



### BUSINESS CONTINUITY TRAINING PROGRAM

Comdata Network, Incorporated (“Comdata”) recognizes that our customers expect reliable and timely delivery of the products and services which they have purchased. In the event a system failure or natural disaster creates a business disruption, Comdata’s responsibility is to restore services in a timely manner and to a sufficient level in order to allow our customers continuity of their daily business operations. Comdata therefore maintains a Business Continuity Program (BCP) designed to minimize the effect of any such disruption.

#### 1. Our Primary Objectives

The primary objectives of the Comdata BCP program are to:

- Identify critical people, processes, and technologies that would need to be replicated or recovered in order to provide our products and services in the event of an emergency.
- Create a strategy to recover the ability to deliver our products and services in the event of likely emergency scenarios.
- Obtain adequate equipment and technology required to execute the strategy.
- Test the strategy on a periodic basis to help ensure it will function properly in the event of an actual emergency.

Comdata’s philosophy also focuses on disaster avoidance. Our goal is to anticipate potential interruptions to critical business processes and to employ the appropriate tools to prevent those interruptions proactively.

#### 2. Instructions

(1) Develop an exercise strategy that does not put the organization at risk, is practical, cost-effective, appropriate to the organization, and ensures a high level of confidence in recovery capability. (2) Employ a logical, structured approach that effectively analyzes complex issues (3) Create a suitable set of exercise guidelines (4) Determine exercise requirements by defining exercise objectives and establish acceptable levels of success. (5) Identify types of exercises, and their advantages and disadvantages. Some of the options are as follows:

Training Scenarios	
1.	Walk-through / tabletop
2.	Simulations
3.	Modular/component (call trees, applications, etc.)
4.	Functional (specific lines of business)
5.	Announced/planned
6.	Unannounced/surprised

(6) Continue by selecting an exercise and documenting the scope of the exercise, participants, timing, etc. (7) Develop realistic scenarios by creating exercises similar to the types of incidents the organization is likely to experience - and the problems associated with these incidents (8) Map scenarios identified into different test types (9) Establish exercise evaluation criteria and document findings based on the categories of Measurable, Quantitative, and Qualitative (10) Document results as per criteria identified through expected versus actual results as well as unexpected results (11) Create an exercise schedule that is both progressive and incremental with realistic time scales (12) Prepare exercise control plans and reports (13) Define exercise objectives for the appropriate scenarios. Objectives should include the following measurements:

Objectives and Performance Measurements
Define assumptions and describe limitations
Identify resources required to conduct the exercise, identify participants; ensure all understand the objectives and their roles
Identify exercise adjudicators (umpires), and clearly identify all roles and responsibilities
Provide an inventory of items required for the exercise and specifications for the exercise environment
Provide a timetable of events and circulate to all participants, facilitators, and adjudicators
In the event of a real situation occurring during an exercise, a predetermined mechanism for canceling the exercise and invoking the real business continuity process should take place

(14) Facilitate exercises that execute the exercise(s) as planned above (15) Audit the exercise actions. (16) Finally, provide a cogent, comprehensive summary with recommendations and is commensurated in levels of confidentiality requested by exercise umpire/adjudicator or as specified by the subject organization

#### 3. Analyzing the Results

(1) Conduct debriefing sessions to review exercise results and identify action items for improvement (2) Identify actions and owners for recommendations; confirm owner acceptance (3) Confirm time schedules for completing or reviewing agreed actions (4) Monitor (and escalate where necessary) progress to completion of agreed actions (5) Define ownership of plan data (6) Prepare maintenance schedules, review procedures, monitor activities, establish update process, audit and control (7) Ensure that scheduled plan maintenance addresses all documented recommendations (8) Formulate change control procedures by analyzing business changes and business continuity planning implications (9) Set guidelines for feedback of changes to planning function (10) Develop change control procedures to monitor changes (11) Create proper version control; develop plan reissue, distribution, and circulation procedures (12) Identify plan distribution list for circulation (13) Lastly, establish action plans and reporting procedures that address content, frequency, recipients and objectives of the audit results copasetic to the following objectives:

Reporting and Performance Measurements
Evaluate the adequacy of emergency provisions and procedures
Recommend improved positions if weaknesses exist
Audit the BCP.s Documentation Control Procedures
Determine whether the BCP is available to key personnel
Review update procedures
Demonstrate that update procedures are effective
Security of backup copies of the BCP for emergency use
List those individuals with copies of the BCP
Ensure that BCP copies are current