

## Crisis Management Policy

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Relevant related GEMS policies:	Safeguarding Policy POLHR008 Code of Conduct POLCOM007 Whistleblowing Policy Data Protection and Privacy Policy
Other relevant documents:	Emergency Response and Disaster Recovery Plans Secure Information Sharing Guide Guides for Schools on Communications

## 1. Policy Scope and Purpose

- 1.1 Crisis Management Policy is the overarching document that outlines the guidelines and references for managing various types of disruptive events (such as incidents, accidents, potential crises, or business interruptions) across schools, service entities, and SSC offices
- 1.2 This document outlines the crisis response structure, roles, responsibilities and operating procedures for effective crisis management at GEMS Schools, services and SSC.
- 1.3 The management of incident is the responsibility of the first line of defence (Schools, Business Units, and Departments). However, this policy defines the support framework provided by the SSC and the designated Crisis Management Organization to ensure effective management of a potential crisis.
- 1.4. This policy applies to GEMS TopCo Limited (the "Company" or GEMS) and its subsidiaries and subsidiary undertakings (together with the Company, the "**Group**", and any of them, a "**Group Company**"), which includes:
  - All individuals working at all levels and grades, including all teaching staff, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, casual workers and agency staff, of GEMS, wherever located; and
  - All of those who represent GEMS in any capacity, including agents, sponsors, intermediaries, representatives and finders and introducers.
- 1.5. The Crisis Management Policy ("the CMP") applies to incidents that prompt the activation of the Bronze (Emergency Response Team), Silver (Crisis Coordination) and, if critical the Gold (Crisis Management) Teams to lead, support and guide in the management of a crisis affecting GEMS schools, services and SSC.
- 1.6. The policy takes a team approach to emergency response, with each team member given specific roles and responsibilities for responding on site to an emergency. It also emphasizes on the crisis reporting channels from the Bronze Team to a higher level and escalation to the Gold Team in case of a declaration of a crisis.

## 2. Definitions

- 2.1. Incident: An unlikely situation or circumstance which may result in injury, loss of life, destruction of property, or cause the interference, loss, or disruption of an organization's normal business operations to such an extent that it poses a threat.
- 2.2. A **crisis** is a significant event or situation that threatens the organization's reputation, operations, or stakeholders and requires strategic decision-making to mitigate its impact, while an **emergency** is an immediate, unexpected event that may lead to a direct threat to safety or property and requires swift, tactical responses to contain or resolve it. Emergencies have the potential to escalate into crises if not managed effectively.
- 2.3. Emergency Response Plans: A documented list of activities to commence immediately to prevent the loss of life and minimize injury and property damage  
Note: Every School and Service Entity will have their own Emergency Response document.

- 2.4. Crisis Management Policy: A high-level overarching document containing guidelines for dealing and managing crises. Emergency Response Plans are specifically tailored to address emergencies, while Crisis Management Policy is formulated to manage crises effectively.
- 2.5. Crisis Communication: The strategic process of delivering accurate, timely, and consistent information to internal and external stakeholders during a crisis to effectively manage the perceptions, minimize impact, maintain trust and protect GEMS reputation. Crisis communication process and key elements are also addressed within this policy.

### 3. Central Policy Statements and Crisis Management Process Flow

- 3.1. Crisis Management plays a key role in making sure that the broad consequences of a serious incident are effectively recovered, managed and reported.

*Please refer to **Appendix A** for an illustrative representation of the Escalation of Incidents through the three layers (Bronze, Silver and Gold Teams).*

*Please refer to **Appendix B and C**, which provides the assigned team members.*

- 3.2. Any employee or any stakeholder who identifies a potential crisis must report it immediately to their line manager or HODs.
- 3.3. Company-wide reporting mechanisms will also be utilized to document the incident and maintain a comprehensive record, including relevant platforms like Guard for HSE and Safeguarding. As part of the standard reporting process, all incidents (including Level 1 and Level 2) occurring at schools, service entities, or SSC offices are routinely reported to the respective Silver Team member or central business units, even if they are managed locally and do not require further involvement
- 3.4. For all incidents incident reporting and escalation scale will be used as the primary guideline shown in **Appendix D**
- 3.5. **The process of crisis declaration and crisis activation will be as follows:**

3.5.1. Incident identification will take place at school premises, SSC units, or service entities. If the incident does not require declaration of a crisis, it will be managed by the local Emergency Response Teams in accordance with local emergency response and/or business continuity plans.

