

Information Security Policy

Version 2.0

July 2022

Version Control

| Version | Owner | Reviewer | Changes | Approval date | Next Review |
|---------|---------------|----------------|--|---------------|-------------|
| 1.0 | Michael Walsh | Mashudul Karim | Initial version or first version uploaded on portal - see ESG share for historical information | 07/2021 | 10/2023 |
| 2.0 | Michael Walsh | Mashudul Karim | Annual review. Changed 'IT department' to 'Newable Digital Service Desk'. | 07/2022 | 10/2023 |

Background

The purpose of this document is to establish and articulate formally the information security policy of Newable and its constituent business areas, which governs the use of all information and communications technology resources available on the Newable technology platform.

Information and communications technology resources play an important role and are often fundamental to ensuring that the business continues to innovate and develop its products and services. However, a cyber-security event could take advantage of these resources and cause disruption or reputational damage.

Newable as a business has determined that it has a low appetite for operational risk and has, through its Risk and Governance Committee, communicated this clearly in a Risk Appetite Statement. In line with this and in order to maintain operational risk at an acceptable level, it is important that information and communications technology resources are secured effectively and operate normally (within expected specifications) at all times.

This policy applies to all users regardless of whether they are permanent or temporary employees or consultants working on behalf of the business. Failure to comply with this policy and the procedures outlined herein may result in disciplinary or legal action.

This policy also applies to all information and communications technology resources, which together comprise the Newable technology platform regardless of their location (on-premises or hosted by a third party), type (virtual or physical) or purpose.

The Newable Cyber Security Committee is responsible for communicating this policy to the wider business and reviewing it once a year (with additional reviews whenever there is a substantial or material change within the business or the threat landscape).

Principles

Newable provides suitable information and communications technology to promote efficient business activity. These resources represent a considerable investment and commitment by the business and remain its property.

If used inappropriately, information and communications technology can cause damage to businesses and individuals, which may result in legal action. Users of such resources should therefore do so for legitimate business purposes, in a professional manner and at all times.

Newable has the facility and reserves the right to monitor and investigate use of its information and communications technology in accordance with the principles of this policy. Any breach of this policy may result in disciplinary action up to and including dismissal for gross misconduct.

Policy Passwords

1. You are responsible for safeguarding your user credentials (usernames and passwords) at all times and must keep them confidential and change them regularly
2. Do not print your user credentials, store them or give them to others
3. Newable recommends (and where possible enforces) passwords with:
 - a minimum length of 8 characters;
 - a combination of uppercase, lowercase and non-alphanumeric characters and numbers;
 - a maximum age of 90 days;
 - a minimum age of 1 day; and
 - no reuse within 24 cycles
4. You are responsible for all transactions made using your credentials and you must not use another user's credentials
5. When leaving your computer or device unattended or on leaving the office, you must lock your computer or device or log off to prevent unauthorised users using them in your absence

Privacy and monitoring

1. Passwords and encryption of files or messages do not ensure privacy
2. Newable has the facility and reserves the right to access all material stored on its systems regardless of encoding or protection and can legally monitor your use of telecommunications, the internet, web, email or fax if the monitoring relates to the business and the equipment is partly or wholly for business purposes
3. You should bear in mind that these circumstances cover almost every situation where Newable might want to monitor your usage of its systems
4. If you have private information that you do not wish Newable or other employees of the business to see, you should not store it on Newable's systems
5. Newable will make reasonable efforts to inform you that your communications will be monitored but it does not need your consent where the monitoring is for one of the following reasons:
 - To establish facts relevant to the business, check that procedures are being followed or check standards are being met (e.g., listening to phone calls to assess the quality of your work)
 - To prevent or detect crime
 - To check for unauthorised use of telecommunications systems such as whether you are using the internet or email for non-business purposes
 - To make sure electronic systems are operating effectively or protect them from a threat (e.g., prevent computer viruses)

- To check whether a communication you have received (e.g., email or telephone call) is relevant to the business, in which case it can open emails or listen to voicemails but cannot record your telephone calls
 - To check calls to confidential helplines, in which case it can listen to telephone calls but cannot record them
 - National security
6. You should not have any expectation of privacy in respect of your usage of information and communications technology provided to you for business purposes by Newable and should refer to the Data Protection Policy for retention of information relating to personal data
 7. If you breach any of the guidelines in this policy you may be subject to disciplinary action up to and including summary dismissal for gross misconduct

