



A JUMBO COMPANY

Business Continuity Plan

Approval date	Replaces version dated	Senior Leadership Group sponsor	Approved by	Next review date
04/07/2024	30/06/2023	General Manager - Gatherwell	Head of Operations - UK	30/06/2025

Contents

Business Continuity Plan	1
1. Introduction and purpose	3
2. Scope of this Business Continuity Plan (BCP)	3
3. The BCP management team	3
4. Responsibilities of personnel	3
5. BCP procedures	4
6. Staff welfare and feedback	4
7. Training	5
8. Testing	5
9. Review of this BCP	5
Appendix 1: Business Priorities	6
Appendix 2: Plan Activation	7
Appendix 3: Response to PR issues	13
Appendix 4: Important contact information	14

COPY

1. Introduction and purpose

1.1. It is the policy of Gatherwell Limited (hereinafter referred to as **Gatherwell**, or **we, us, our**) to ensure that if our business is interrupted, we can become fully operational as quickly as possible. In doing so, we aim to protect our staff, clients and customers and any other parties we have dealings with. This plan contains the procedures we will follow should we suffer a business interruption.

2. Scope of this Business Continuity Plan (BCP)

2.1. This BCP applies to all of our directors, managers, employees, contractors, agency workers, interns, volunteers and trainees and apprentices (**personnel**).

2.2. Examples of incidents that would invoke this BCP are flood, fire, theft, IT failure, communications failure, adverse weather, loss of key personnel, terrorism, cyber-security incident or public health events.

2.3. We have identified our business priorities and target resolution times in Appendix 1.

3. The BCP management team

3.1. The General Manager has ultimate responsibility for the design, maintenance, implementation and testing of this BCP. They are assisted by the Team Leaders for each business function and Jumbo Interactive's corporate support functions.

3.2. In the event of an incident, the General Manager and Team Leaders will:

3.2.1. determine necessary actions;

3.2.2. carry out those actions or identify and direct others to do so;

3.2.3. communicate with personnel about the incident and actions being taken as appropriate.

3.3. A list of contact details for Gatherwell personnel can be found at Appendix 4. The list also contains contact details for key suppliers. The contents of this list are confidential.

4. Responsibilities of personnel

4.1. Ensure that you understand the contents of this BCP. If you have any questions you should contact the General Manager.

4.2. Ensure your contact information held by the People & Culture team is up to date at all times.

4.3. Follow our BCP procedures.

5. BCP procedures

5.1. What to do if an incident occurs during normal business hours

5.1.1. If you discover an incident during normal business hours, you must contact both your Team Leader and the General Manager. If neither person is available, you must contact another Team Leader.

5.1.2. If you are alerted to an incident during normal business hours, you must comply with instructions given by the General Manager and your Team Leader.

5.2. What to do if an incident occurs out of business hours

5.2.1. If an incident occurs out of office hours, the General Manager will provide information and issue guidance and instructions through the communications methods set out in section 5.3 below.

5.3. **Plan activation.** Appendix 2 sets out the processes and procedures to be followed in the event of an incident.

5.4. Communication methods

5.4.1. The General Manager will keep relevant personnel up to date by the following method:

5.4.1.1. by telephone; and

5.4.1.2. mobile phone text cascade of information if appropriate.

5.4.2. Information may be made available via the Gatherwell website depending on the reason for business disruption.

5.5. Media and PR

5.5.1. If a media enquiry is made, no response should be given for Gatherwell unless approved by the General Manager, Group Marketing, Investor Relations and Group Legal.

5.5.2. Appendix 3 contains examples of standard responses which may be adapted according to the relevant circumstances.

6. Staff welfare and feedback

6.1. All personnel need to be given clear direction about what our business priorities are. This can be achieved by having detailed continuity strategies in place. During business interruptions, Team Leaders should monitor their team members more closely to ensure that their welfare is maintained (e.g. regular breaks due to

increased intensity or pressure of work, and support in case their normal duties change).

- 6.2. All personnel should be given the opportunity to feedback any comments they may have after the business incident response phase and when we return to business as usual. This may be in the form of a structured debrief or more informally.
- 6.3. Team Leaders who have reason to believe that their team members have suffered stress or trauma from the business disruption must consider providing assistance for those affected team members.