3.5.2. Should the situation require further escalation, Bronze Team members will assess the incident and as team leaders of bronze team, schools principals, relevant HODs or Service MDs will escalate it to the Silver Team as needed.

3.5.3. If the situation surpasses local capabilities or has broader implications, the Silver Team will be activated.

- 3.6. Silver Team Lead then communicates the incident and gathers the entire Silver Team members for review and further action, if need be.
- 3.7. Silver Team Lead is responsible for deciding whether to escalate the incident to the Gold Team Lead or to push back if the event is deemed non-critical, based on the incident reporting and escalation scale matrix (**refer to Appendix D**). To facilitate real-time communication, a WhatsApp group will be created, including all Silver Team members, to share details about incidents, monitor progress, and discuss any potential escalation to the Gold Level. Once the incident is either resolved or escalated, the WhatsApp group will be deactivated after the incident has concluded.

Any decision taken must be supported by documented evidence, with formal sign-off from the respective stakeholders.

- 3.8. In the event of declaration of a crisis, the Silver Team Lead will contact and arrange a Crisis Management meeting, ensuring the crisis management process is well coordinated and followed effectively.
- 3.9. If the incident escalates into a full crisis, the Gold Team (executive-level response) is engaged. The GEMS CEO, as the Crisis Management Team (CMT) leader, will activate the crisis management process and oversee actions taken regarding crisis response. The situation should have at least one of below characteristics to be considered as a crisis;
  - The incident impacts or has the potential to impact multiple departments, schools, service businesses or other stakeholders.
  - The situation poses a significant risk to the safety, security, reputation, or operational continuity of the organization or public.
  - Emergency Response Plans are insufficient to manage the escalating situation because the incident has a broader impact both on tangible and intangible assets of the company
- 3.10. The CMT will determine roles and responsibilities, establish reporting requirements during crisis management, and decide on the appropriate communication strategy to be adapted. Additionally, the CMT will assess the situation and make the final decision on crisis deactivation once the situation is under control.

### **Crisis Communication**

- 3.11. Crisis communication will be conducted through channels approved by CMT. Main objectives for crisis communications are:
  - 3.11.1. Ensure clear and timely communication to internal and external stakeholders.
  - 3.11.2. Maintain trust, transparency, and credibility in crisis situations.
  - 3.11.3. Minimize misinformation, speculation, and reputational damage.
  - 3.11.4. Provide guidance and reassurance to employees, students, parents, and the wider community.
  - 3.11.5. Align all messaging with GEMS' legal, ethical, and regulatory requirements.
- 3.12. The Communications function will be responsible for both internal and external communications of the Company's response to the crisis that have been pre-approved by the CMT. It also has the responsibility to advise the CMT on the appropriate communications strategy and tactics in response to a crisis.
- 3.13. Internal stakeholders, including employees, school principals and leadership, and the executive management and board, will receive communication through key channels such as the People and Organization team, the Crisis Management Team, the CEO, and the Executive Team.
- 3.14. External stakeholders, including parents and students, government and regulatory bodies such as KHDA, MOE, DHA, and the police, as well as media representatives, will be engaged through designated communication channels managed by school

principals, Government Relations Executives (GREs), and the Communications Team which will be guided by Crisis Management Team.

