



Information Security Policy

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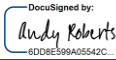
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1.1	11/06/2024	S Cottle - SCO	Annual review as part of ISMS

Distribution

NAME	TITLE
All Sabio Staff on Sabio Intranet	Sabio Group Information Security Policy

Approval

NAME	POSITION	SIGNATURE	DATE
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Information Security Policy

1 Introduction

This document defines the information security policy of Sabio Group.

As a modern, forward-looking business, Sabio Group recognises at senior levels the need to ensure that its business operates smoothly and without interruption for the benefit of its customers, shareholders and other stakeholders.

In order to provide such a level of continuous operation, Sabio Group has implemented an Information Security Management System (ISMS) in line with the International Standard for Information Security, ISO/IEC 27001. This standard defines the requirements for an ISMS based on internationally recognised best practice.

The operation of the ISMS has many benefits for the business, including:

- Protection of revenue streams and company profitability
- Ensuring the supply of goods and services to customers
- Maintenance and enhancement of shareholder value
- Compliance with legal and regulatory requirements
- Staff and Contractor awareness of Information Security responsibilities

Sabio Group has decided to maintain full certification to ISO/IEC 27001 in order that the effective adoption of information security best practice may be validated by an independent third party, the British Standards Institute (BSI) a Registered Certification Body (RCB).

This policy applies to all systems, people and processes that constitute the organization's information systems, including board members, directors, employees, contractors, suppliers and other third parties who have access to Sabio Group systems.

The following supporting documents are relevant to this information security policy and provide additional information about how it is applied:

- Acceptable Use Policy
- Access Control Policy
- Anti-Malware Policy
- Asset Management Policy
- Availability Management Policy
- Backup Policy
- BYOD Policy
- CCTV Policy
- Clear Desk and Clear Screen Policy
- Cloud Services Policy
- Configuration Management Policy
- Cryptographic Policy
- Data Leakage Prevention Policy

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- Data Masking Policy
- Dynamic Access Control Policy
- Electronic Messaging Policy □ HR Security Policy
- Information Deletion Policy
- Information Security Policy for Supplier Relationships
- Information Security Whistleblowing Policy
- Internet Access Policy
- IP and Copyright Compliance Policy
- Logging and Monitoring Policy
- Mobile Device Policy
- Monitoring Policy
- Network Security Policy
- Online Collaboration Policy
- Physical Security Policy
- Privacy and Personal Data Protection Policy
- Records Retention and Protection Policy
- Remote Working Policy
- Risk Assessment and Treatment Process
- Secure Coding Policy
- Secure Development Policy
- Social Media Policy
- Software Policy
- Statement of Applicability
- Supplier Information Security Evaluation Process
- Technical Vulnerability Management Policy
- Threat Intelligence Policy
- User Access Management Process
- Web Filtering Policy

Details of the latest version number of each of these documents is available from the ISMS Documentation Log and who is responsible for updating them.

2 Information security policy

2.1 Information security requirements

A clear definition of the requirements for information security within Sabio Group will be agreed and maintained with the internal business so that all ISMS activity is focussed on the fulfilment of those requirements. Statutory, regulatory and contractual requirements will also be documented and input to the planning process. Specific requirements about the security of new or changed systems or services will be captured as part of the design stage of each project.

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It is a fundamental principle of the Sabio Group Information Security Management System that the controls implemented are driven by business needs and this will be regularly communicated to all staff through team meetings and briefing documents.

2.2 Framework for setting objectives

A regular cycle will be used for the setting of objectives for information security, to coincide with the budget planning cycle. This will ensure that adequate funding is obtained for the improvement activities identified. These objectives will be based upon a clear understanding of the business requirements, informed by the management review process during which the views of relevant interested parties may be obtained.

Information security objectives will be documented for an agreed time period, together with details of how they will be achieved. These will be evaluated and monitored as part of management reviews to ensure that they remain valid. If amendments are required, these will be managed through the change management process.