7. Training

7.1. All personnel will receive training on the requirements of the BCP, including:

- 7.1.1. regular training for existing personnel;
- 7.1.2. training for new personnel at induction;
- 7.1.3. updates following any changes to the BCP;
- 7.1.4. focused training for individual personnel or teams responsible for BCP implementation tasks.

8. Testing

8.1. We may test the procedures contained in this BCP to assess their effectiveness.

8.2. Testing methods may include:

- 8.2.1. undertaking an out of hours IT recovery test;
- 8.2.2. testing contact information for key staff and suppliers to ensure it is up to date;
- 8.2.3. testing whether our communication cascade system is effective.

9. Review of this BCP

9.1. We will review our BCP annually.

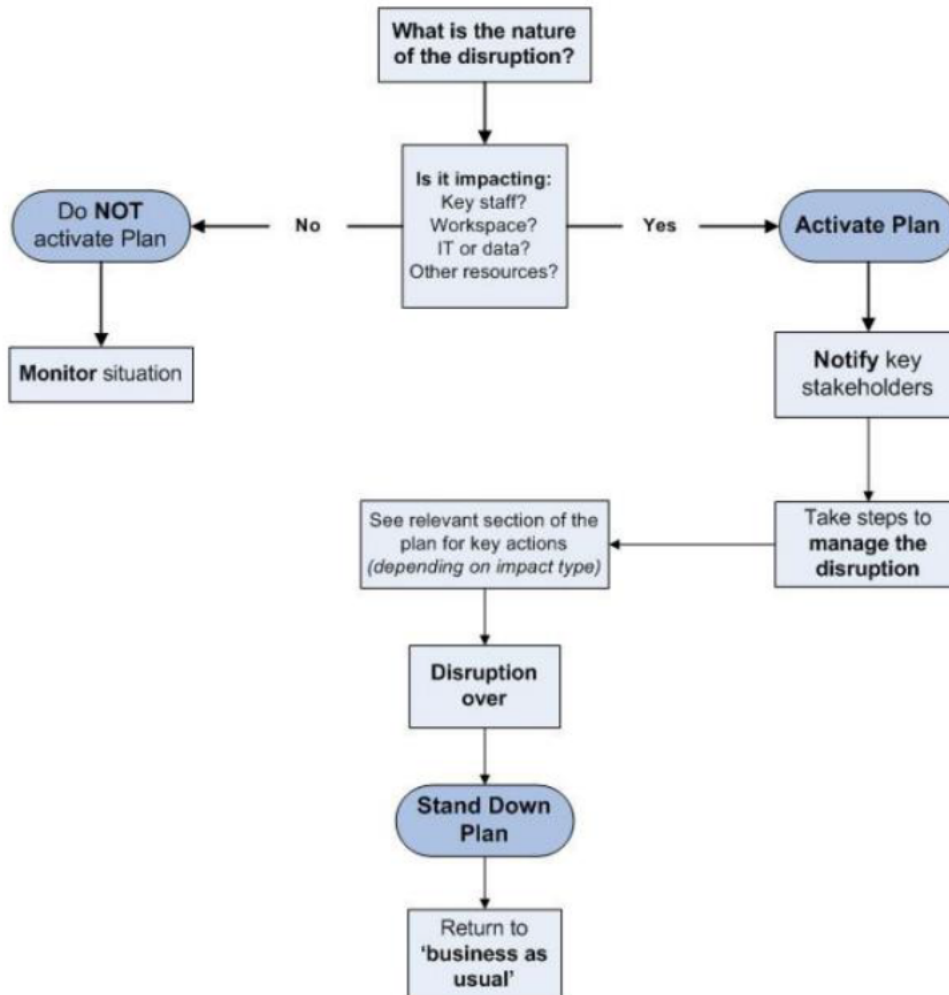
9.2. We will provide information and/or training on any changes we make.

