

Information Security Policy Version 1.0

Purpose

The purpose of this document is to demonstrate the company's commitment to information security, continual improvement and satisfying applicable information security requirements of its interested parties, such as potential and existing clients, partners and suppliers.

Scope

This policy is applicable to all Shearwell employees and contractors. It is communicated as part of the Company Induction process and is also made available to relevant interested parties upon request.

Policy

We are committed, through our Information Security Policy to:

- Providing assurance within the company and to our clients and partners that the availability, integrity and confidentiality of their information will be maintained appropriately.
- Protecting the company's ongoing ability to meet contracted information security commitments.
- Ensuring decisions and investments take into consideration information security.
- Satisfying applicable requirements in relation to information security (e.g. contractual, regulatory and other requirements etc.).
- Managing information security risks to all company and customer assets.
- Dealing effectively with security incidents and near misses.
- Maintaining awareness of all employees and contractors so they can identify and fulfil their contractual, legislative and company specific security management responsibilities.

This policy and objectives provide a framework for the Information Security Objectives which have been defined within the IMS Objectives Tracker by the Leadership Team. The setting of objectives considers applicable information security requirements, and results from risk assessment and risk treatment. These objectives are compatible with the strategic direction of the Company and support the continual improvement of the ISMS and measurement of its effectiveness.

Review

This Policy and the IMS objectives are reviewed regularly by the Leadership Team and as part of Management Review Meetings, as a minimum.

Policy Adherence

All information security policies and procedures can be found on the server. It is the responsibility of employees and contractors to read and comply with these and report any non-conformances in accordance with the Information Security Incident Reporting Process. Please contact Shearwell if you would like copies of these security policies.

Failure to comply with company security policies and procedures will result in disciplinary action and/or suspension or termination of contract where appropriate.

Richard Webber - Managing Director 22/02/2019