

# Business Continuity Management Policy

## Review and Revision History

Version	Date	Prepared by	Reviewed by	Approved by	Change Description
1.0	1 <sup>st</sup> Sept 2023	Rebecca Sargalis & Rajan SG	John Murphy	Lara Owen	Initial draft
1.1	4 <sup>th</sup> June 2024	Rebecca Sargalis & Rajan SG	John Murphy & Dena Acevedo	Lara Owen	Annual review
1.2	18 Feb 2025	Rebecca Sargalis	John Murphy	Dena Acevedo	Updated document classification
1.3	25 <sup>th</sup> Feb 2026	Rebecca Sargalis	Rajan SG	John Murphy	Annual review

## Purpose

This document outlines the Business Continuity Management (BCM) program for NetApp, and its subsidiaries and affiliates (“NetApp” or “Company”). NetApp’s BCM program identifies and safeguards the life and safety of personnel deployed within its premises and the essential business processes required to maintain an acceptable level of operations and critical client services in the event of a business interruption. This policy describes, at a high level, the minimum requirements for establishing, restoring and maintaining business processes globally. The BCM policy is aligned with the BCM standard which is incorporated into the Company’s Business Continuity (BC) and Crisis management plans.

## Scope

The BCM policy applies to all global NetApp functions and its subsidiaries and affiliates, our personnel, facilities, and the required resources. An efficient response and recovery structure shall be maintained to facilitate a timely and orderly response from unplanned or unavoidable business interruptions.

We recognize that it is necessary to develop strategic and tactical capability to respond to incidents and disruptions in order to continue business operations with a minimum level of downtime. In addition to safeguarding the life and safety of employees, this policy provides guidance for the resumption and recovery of time sensitive business operations in accordance with pre-established timeframes as well as ensuring that adequate plans are in place for the less critical business operations.

IT Disaster recovery and IT incident response are out of scope.

## Objectives

The Business Continuity objectives aim to ensure the availability of minimum levels of key services to achieve the organization’s business objectives during a disruption.

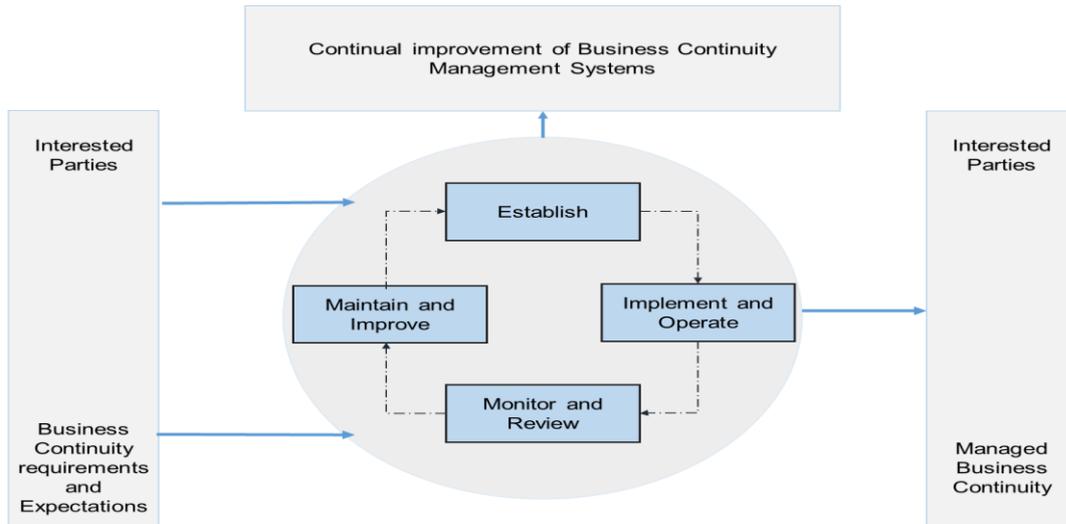
NetApp’s core BCM objectives have been identified as:

- Safeguard employees and respond to emergency situations in a safe, effective and timely manner and identify threats and their potential impacts and provide a framework for building enterprise resilience.
- Ensuring continuity of operations within the stipulated recovery timeframe with minimal impact due to disruption.
- Standardize the business continuity process across the organization.
- Protect NetApp in the event of an unplanned interruption to its operations.