In accordance with ISO/IEC 27001 the reference controls detailed in Annex A of the standard will be adopted where appropriate by Sabio Group. These will be reviewed on a regular basis in the light of the outcome from risk assessments and in line with information security risk treatment plans. For details of which Annex A controls have been implemented and which have been excluded please see the *Statement of Applicability*.

In addition, enhanced and additional controls from the following codes of practice will be adopted and implemented where appropriate:

- ISO/IEC 27002 – Code of practice for information security controls
- ISO/IEC 27017 – Code of practice for information security controls based on ISO/IEC 27002 for cloud services
- ISO/IEC 27018 – Code of practice for protection of personally identifiable information (PII) in public clouds acting as PII processors

The adoption of these codes of practice will provide additional assurance to our customers and help further with our compliance with international data protection legislation.

2.3 Continual improvement of the ISMS

Sabio Group policy regarding continual improvement is to:

- Continually improve the effectiveness of the ISMS
- Enhance current processes to bring them into line with good practice as defined within ISO/IEC 27001 and related standards

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- Achieve ISO/IEC 27001 certification and maintain it on an on-going basis
- Increase the level of proactivity (and the stakeholder perception of proactivity) with regard to information security
- Make information security processes and controls more measurable in order to provide a sound basis for informed decisions
- Review relevant metrics on an annual basis to assess whether it is appropriate to change them, based on collected historical data
- Obtain ideas for improvement via regular meetings and other forms of communication with interested parties
- Review ideas for improvement at regular management meetings in order to prioritise and assess timescales and benefits

Ideas for improvements may be obtained from any source including employees, customers, suppliers, IT staff, risk assessments and service reports. Once identified they will be recorded and evaluated as part of management reviews.

2.4 Information security policy areas

Sabio Group defines policy in a wide variety of information security-related areas which are described in detail in a comprehensive set of policy documentation that accompanies this overarching information security policy.

Each of these policies is defined and agreed by one or more people with competence in the relevant area and, once formally approved, is communicated to an appropriate audience, both within and external to, the organization.

The table below shows the individual policies within the documentation set and summarises each policy's content and the target audience of interested parties.

POLICY TITLE	AREAS ADDRESSED	TARGET AUDIENCE
Internet Access Policy	Business use of the Internet, personal use of the Internet, Internet account management, security and monitoring and prohibited uses of the Internet service.	Users of the Internet service
Cloud Computing Policy	Due diligence, signup, setup, management and removal of cloud computing services.	Employees involved in the procurement and management of cloud services
Mobile Device Policy	Care and security of mobile devices such as laptops, tablets and smartphones, whether provided by the organization for business use.	Users of company-provided mobile devices

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BYOD Policy	Bring Your Own Device (BYOD) considerations where personnel wish to make use of their own mobile devices to access corporate information.	Users of personal devices for restricted business use
Teleworking Policy	Information security considerations in establishing and running a teleworking site and arrangement e.g. physical security, insurance and equipment	Management and employees involved in setting up and maintaining a teleworking site
Access Control Policy	User registration and deregistration, provision of access rights, external access, access reviews, password policy, user responsibilities and system and application access control.	Employees involved in setting up and managing access control
Dynamic Access Control Policy	Applicability and use of dynamic access controls available in specific environments.	Asset owners and ICT team
Cryptographic Policy	Risk assessment, technique selection, deployment, testing and review of cryptography, and key management	Employees involved in setting up and managing the use of cryptographic technology and techniques
Physical Security Policy	Secure areas, paper and equipment security and equipment lifecycle management	All employees
Anti-Malware Policy	Firewalls, anti-virus, spam filtering, software installation and scanning, vulnerability management, user awareness training, threat monitoring and alerts, technical reviews and malware incident management.	All employees
Backup Policy	Backup cycles, cloud backups, off-site storage, documentation, recovery testing and protection of storage media	Employees responsible for designing and implementing backup regimes
Logging and Monitoring Policy	Settings for event collection. protection and review	Employees responsible for protecting the organization's infrastructure from attacks
Software Policy	Purchasing software, software registration, installation and removal, in-house software development and use of software in the cloud.	All employees
Technical Vulnerability Management Policy	Vulnerability definition, sources of information, patches and updates, vulnerability assessment, hardening, awareness training and vulnerability disclosure.	Employees responsible for protecting the organization's infrastructure from malware