Personal use of company property

1. Newable accepts that you may on occasion make personal use of its information and communications technology resources
2. Limited personal use of these resources is permitted provided that it does not unduly interrupt the working day
3. Limited personal use of Newable's information and communications technology resources should be limited to breaks and outside working hours
4. Excessive personal use of Newable's information and communications technology resources may lead to disciplinary action
5. In addition to the above general restrictions on the personal use of information and communications technology, the following restrictions apply to laptops and other portable computing devices:
 - You must not install software for home internet connections without the approval and assistance of the Newable Digital Service Desk and it may not approve certain software due to known or unresolved issues
 - You must not install software for personal computer equipment or peripheral devices such as printers, scanners or cameras without the approval and assistance of the Newable Digital Service Desk and it may not approve certain software due to known or unresolved issues
 - You must not store large amounts of personal files on laptops and other portable computing devices issued to you by Newable

Physical security of company property

1. Newable may provide you with company property such as a computer or mobile phone for business purposes
2. You must take reasonable care of any company property while it is in your possession

3. If you fail take reasonable care of any company property or are negligent or maliciously damage such property, you may be liable for the cost of replacement or repair and subject to disciplinary action
4. You must take reasonable precautions for the physical security of any portable equipment in your possession such as a laptop, mobile phone, camera or projector
5. You must not make personal use of company property without the express permission of your line manager or as provided for elsewhere in this policy
6. When you are away from the office, any company property in your possession should remain under your direct control at all times or out of sight in a secure location
7. You should not leave any company property on display within a car at any time and you may face disciplinary action if you fail to adhere to this requirement

New hardware, software or services

1. The Newable Digital Service Desk has sole authority to approve, procure, deploy and manage hardware, software and services on behalf of Newable and its constituent business areas
2. Unapproved hardware, software or services may have unsuitable or ambiguous licence agreements, be of questionable quality, cause system instability, or be incompatible with Newable's technology platform
3. Newable has the facility and reserves the right to search for unapproved hardware, software and services on a regular basis
4. If you install hardware, software or services without the approval or assistance of the Newable Digital Service Desk, you may be subject to disciplinary action

Email

1. Newable provides email services for business purposes
2. You may not use Newable's email services to operate a personal business or activity intended to achieve personal financial gain
3. You may not use Newable's email services or other communications services for disseminating or storing commercial or personal advertisements, solicitations, promotions, political material, campaigns or any other unauthorised material
4. You may not enter into personal commitments or commitments on behalf of the business without having received prior permission in writing to do so from your line manager or if this is formally a part of your normal job at Newable
5. Every email sent within or beyond the Newable network is a legal document and a formal communication from the business
6. Every email sent within or beyond the Newable network will identify you and the business as the sender
7. Emails could be disclosed as evidence in court or as part of an investigation by the business or an external body

8. The content of emails may be prejudicial to you or Newable or create a liability for you or Newable
9. The content of emails will reflect on Newable's image and reputation and your own image and reputation with clients, suppliers and customers
10. Newable has the facility and reserves the right to monitor the content of all emails sent and received and may make hard copies of emails, take backups and otherwise retain records of emails even when these have been deleted from the system
11. Use email professionally, namely:
 - Never use email in a way that could bring Newable into disrepute or be commercially damaging to the business
 - Use your judgment in deciding whether email is the most appropriate form of communication and do not use it as a replacement for conversations and meetings
 - Compose emails as professionally as if you were composing a letter for a client, customer or supplier
12. Consider carefully the confidentiality of emails at all times, namely:
 - All emails must contain an appropriate confidentiality notice
 - Do not send any information that is confidential or sensitive via email if there is a more secure means of communication
 - For particularly important emails, request a receipt and retain a hard copy
 - Ensure that you have the correct email address for the intended recipients because emails may be misdirected or intercepted by third parties
 - If you are unsure of the correct address, avoid sending the email and use an alternative means of communication
 - If you misdirect an email, contact the Newable Digital Service Desk immediately on becoming aware of your mistake
13. Consider carefully the size of emails and the number of recipients, namely:
 - Keep emails and the number of recipients as small as possible to keep network traffic to a minimum and seek advice from the Newable Digital Service Desk where necessary
 - When sending emails to a distribution group containing all or a large number of staff, assess carefully whether the email needs to include all of the recipients or if it would be appropriate to use an alternative means of communication such as the Newable Intranet
 - Do not use email and specifically email distribution groups to disseminate information for non-business purposes to a large number of staff, except for the specific purpose of raising awareness of charity fundraising initiatives with which you are directly involved
 - When sending emails to members of staff who are travelling remember that they may have to use slower or less reliable communications networks
 - Consider compression software if you need to send large files and seek advice from the Newable Digital Service Desk where necessary
14. Avoid harassment or discrimination, namely:

- Ensure that the content of emails is neither offensive nor abusive and always complies with Newable's Equality and Diversity and Anti-Harassment and Bullying policies
 - Remember that sending and receiving obscene or pornographic or other offensive material will result in disciplinary action and may constitute an offence resulting in criminal liability
 - Remember that it is completely unacceptable for you to send jokes via internal or external email
15. Do not transmit material subject to copyright or containing offensive or derogatory material via email, namely:
 - Anything damaging to Newable's reputation
 - Anything that makes unauthorised representations or which expresses opinions incorrectly
 - Anything that is illegal, racist, homophobic, sexist, defamatory, pornographic
 - Anything that is inappropriate or could cause distress or amount to harassment
 16. Beware of opening attachments in emails from unknown sources in case they contain computer viruses and seek advice from the Newable Digital Service Desk if in any doubt
 17. Never forward chain emails or junk emails
 18. Report any unverified virus or security warnings received by email to the Newable Digital Service Desk and do not forward them to anyone else
 19. Use of personal email services via Newable's technology platform should be kept to a minimum and any emails sent should comply with the guidelines in this policy as if they were sent via Newable's email services

Internet and web

1. Newable provides internet and web access for business purposes
2. You may access the internet and web from a Newable office, computer or device only via a method approved by the Newable Digital Service Desk
3. Consider carefully how you connect to the internet or web, namely:
 - In the case of using a wireless connection, you must ensure that there is at least a basic level of security for the connection and seek advice from the Newable Digital Service Desk where necessary
 - Never connect to a wireless network that has open authentication or one that does not ask for a password
4. When accessing the internet and web using a Newable computer or device, you are representing the business and may be legally liable for your conduct and for the content of any material you place on the internet and web
5. Newable has the facility and reserves the right to monitor internet and web access to ensure a consistent quality of service and to safeguard the availability and performance of business-critical systems, resources and network bandwidth

6. Newable monitors, controls, and where appropriate prevents access to certain resources or services to protect the business, its employees and its clients from security risks and threats, namely:
 - Sites with illegal or inappropriate content
 - Sites with streaming media facilities
 - Protocols known to be exploited for bandwidth-hungry, illegal or malicious content, applications or services
 - Executable files
 - Instant messaging systems
 - Peer-to-peer or other file-sharing systems
7. In some business areas, specific rules apply in respect of online content representing Newable and you should always seek advice from your line manager before making such representations
8. You must exercise extreme caution when downloading, transmitting or copying information from the internet or web, namely:
 - You must only download information required for business purposes
 - You must consider carefully the amount of data you are downloading, transmitting or copying since you may add to network congestion
 - You must consult the Newable Digital Service Desk before downloading any software or executable files since they may contain viruses
 - You may not have the consent of the copyright owner and doing so may constitute a breach of copyright
9. Newable permits the limited use of social networking sites during breaks and outside working hours with the prior consent of your line manager but abuse of this policy could result in disciplinary action

Telecommunications

1. Newable provides landline telephones and mobiles for business purposes
2. Newable accepts that you may on occasion need to make or receive personal telephone calls
3. You must exercise reasonable restraint in your personal use of these resources and restrict this to breaks and outside working hours
4. Newable may list your direct landline number and/or your business mobile number to the foot of every email
5. Consider carefully how you use a mobile phone, namely:
 - All mobile phones should be set to silent or vibrate when in the office environment
 - For the company policy on using a mobile phone whilst driving, please see the Driving on Business Policy
 - As with all personal calls, you should keep personal mobile phone calls at work to a minimum

- You should keep texting and accessing the internet and social media from a mobile phone to a minimum during working hours
 - You should not send any offensive message or content using a company mobile phone at any time or a personal mobile phone while at work and doing so may result in disciplinary action
 - You should be aware of the Health and Safety at Work Act 1974
6. Newable monitors, controls, and where appropriate prevents access to certain resources or services to protect the business, its employees and its clients from security risks and threats, namely:
- The IT and finance departments monitor the use of voice, text and data allowances
 - You must notify your line manager if you anticipate a higher than usual level of usage and provide a business justification for this
 - The business may undertake an investigation if bills are excessive and there is no satisfactory explanation

Social media

1. Newable supports the use of social media as an effective communication tool but recognises that it can create a significant impact on organisational and professional reputations
2. You must never use social media in a way that could bring Newable into disrepute or cause commercial damage to the business, its employees or its clients
3. This applies to all forms of social media and social media sites including (but not limited to) Facebook, Twitter, LinkedIn and YouTube as well as blogs or wikis created for both business and personal use
4. Consider carefully how you use social media for business reasons, namely:
 - If you comment on any aspect of the business, you must identify yourself clearly as an employee and include a disclaimer
 - Your posting should not disclose any information that is confidential or proprietary to Newable or any third party
 - Your posting should not include Newable's logos or trademarks unless you have gained prior permission from the communications department
 - If you are unsure about how to respond to a public comment or you would like to use social media to promote a service, you should seek advice from the communications department
5. Consider carefully how you use social media for personal reasons, namely:
 - If you find yourself a victim of abuse, harassment or bullying via social media, please refer to the Anti-harassment and Bullying Policy
 - If you misuse social media to the detriment of Newable, its employees or its clients, you may be subject to disciplinary action up to and including dismissal for gross misconduct