## BCMS Framework

NetApp BCMS applies the standard of Plan-Do-Check-Act (PDCA) model for Planning, establishing, implementing, operating, monitoring, reviewing, maintaining and continually improving the effectiveness of BCMS. The below image illustrates how a BCMS takes inputs from interested parties and requirements for continuity management and through the necessary actions, process, procedures to achieve business continuity outcomes.

Plan	Establish Business Continuity Policy, Objectives, Targets, Controls, Processes and Procedures relevant to managing risk and improving business continuity to deliver results in accordance with an organization’s overall Policies and Objectives
Do	Implement and operate the Business Continuity Policy, Controls, Processes and Procedures.
Check	Monitor and Review performance against Business Continuity Objectives and Policy, report the results to Management for review, and determine and authorize actions for remediation and improvement.
Act	Maintain and improve the BCMS by taking preventive and corrective actions, based on the results of management review and re-appraising the scope of the BCMS and business continuity objectives and policy.

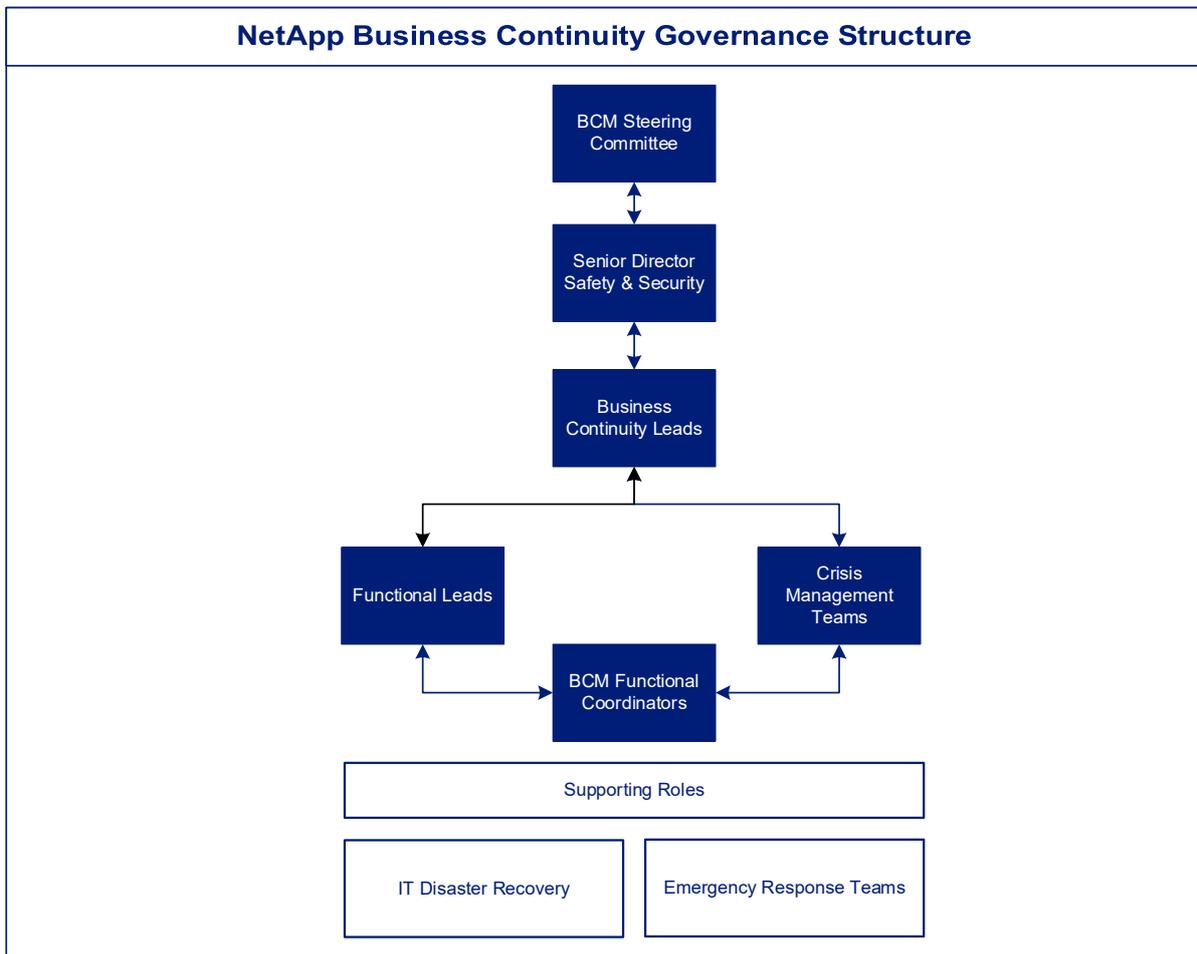


### BCM Organization/Governance Structure

The BCMS Organization for Implementation and maintenance at NetApp is constituted by hierarchical groups at different levels that have been assigned specific roles and responsibilities to discharge/ during:

1. The Implementation and Maintenance of BCMS
2. Crisis Management during all stages of crisis

BCMS organization structure consists of the following groups:





## Policy Statement

The BCM program will implement a consistent and repeatable BCM process for identifying and assessing hazards/threats, understanding their impacts to NetApp's operations, and for planning and responding to unavoidable business interruptions. The organization considers safety as its top priority and other business continuity priorities will be based on decisions made by the organization's management, contractual, statutory, and other applicable requirements. In accordance with this policy, it is incumbent upon the responsible employees to ensure that the BCM program:

- Prioritizes the life and safety NetApp's people or any person at a NetApp facility.
- Ensures continuity of critical operations during disruptions or to minimize the duration of their unavailability, while abiding to legal, contractual, and regulatory obligations.
- Provides strategies / solutions to meet recovery time objectives (RTO).
- Establishes training for all roles in the BCM Program on the implementation of its business continuity planning controls to maintain staff preparedness in the event of plan activation.