POLICY TITLE	AREAS ADDRESSED	TARGET AUDIENCE
Network Security Policy	Network security design, including network segregation, perimeter security, wireless networks and remote access; network security management, including roles and responsibilities, logging and monitoring and changes.	Employees responsible for designing, implementing and managing networks

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Electronic Messaging Policy	Sending and receiving electronic messages, monitoring of electronic messaging facilities and use of email.	All employees
Online Collaboration Policy	Use of collaboration tools for communication, sharing and video conferencing.	All employees
Secure Development Policy	Business requirements specification, system design, development and testing and outsourced software development.	Employees responsible for designing, managing and writing code for bespoke software developments
Information Security Policy for Supplier Relationships	Due diligence, supplier agreements, monitoring and review of services, changes, disputes and end of contract.	Employees involved in setting up and managing supplier relationships
Availability Management Policy	Availability requirements and design, monitoring and reporting, non-availability, testing availability plans and managing changes.	Employees responsible for designing systems and managing service delivery
IP and Copyright Compliance Policy	Protection of intellectual property, the law, penalties and software license compliance.	All employees
Records Retention and Protection Policy	Retention period for specific record types, use of cryptography, media selection, record retrieval, destruction and review.	Employees responsible for creation and management of records
Privacy and Personal Data Protection Policy	Applicable data protection legislation, definitions and requirements.	Employees responsible for designing and managing systems using personal data
Clear Desk and Clear Screen Policy	Security of information shown on screens, printed out and held on removable media.	All employees
Social Media Policy	Guidelines for how social media should be used when representing the organization and when discussing issues relevant to the organization.	All employees
HR Security Policy	Recruitment, employment contracts, policy compliance, disciplinary process, termination	All employees
Acceptable Use Policy	Employee commitment to organizational information security policies.	All employees
Asset Management Policy	This document sets out the rules for how assets must be managed from an information security perspective.	All employees
CCTV Policy	The use of CCTV in physical security, including siting and data protection issues and considerations.	Employees responsible for CCTV
POLICY TITLE	AREAS ADDRESSED	TARGET AUDIENCE

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Configuration Management Policy	The secure configuration of hardware, software, services and networks.	Employees responsible for designing systems and managing service delivery
Information Deletion Policy	The deletion of information stored in information systems, devices or in any other storage media, when no longer required.	Employees responsible for designing and managing systems using personal data
Data Masking Policy	The use of data masking techniques such as anonymization and pseudonymization to protect personally identifiable information (PII).	Employees responsible for designing and managing systems using personal data
Data Leakage Prevention Policy	The configuration of relevant software tools to detect and prevent leakage of data.	Employees responsible for designing systems and managing service delivery
Monitoring Policy	The monitoring of the ICT environment to detect anomalous activity.	Employees responsible for designing systems and managing service delivery
Web Filtering Policy	Restricting access to Internet sites that are deemed inappropriate.	Employees responsible for designing systems and managing service delivery
Secure Coding Policy	The principles that will be used when developing secure code.	Employees responsible for designing, managing and writing code for bespoke software developments
Threat Intelligence Policy	The collection and use of threat intelligence at the strategic, tactical and operational levels.	Employees responsible for protecting the organization's infrastructure from attacks
Information Security Whistleblowing Policy	The raising of issues about information security within the organization.	All employees and other interested parties

Table 1: Set of policy documents

2.5 Application of information security policy

The policy statements made in this document and in the set of supporting policies listed in Table 1 have been reviewed and approved by the top management of Sabio Group and must be complied with. Failure by an employee to comply with these policies may result in disciplinary action being taken in accordance with the organization's **Employee Disciplinary Process**.

Questions regarding any Sabio Group policy should be addressed in the first instance to the employee's immediate line manager.