- 3.15. During a crisis, only designated company spokespersons are permitted to make public statements or respond to media inquiries. Unauthorized employees must refrain from sharing any information.
- 3.16. All crisis-related communications, whether internal or external, must align with existing company policies, including but not limited to Safeguarding Policy, Data Protection and Privacy Policy, Policy on Communicating with Regulatory and Government Bodies etc.
- 3.17. Employees must not disclose confidential or sensitive information regarding the incident, including student or staff details, financial data, or security measures, to unauthorized parties.
- 3.18. No employee is permitted to post, comment on, or share any information regarding the crisis on social media platforms. This includes personal accounts, company-affiliated pages, and any digital communication channels.
- 3.19. All crisis-related communications must be fact-checked and approved by the Crisis Management Team (CMT) to ensure accuracy, consistency, and appropriateness before dissemination.
- 3.20. Communication with parents, students, government authorities, and other stakeholders will be conducted through official company channels and must be pre-approved by the relevant departments, including the Communications Team, Government Relations, and Legal.
- 3.21. The company will use predetermined communication channels such as official emails, press releases, SMS alerts, internal memos, and designated spokesperson briefings to provide crisis-related information to related parties. Where appropriate, additional channels such as the company's website (e.g. a news banner or dedicated crisis update page), automated phone hotlines, or press conferences (for major crises) may be used. i.e. a press conference for a significant incident. No other channels or personal accounts are permitted for official crisis-related information.
- 3.22. The Crisis Management Team will determine the official deactivation of crisis communications and ensure a structured post-crisis debrief to assess communication effectiveness and improvements for future incidents.

## 4. Roles & Responsibilities

### **Bronze Team (First Responders)**

- 4.1. The Bronze Team consists of school principals, relevant Services Managing Directors (MDs), department heads in SSC (HoDs), who are also designated emergency response coordinators, and key operational staff responsible for managing incidents at the ground level.
- 4.2. This team is the first line of response, ensuring immediate action is taken to contain and mitigate the impact of an incident before escalation, if necessary.
- 4.3. Team responsibilities include:
  - Assessing and reporting incidents as per the defined protocols.

- Executing emergency response plans to manage on-ground situations.
  - Ensuring safety protocols are followed to protect students, staff, and facilities.
  - Coordinating with local authorities (such as police, fire department, and emergency medical services) when needed.
- 4.4. Please refer to the Emergency Response Plans respective to the emergency area for more details on roles and responsibilities and the emergency response process flow.

#### **Silver Team (or Crisis Coordination Team (CCT))**

- 4.5. Team consisting of crisis areas specialist as key role players (i.e., Communication, HSE, Safeguarding, Government Relations) and the appropriate stakeholders responsible for coordinating and assessing the incidents.
- 4.6. Responsible for assessing and classifying the incidents reported by the Bronze Team; and
- Reviewing and validating incident reports from the Bronze Team.
  - Assessing the severity of an incident and determining whether escalation to the Gold Team is required.
  - Providing tactical guidance to the Bronze Team for incident resolution.
  - Ensuring compliance with organizational policies (such as Safeguarding, Health & Safety etc.).
  - Coordinating with external agencies and authorities as needed.
- 4.7. Conducting serious case reviews, post-incident debriefs and recommending process improvement, training schools and Business Units on the ERPs and updating the plans.

#### **Gold Team (or Crisis Management Team (CMT))**

- 4.8. Team consisting of high level executives (Excom members, other specialists, Silver Team Lead) and other stakeholders called as required;
- 4.9. This team is responsible for executing the strategic response for incidents that have escalated into fully-fledged crises and also;
- Approving strategic decisions, including school closures, ceasing operations, regulatory responses, and major operational adjustments.
  - Coordinating with regulatory authorities (e.g., KHDA, MOE, DHA, and Police) to secure necessary approvals.
  - Overseeing internal and external crisis communication to ensure a unified message aligned with corporate policies.
  - Allocating additional resources to support the Silver and Bronze Teams on ground by providing all needed resources and directions during the course of the crisis. They ensure that the Bronze Team has the tools and authority to manage the incident effectively on the ground and coordinate between the operational and strategic levels.

- Engaging with key stakeholders, including parents, media, and government entities, to manage reputational risks.

