Admin Head & Operation Manager	022-419246827 Exn.19	9820366709
Mr. Avadesh Ojha	Admin Executive	022-419246827, Extn.19	9820526022
Mr. Mr. Harishchandra Patil	Manager- Corporate Strategy & Project Management	022-419246827, Extn.23	9702345333
Mr. Mohan Nanavare	Manager (IT)	022-419246827 Extn.22	8879701070
Mr. Sanjeev Jogdandkar	IT Executive (Hardware/Networking)	022-419246827 Extn.22	9833100125
Mr. Shekhar Shinde	IT Executive	022-419246827 Extn.22	8898103374
Ms. Bhagyashree Jadhav	Manager- Corporate Strategy & Project Management	022-419246827 Extn.17	9619879341
Mr. Sandeep Desai	Manager - Human Resources	022-419246827 Extn.17	9870509630

7. Utility Companies Contact List

Utility	Company	Telephone	E-mail
Electricity	TATA Power Co .Ltd., Mumbai	18002095161	customercare@tatapower.com
Gas	Mahanagar Gas Ltd.	NA	N.A.
Telecommunications	MTNL	022	
		28593910	
Water supply	BMC, Water department. L ward.	022-	
Air conditioning	AMC by M/s, Johnson Controls-Hitachi Air Conditioning India	7738364397	Johnson
	Ltd.Unit No.18,Gr.floor,, Shivkrupa Industrial Estate, Opp. Raj	Mr. Singh.	
	Legacy, L.B.S.Road, Vikroli (W)Mumbai 400083.		
Computer Hardware	Mr. Sanjeev Jogdandkar, IT Executive (Hardware/Networking)	9833100125	sanjeev.hindusthan@gmail.com
	posted at H.O.		
Computer software	Mr. Sanjeev Jogdandkar , IT Executive	9833100125	sanjeev.hindusthan@gmail.com
	(Hardware/Networking).		
Credit cloud Co pass	Shri Shinde, IT Executive posted at H.O.	8898103374	shekhar.hindusthan@gmail.com
CCTV	Mr. Sanjeev Jogdandkar , IT Executive	9833100125	sanjeev.hindusthan@gmail.com
	(Hardware/Networking).		

Include a plan of your premises (for use by emergency services) showing locations of:

- Main water stop-cock
- Switches for gas and electricity supply
- Any hazardous substances
- Items that would have priority if salvage became a possibility

8. Local Emergency Services

Service	Location	Telephone
Ambulance	Emergencies	
Fire Service	Emergencies	18002095161
Floodline (BMC)	Information service	
Saki Naka Police Station.	Emergencies:	022-28476160,
	Non-emergency matters:	
Power supply	Emergencies	18002095161
Security Sagar Tech Plaza B wing.	Emergencies Mr. Rupesh, Manager	9619897733

9. Insurance and Finance Companies

Sr. No.	Name of the Bank	Contact No.	Address
1	State bank of India		Hotel Airways Bldg.202, Lal Bahadur Shastri Marg, 'Ghatkopar West, Mumbai -400086
2	IDBI Bank lTd	Ph No.:022-61274687 Mob. No.:+91 9869544452	Marigold House,Plot No.A-34,Cross Road No-2,Marol,MIDC Andheri East,Mumbai-400093
3	SIDBI	Ph : 022-2288 546 (Ext 783) Mob : 7706045601	SIDBI Tower, 15, Ashok Marg, Lucknow - 226001 Uttar Pradesh
4	Canara Bank	Ph: 022-2534 5491 Mob: 9819373794	Isan Arcade-1, 1st Floor Opp. Hanuman Mandir Gokhule Road, Naupada, Thane (W) Mumbai-400 602
5	MUDRA		MSME Development Centre, 1st floor, C-11, G-Block, Bandra Kurla Complex, Bandra E, Mumbai – 400 051
6	Reliance Commercial Finance Ltd	Ph No.:022-233036228 Mob. No.:+91-9022789803	Reliance Centre, 6th floor South Wing off Western Expesss Highway Santacruz (E) Mumbai - 400 055