- Provides leadership with information and evaluation criteria of the program's execution, maturity, and level of preparedness, while maintaining a continuous improvement mindset.

The BCM process shall be reviewed no less than annually and updated as necessary. Responsible employees should identify any new potential events that could cause business interruptions. Employees should evaluate event probability, impact, and potential consequences to business processes. The BCM process currently establishes the following procedures, which are chronologically listed in the form of the initial risk & impact analysis to eventual periodic review:

- **Business Impact Analysis:** Identifies and prioritizes critical processes and their resources and dependencies, including employee impact, legal, reputation, strategic / customer, and financial impact.
- **Risk Assessment:** Identifies, analyses and evaluates the risk of disruptive incidents to the organization.
- **Recovery Strategy Selection / Development:** Determine the recovery strategy options for interruptions that cause the unavailability of people, processes or facilities.
- **Plan Development:** Document plans that appropriately address business continuity, emergency management, and crisis management procedures (including, but not limited to, a plan for communicating with customers, partners, and key stakeholders).
- **Testing, Training and Awareness:** Exercising recovery strategies and plan documentation on a periodic basis for gap identification and enhancement opportunities and to ensure that employees are educated, trained and are aware of BCM arrangements.
- **Periodic Maintenance and Review:** Keeping program documentation current, while reporting key metrics to leadership.

Employees are expected to fully cooperate with personnel charged with developing, maintaining and implementing the BCM program.

The Business Continuity Management System (BCMS) is aligned to international standard ISO 22301: 2019 (E) – Societal Security – Business Continuity Management Systems – Requirements.

### **Policy Review and Approval Process**

The BCM Policy, governance structure and procedures shall be reviewed and maintained by the Business Continuity Team. The BCM Policy will be reviewed annually by the Legal Team and approved by the VP of Workplace Experience.

Additionally, changes to the BCM Policy and the standard shall be carried out in the following scenarios:

- Major changes to the organization that might have impact to BCMS.
- Changes based on mandatory contractual or regulatory requirements.
- Any Changes in corporate BCM framework.

The Business Resilience Program Managers have the primary responsibility for the development, issuance, maintenance, and compliance of the policy. Any changes to the NetApp BCM Policy document shall be reviewed and documented by the Business Resilience Managers.

### **Appendix**

[Business Continuity Standard](#)