**All employees**

All employees are responsible for:

- 4.10. Acting immediately according to the Emergency Response Plan (ERP) and prioritizing safety, without delaying reporting or attempting to handle major incidents alone.
- 4.11. Reporting incidents accurately through designated channels and cooperating with emergency services and internal teams, avoiding sharing unverified information with staff, students, parents, suppliers, or the public, or bypassing protocols.
- 4.12. Actively supporting the crisis management teams in gathering, documenting, and disseminating accurate data throughout the response and recovery stages, ensuring all relevant information is shared promptly and transparently.

**Enterprise Risk Management**

Risk Management Department is responsible for;

- 4.13. Ensuring the Crisis Management Policy is well-defined, up to date, and aligned with industry best practices and regulatory requirements.
- 4.14. Identifying potential crisis scenarios and assessing their impact on the organization, schools, and business units.
- 4.15. Ensuring alignment with other organizational policies, such as Business Continuity, Health & Safety, Safeguarding, IT Security, and Communications Policies etc.
- 4.16. Facilitating communication and effective collaboration between schools, business units, and senior leadership to ensure a cohesive crisis response strategy

**5. Staff Awareness and Training**

- 5.2. The Group will make this policy available on the Company's intranet for all Personnel.
- 5.3. Any technical training or certification required by company-wide or country-specific regulations must be provided to those who are subject to it. The SSC HSE teams will provide the required information or updates on mandatory training requirements.
- 5.4. People and Organization and HR partners at schools are responsible for providing necessary training to the Emergency Response Teams in accordance. (please see related Emergency Response Plans)

## 6. Breach of the Policy

### Obligation to report non-compliance with this policy

- 6.1 All Personnel who suspect or become aware of any non-compliance with this policy have an obligation to report this promptly. Reporting can be made via the following routes:
- for GEMS Personnel, to the respective line manager;
  - to the Compliance Department (compliance@gemseducation.com); or
  - through the Group's anonymous whistle-blower hotline (contact details provided below), in accordance with the Group's **Whistle-blowing Policy POL/HR0014**.

Channel	Contact details
Toll free number	8 00 032 0827 (UAE) / 00800 100 702 (Qatar)
Email address	report@speak-safe.com
Website	<a href="http://speaksafe.whispli.com/kpmg">http://speaksafe.whispli.com/kpmg</a>
Surface mail	Speak-Safe Whistleblower Mailbox, P.O. Box 3800, Dubai

### Investigation of reports of non-compliance

- 6.2 Reported allegations of non-compliance with this policy will be considered and, if appropriate, investigated by the Company.
- 6.3 Unless otherwise directed by the GEMS Board or Board Risk & Audit Committee, the Chief Risk and Assurance Officer (in conjunction with the Internal audit department, legal department or any other department, as required) is responsible for initiating and overseeing any investigation into reports of non-compliance with this policy.
- 6.4 GEMS Internal Audit Department shall, at periodic intervals, make arrangements for an audit of compliance with the internal control systems and procedures governed by this policy. The results of such audits / test/ simulation exercises shall be reported to the Board Risk & Audit Committee on effectiveness of response protocols and alignment with the Crisis Management Policy.
- 6.5 Questions related to this policy could be directed to the Risk Management Department ([riskmanagement@gemseducation.com](mailto:riskmanagement@gemseducation.com)).

**8. Appendices**

**Appendix A. Escalation of Incidents across the Three Levels of Crisis Management**

	Board Risk & Audit Committee	Description	Team Lead	Team Members /	Plans / Guidelines
Escalation Level ↑	<b>Gold Team</b>	Senior Executives who are responsible for the strategic management of the incident when a crisis is declared	Chief Risk and Assurance Officer (CRAO)	CEO and Deputy CEO COO CEdO CRAO Relevant Silver Team members (SVP Legal, SVP People and Org. etc)	Crisis Management Policy
	<b>Silver Team</b>	Team responsible to coordinate, manage and act as liaison between Bronze and Gold teams; and ultimately responsible to declare incident as crisis	Head of Health and Safety	Head of HSE VP Safeguarding and CP SVP Legal SVP People and Organization SVP Government Relations VP Communications VP Info Security Relevant Education SVP(s)	Specialized SOPs (e.g., Child Safeguarding Crisis Plan, Parent Communication Plan)
	<b>Bronze Team</b>	Team who is the first responder on the scene; i.e. School level responders	Team Lead defined in the School ERP (e.g. School Principal in most cases) – deputy identified in ERP	School Principals (Lead Point of Contact) Relevant Services MDs Relevant SSC HoDs	Emergency Response Plans (ERP)