Appendix 1: Business Priorities

Business Priority	Service / Product
1	Ticket purchase: <ul style="list-style-type: none">- Working hours – 1 hour response – 4 hour resolution- Out of hours – 4 hour response – 12 hour resolution
1	Draw functionality: <ul style="list-style-type: none">- 1 hour response – 2 hour resolution
2	Good Cause signups: <ul style="list-style-type: none">- Working hours – 1 hour response – 8 hour resolution- Out of hours – 8 hour response – 24 hour resolution
2	Email confirmations (payment): <ul style="list-style-type: none">- Working hours – 1 hour response – 8 hour resolution- Out of hours – 8 hour response – 24 hour resolution
3	System emails (daily reports and action emails): <ul style="list-style-type: none">- Working hours – 1 hour response – 24 hour resolution- Out of hours – next working day – next working day + 24 hour resolution

Appendix 2: Plan Activation

Plan Activation Process



Workspace

Objective	Actions or Considerations
Establish the current situation at the affected site or workspace.	<ul style="list-style-type: none"> ● What has happened? ● When did it occur? ● Are the Emergency Services informed or on-site? ● Is there access to the site? ● Are the IT systems and services still running? ● Who else has been informed? ● How potentially serious is it? ● Are there any casualties? If so, details?
Decide whether to invoke Business Continuity plan.	<p>The decision will be based upon the information provided consideration should be given to:</p> <ul style="list-style-type: none"> ● How quickly the business will be able to re-enter the affected workspace? ● Prevailing weather conditions. ● Whether the area is currently responding to an external incident. ● If the decision is to relocate key staff to the agreed alternative accommodation alert the site – (contact details in table below). ● If the decision is made not to invoke the plan, continue to monitor the situation until such time as normal access is granted to the disrupted location.
Communicate with staff, suppliers or customers.	<ul style="list-style-type: none"> ● IF EVACUATION IS NEEDED: follow site evacuation plan taking into account staff, customer and visitor safety. ● Keep staff informed at Assembly Points until a decision has been made about whether the building is likely to become available again soon. If the building will not be available, relocate identified key staff to the agreed alternative workspace and consider sending other staff home and tell them to await instructions. Remind them to check in with their manager at an agreed time. ● Out of Hours: if the disruption occurs outside office hours, staff communication will be co-ordinated by the manager or their designated staff member. ● Take the Emergency Grab bag with you

IT/Data

Objective	Actions or Considerations
<p>Confirm the nature of the disruption.</p>	<ul style="list-style-type: none"> ● What has happened? ● When did it occur? ● Which systems and/or services are affected? ● How potentially serious is it? ● What is the estimated duration of the problem? ● Who else has been informed (staff/ suppliers / customers)?
<p>Decide whether to invoke Business Continuity plan.</p>	<ul style="list-style-type: none"> ● The decision will be based upon the information provided consideration should be given to: ● How long systems will be unavailable? ● Whether the systems affected are required to support the business priorities? ● Whether the area is currently responding to an external incident? ● Inform staff that the Business Continuity Plan is being invoked or put staff on standby or invoke agreed manual systems to ensure that the service can continue to operate. ● If the decision is made not to invoke the plan, continue to monitor the situation until such time as normal service is resumed..
<p>Enter specific actions or considerations if the disruption is due to non availability of IT systems or Data.</p>	<ul style="list-style-type: none"> ● Some examples of solutions / strategies: ● Instigate manual work around systems ● Rerouting of calls ● Accessing and making available critical data to key staff which has been protected. ● Keeping back up data securely off site, consider how often you might need to back data up, daily weekly etc. ● Working from a secondary location unaffected by the IT issue. ● If the main landline(s) are lost revert to mobile phones and give number to key staff / suppliers / customers. Consider putting the mobile number on your website/twitter account if you lose your main land line.

Key staff

Objective	Actions or Considerations
Confirm the nature of the disruption.	<ul style="list-style-type: none"> ● What has happened? ● When did it occur? ● Who and how many are affected? ● Which systems and/or services are affected? ● How potentially serious is it? ● What is the estimated duration of the problem? ● Who else has been informed (staff/ suppliers / customers)?
Decide whether to invoke Business Continuity plan.	<ul style="list-style-type: none"> ● The decision will be based upon the information provided consideration should be given to: ● How long staff will be unavailable? ● Whether the staff affected are required to support the business priorities? ● Whether the area is currently responding to an external incident? ● Inform staff that the Business Continuity Plan is being invoked or put staff on standby or invoke agreed manual systems to ensure that the service can continue to operate. ● If the decision is made not to invoke the plan, continue to monitor the situation until such time as normal service is resumed..
Enter specific actions or considerations if the disruption is due to non availability of Staff	<ul style="list-style-type: none"> ● Change of job functions for some staff (to support the business priorities) ● Employ agency staff ● Offer overtime ● Consider outsourcing some services if possible until you are ready to restore and deliver them yourselves.