7	Jain Sons Finlease Limited	Ph No.:22 619 52 715 Mob. No.:+9987971403	13C, 6th Floor, Techniplex-II IT Park, Off Veer Savarkar Flyover, Goregaon (W), Mumbai 400062, India		
8	Bandhan Bank	Ph No.:(033) 6609-0909 Mob. No.:+90073 88084	DN-32, Sector - V, Salt Lake City, Kolkata - 700091, West Bengal, India,		
9	Syndicate Bank	Ph No.:022-25215123 Mob. No.:+9969002710	82 Pokar Mansion, N G Acharya Marg Chembur Mumb ai 400 071 PBX: 022-25215123		
10	UCO Bank	Ph No.:022-29200318 Mob. No.:+94142 95153	Mid Corporate Branch, Marol Maroshi Road, Next To Fire Brigade, Andheri (E), Mumbai		
11	Capital First Ltd	Ph No.:022-4042 3421 Mob. No.:+99875 07916	One Indiabulls Centre, Tower 2A & 2B, 10th Floor, Senapati Bapat Marg, Lower Parel (West), Mumbai - 400 013		
12	Union Bank of India	Ph. No : 022-2649 5640 Mob. No: +98201 09395	La-avanti, Jn. of S.V. Road, Santacruz (West), Mumbai - 400 054		
INSUR	INSURANCE COMPANY				
14	National Insurance Company	Tel : 022-2202 6496	National Insurance Building, 14, Jamshedji Tata Road, Churchgate, Mumbai - 400020		

10. Emergency Pack Contents"

As part of the recovery plan for the organisation, key documents, records and equipment's are held at off-site premises at Hindusthan Cooperative Credit Society Ltd., Hindusthan Bhavan, Andheri - Kurla Road, Jarimari, Andheri (East), Mumbai in an emergency situations. This pack may be retrieved in an emergency to aid in the recovery process at Hindusthan Microfinance Pvt. Ltd. Saki Naka Head office The contents of the emergency pack comprise the following:

Documents:

- A copy of this plan, including key contact details
- Insurance policy
- Premises rent agreements.
- Annual maintenance contracts.
- Advance deposit receipts.

Records:

- Computer backup tapes and / or disks
- Financial records

Keys and Equipment's:

- Duplicate keys
- Torch and batteries

11. Actions and Expenses Log

This form should be used to record decisions, actions and expenses incurred in the recovery process. This will provide information for the post-recovery debriefing, and help to provide evidence of costs incurred for any claim under an insurance policy.

Date/time	Decision / action taken	By whom	Costs incurred

IMPACTS OF DEMONETISATION:

LOW GROWTH:

12. It is envisaged to assess the impact of Demonetization process declared by Govt. of India (GOI) in the year November, 2016 by de legalization of Specified Bank High Denomination currency notes from the economy. It is also envisaged to know the demonetization impacts created on the micro finance sector in general and Hindusthan Microfinance Pvt Ltd., customers in particular. The demonetization had resulted into slower growth in the economy and microfinance sector in the short run.

Due to an advent of Demonetization, its impact on economy and on Micro finance sector in particular continued even after March 2017. The slowdown in the economy was inevitable due to various factors viz. Cash shortage with borrowers and Banks, loss of jobs/job opportunities of borrowers, reduction in family household incomes etc. These factors predominantly affected the Micro finance sector growth which resulted into sluggish Loan disbursements in Microfinance sector in general and HMPL in particular.

INCREASE IN THE DELINQUNCY:

Due to an impact of Demonetization, the overall growth in Microfinance sector has been substantially slowed down in view of various factors e.g. slowing down of Economy in the short term, loss of job opportunities, Reduction in household income, Reduction in the Repayment capacity of borrowers etc. All these factors were responsible for the most sluggish growth in the sector which also substantially increased the PAR (Portfolio at Risk) of Micro finance sector due to insistence on Cashless transactions. This is to be noted that the delinquency percentage before the advent of demonetisation was below 0.5%.

The delinquency of loan accounts of all MFI companies including HMPL resulted into an increase in the aggregate PAR percentage as on 31st August 2017 at 23.87% in above 90 DPD bucket and 28.70% in above 30 DPD bucket. The situation was further aggravated by local level political leaders due to their false promises and rumors on loan waivers to microfinance borrowers. The implementation of GST also, further impacted customer's capability to honor their loan EMI commitments.

To control and arrest the increase in the delinquency, we had formed a Special dedicated Recovery Team at all the regions for an expeditious recovery in the old hard core accounts. These efforts yielded the positive result for the company. At the end of F.Y. March 2018 our total PAR position came substantially down to 2.71% which is within the benchmark of RBI.