**Team Lead:** Responsibilities are to act as a focal point of contact between different team levels, gather their team in case the incident justifies the need and transfer incident management responsibility according to the speciality area (e.g. Child Safeguarding incidents).

**Team Members Involved:** Requested by the Team Lead to provide support.

**Additional Team Members Informed:** Members other than the ones assigned for the incident level. Informed and updated and if necessary for advice/ recommendations. If a team member is unavailable, approval will be obtained from their respective manager within the team.

**Appendix B. Silver Team Members**

Role	
<b>Silver Team Members</b>	Head of HSE (Silver Team Lead)
	Chief Risk and Assurance Officer
	VP - Safeguarding and Child Protection
	SVP - Security / Government Relations
	VP - Information Security
	CCO - Communications
	SVP - People and Organisation

**Appendix C. Gold Team Members**

Role	
<b>Gold Team Members</b>	CRAO (Gold Team Lead)
	CEO
	Deputy CEO
	COO
	CEdO
	CFO
	CCO
	SVP- Legal
	SVP- Information Technologies
	SVP – People and Organization
	SVP - Government Relations
	Other Relevant Silver Team Members

### Appendix D. GEMS Incident Reporting and Escalation Scale

Definitons	Incident Criticality Level	Incident Descriptor	Health And Safety	Communications	Safeguarding	Others	
A major and serious incident with severe organizational impact, requiring executive intervention and strategic decision-making	Gold Level	1	Matter with public interest, major Incident	- Single or multiple fatalities - Major injury requiring hospitalization - Permanent injury	- An incident that sparks media interest and/or cases that concern the entire community (e.g., death, terror threat, fire, sexual harassment, large-scale outbreak of illness, significant public scandal.)	- Safeguarding incident leading to a catastrophic impact on brand reputation including allegations against members of GEMS staff, volunteers or services.	- Any incident relating to fraud, corruption or bribery - Law enforcement investigation into possible criminal activity at school - Financial crisis or significant financial mismanagement affecting GEMS
A significant incident disrupting operations but manageable without executive involvement, requiring coordinated response		2	Matter not affecting public interest or significant Incident	- Injury requiring external medical treatment - Non-permanent injury	- An incident that affects the school and the school community (e.g., school closure, sudden departure of a principal/key staff, injury at school etc.)	- Safeguarding incident that requires external agency reporting and notification to the GEMS Central Safeguarding Team (CST).	- Any other incident that is notifiable to a Regulator and is not criticality level 1. (e.g., environmental hazard, regulatory non-compliance that does not have public consequence)
Locally managed incidents at schools, services, or SSC with the potential to escalate into a more critical situation.	Bronze Level	3	Incident	- Minor injury that does not require any external medical treatment	- An Incident that impacts students and/or staff that can damage the school's reputation or GEMS brand if not managed well.	- Safeguarding incident that is reported, investigated and managed by the school, that warrants only limited GEMS involvement from the CST.	- Information security breach affecting company information / property which could disrupt our ability to function. (e.g., unauthorized access to non-sensitive data, localized system failures)
		4	Anomaly	- Near miss incident	- An incident that could hurt the school brand and GEMS reputation (e.g., Inappropriate material, minor accident, bullying etc.)	- Safeguarding incident that is reported, investigated and managed by the school, with no further actions being required and does not warrant involvement of the CST.	- Information security breach or weakness which has minimal impact to GEMS and recovery can be scheduled to an appropriate time without negatively impacting the business function. (e.g., unauthorized login attempts, minor system vulnerability)