Other resources

Objective	Actions or Considerations
Confirm the nature of the disruption.	<ul style="list-style-type: none">● What has happened?● When did it occur?● Which systems and/or services are affected?● How potentially serious is it?● What is the estimated duration of the problem?● Who else has been informed (staff/ suppliers / customers)?
Decide whether to invoke Business Continuity plan.	<ul style="list-style-type: none">● The decision will be based upon the information provided consideration should be given to:● How long resources will be unavailable?● Whether the resources affected are required to support the business priorities?● Whether the area is currently responding to an external incident?● Inform staff that the Business Continuity Plan is being invoked or put staff on standby or invoke agreed manual systems to ensure that the service can continue to operate.● If the decision is made not to invoke the plan, continue to monitor the situation until such time as normal service is resumed.
Enter specific actions or considerations if the disruption is due to non availability of IT systems or Data.	<ul style="list-style-type: none">● Arrangements/contracts to hire / borrow / purchase replacement resources from suppliers.● Protective measures for resources e.g. not having all resources at one site/shop/office.● Planning for loss of power for up to 2 days.● Plan for fuel supply interruption.● Planning for disruption to key water utilities.

PR issue

Objective	Actions or Considerations
Confirm the nature of the disruption.	<ul style="list-style-type: none"> ● What has happened? ● Where did it occur (online, social media, print etc) ● Which brands, systems or services are affected? ● How potentially serious is it? ● Who else has been informed (staff/ suppliers / customers)?
Decide whether to invoke Business Continuity plan.	<ul style="list-style-type: none"> ● The decision will be based upon the information provided consideration should be given to: ● How potentially serious is it? ● Whether the issue affects the business priorities ● Inform staff that the Business Continuity Plan is being invoked or put staff on standby. ● If the decision is made not to invoke the plan, continue to monitor the situation until such time as the issue is resolved.
Enter specific actions or considerations if the disruption is due to a PR issue.	<ul style="list-style-type: none"> ● Enquiries should be escalated to General Manager or in GM's absence a Team Leader ● The primary contact will be Josiah Dunmore ● GW doesn't comment on the suitability or conduct of cause/charities activities (see Appendix 3: Response to PR issues) ● Complaints regarding Lottery Plus lotteries should be shared with the Account Manager and reported back to the client.

Appendix 3: Response to PR issues

Complaint regarding the ethics/conduct of a cause or operator with a Small Society Lottery Licence
<ul style="list-style-type: none">● Example response: "Gatherwell is an External Lottery Manager and is licensed by the Gambling Commission. Gatherwell does not make judgements on the suitability of any organisation to operate a lottery. This decision is taken by the relevant licensing body. The licensing body for Small Society Lotteries is the local authority for the area in which the head office of the organisation is located. Gatherwell adheres to all decisions taken by the relevant local authority on matter relating to licensing."
Complaint regarding the ethics/conduct of a cause or operator with a Gambling Commission Licence
<ul style="list-style-type: none">● Example response: "Gatherwell is an External Lottery Manager and is licensed by the Gambling Commission. Gatherwell does not make judgements on the suitability of any organisation to operate a lottery. This decision is taken by the relevant licensing body, in this case, the Gambling Commission. Gatherwell adheres to all decisions taken by the Gambling Commission on matters relating to licensing."
Negative Facebook post/comment
<ul style="list-style-type: none">● Page admin to hide any comments of a dramatic or damaging nature● Page admin to delete the post that generated problem comments if deemed necessary● Issue to be reported to General Manager or in GM's absence Team Leader● Example responses above may be used in response to direct messages
Negative press
<ul style="list-style-type: none">● Negative press articles be reported to General Manager or in GM's absence Team Leader● If necessary a tailored response may be drafted and issued to the appropriate channel with approval from the General Manager, Group Marketing, Investor Relations and Group Legal.● If negative press is likely to have an adverse impact on the reputation of the Jumbo Interactive group as a whole, this should be escalated to Jumbo's Senior Leadership Group to coordinate our response. Such press may include, for example, articles published by national press with a large audience.

Appendix 4: Important contact information

If there is a business disruption or emergency, call the main Gatherwell number on 01865 582482. Please note that this telephone number is only available during normal business hours of 9:00-17:30, however an answerphone is available 24 hours a day.

Gatherwell personnel contact list

Name	Role	Office Number	Mobile Contact	Email Address
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Key supplier contact list

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]