<u>PART – II: INFORMATION TECHNOLOGY FRAMEWORK UNDER BCP OF HINDUSTHAN</u> <u>MICROFINANCE PVT. LTD.</u>

Reserve Bank of India, vide its circular no. RBI/DNBS/2016-17/53 dated June 08, 2017 issued guidelines as Master Direction No.BS.PPD.No.04/66.15.001/2016-17 for implementing Information Technology Framework for the NBFC Sector. Accordingly, directions on IT Frameworks for the NBFC sector that are expected to enhance safety, security, efficiency in processes leading to benefits for all NBFCs and their customers are issued.

The NBFC (Non-Banking Finance Company) sector has grown in size and complexity over the years. As the NBFC industry matures and achieves scale, its Information Technology /Information Security (IT/IS) framework, Business continuity planning (BCP), Disaster Recovery (DR) Management, IT audit, etc. bench marked to best practices.

2.The focus of the proposed IT framework of RBI is on **IT Governance**, **IT Policy**, **Information & Cyber Security**, **IT Operations**, **IS Audit**, **Business Continuity Planning and IT Services Outsourcing**.

Recommendations of RBI for NBFCs with asset size below ₹ 500 Crores:

- 3. It is recommended by RBI that smaller NBFCs may start with developing basic IT systems mainly for maintaining the database. NBFCs having asset size below ₹ 500 crores shall have a Board approved Information Technology policy/Information system policy. The policy should inter alia cover the following basic standards and aspects.
- i. Basic security aspects such as physical/logical access controls and well defined password policy;
- ii. A well-defined user role;
- iii. A Maker-checker concept to reduce the risk of error and misuse and to ensure reliability of data/information;
- iv. Information Security and Cyber Security;

- v. Requirements as regards Mobile Financial Services, Social Media and Digital Signature Certificates. It also provides a high level of security for online transactions by ensuring absolute privacy of the information exchanged using a Digital Signature Certificate. NBFCs may consider use of Digital signatures to protect the authenticity and integrity of important electronic documents and also for high value fund transfer by Authorized representatives.
- vi. NBFCs that are already using or intending to use Mobile Financial Services should develop a mechanism for safeguarding information assets that are used by mobile applications to provide services to customers. The technology used for mobile services should ensure confidentiality, integrity, authenticity and must provide for end-to end encryption.
- vii. NBFCs using Social Media to market their products should be well equipped in handling social media risks and threats. As Social Media is vulnerable to account takeovers and malware distribution, proper controls, such as encryption and secure connections, should be prevalent to mitigate such risks.
- viii. System generated reports for Top Management summarizing financial position including operating and non-operating revenues and expenses, cost benefit analysis of segments/verticals, cost of funds, etc.;
- ix. Adequacy to file regulatory returns to RBI (COSMOS Returns);
- x. A BCP policy duly approved by the Board ensuring regular oversight of the Board by way of periodic reports (at least once every year);
- xi. Arrangement for backup of data with periodic testing.
- **4. Bbusiness Continuity Plan** forms a significant part of an organization's overall Business Continuity Management plan, which includes policies, standards and procedures to ensure continuity, resumption and recovery of critical business processes. BCP has been designed to minimize the operational, financial, legal, reputational and other material consequences arising from a disaster. **HMPL has adopted a Board approved BCP/DRP Policy**. The functioning of BCP shall be monitored by the Board by way of periodic reports. The ED shall be

responsible for formulation, review and monitoring of BCP to ensure continued effectiveness. The BCP may have the following salient features:

- **5. Business Impact Analysis-** NBFCs shall first identify critical business verticals, locations and shared resources to come up with the detailed Business Impact Analysis. The process will envisage the impact of any unforeseen natural or man-made disasters on the NBFC's business. The entity shall clearly list the business impact areas in order of priority. HMPL has mentioned about this in the BCP and DRP enclosed herewith especially post DEMONETIZATION by GOI.
- **6. Recovery strategy/ Contingency Plan-** HMPL shall try to fully understand the vulnerabilities associated with interrelationships between various systems, departments and business processes. The BCP has anticipated the probabilities of various failure scenarios. Evaluation of various options has been done for recovery and the most cost-effective, practical strategy has been framed to minimize losses in case of a disaster. The recovery plans and retrieval of documents and information in HMPL has been covered in the BCP and DRP enclosed herewith.
- 7. HMPL has considered the need to put in place necessary backup sites for their critical business systems and Data centers?

In the light of the above provisions, we have accordingly, prepared the Information Technology framework incorporated the requisite basic IT standards and its implementation in Hindusthan Microfinance Pvt. Ltd., along with the Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP) which is placed at Annexure - I. This IT policy for Hindusthan Microfinance Pvt. Ltd., as per RBI recommendations has been designed accordingly considering the under mentioned basic standards and the systems.

The basic IT standards and its GAPs position vis-a-vis HMPL is appended below for reference. Annexure -I.

Sr.No.	Basic IT Standards	Position of GAPS in HMPL
1.	Basic security aspects such as physical/logical access controls and well defined password policy	HMPL does have the approved access control system and well defined password policy in place.
2.	A well-defined user role	In HMPL user roles of different functionaries at branches are defined as per the designations. Viz.BM/ABM/BA who are given both viewing/transactions rights. Regional Managers are given only viewing user rights of his region branches who are more involved in control functions of branches. At H.O. user roles are defined as per the designations equivalent to Cashier level/Manager level rights.
3.	A Maker-checker concept to reduce the risk of error and misuse and to ensure reliability of data/information	In order to ensure the entry of accurate and reliable data/information, the maker and checker system already put in place to avoid the risk of errors.
4.	Information Security and Cyber Security;	In order to protect the system, the necessary antivirus software has been installed in the PCs of all operating functionaries at branches/H.O. and kept updated from time to time, but firewall software is not yet configured, which shall be put in place in future as per the exigency.
5.	Requirements as regards Mobile Financial Services, Social Media and Digital Signature Certificates	Mobile App usage is implemented in HMPL for data entry of collection of Loan EMIs in the field by field staff. B. At present handling financial services are not enabled in mobile apps in full fledged capacity or no social media is used for the

		purpose in HMPL.
		C. The collection of Loan EMIs since are digitized by switching over to NACH (National Automated Clearing House) system since April 2017 onwards and all EMIs in respect of fresh advances are collected through NACH only. The efforts for conversion of existing (old) account holders are on and the task will be completed in futur.
		D. Digital signatures of authorized officials of HMPL are being used to protect the authenticity and integrity of important electronic documents and also for high value fund transfers in HMPL.
6.	System generated reports for Top Management summarizing financial position including operating and non-operating revenues and expenses, cost benefit analysis of segments/verticals, cost of funds, etc	At present various financial returns and reports are being generated in the system with MIS data viz.,B/S, PAR analysis reports, Trial balance, Cash book, etc., Demand/collection reports, Daily sales data, Loan summary report etc., for perusal of Top Management.
7.	Adequacy to file regulatory returns to RBI (COSMOS Returns);	The periodical regulatory returns to RBI are being uploaded online in the COSMOS site on time by HMPL and are found adequate.
8.	A BCP policy duly approved by the Board ensuring regular oversight of the Board by way of periodic reports (at least once every year)	A BCP/DRP policy will be drafted and placed in the Board for review and approval by 30 th September 2018. The BCP/DRP policy will be placed in Board meetings periodically to ensure about review and implementation in the company.

9.	Arrangement for backup of data with periodic testing	At present entire Core Banking system data is stored in Centralised
		Co Pass server at Mumbai and back up of the same is taken on
		regular daily basis locally at two different servers. Other than Core
		banking software, all other data is stored in separate hard disk at
		H.O.on regular weekly basis.

- HMPL do not have Board approved BCP/DRP policy at present. HMPL therefore proposed to draft the BCP/DRP policy along with the additions of steps and measures to be taken in case of unforeseen contingencies and put in place the necessary infrastructure for smooth functioning. The BCP/DRP shall be reviewed annually.
- The BCP/DRP shall comprise the up gradation of system wherever required with cyber security aspects for smooth and effective functioning at all the operating units including H.O. taking into consideration the scale of operations in the coming years. Although the present system is adequate to take care of the volume and scale of operations of the company. The future growth of company will be considered before augmenting the present system capacity.
- With the current system in place, all the regulatory returns are submitted online to Reserve Bank of India on COSMOS returns along
 with yearly statutory returns of HMPL. HMPL confirms that all these regulatory returns have been submitted to RBI from time to
 time.
- 8. HMPL shall test the BCP either annually or when significant IT or business changes take place to determine if the entity could be recovered to an acceptable level of business within the timeframe stated in the contingency plan. The test has been based on 'worst case scenarios' in Hindusthan Microfinance Pvt Ltd.
