

Neptune Software Information Security Policy

PUBLIC

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1. Introduction

Neptune Software is deeply aware of the importance of protecting business information assets and all internal and external sensitive information. This Information Security policy will act as a foundation for building an information security management system which provides a mechanism to achieve the ISMS objectives defined.

The information that Neptune Software handles is an indispensable asset for business, therefore this policy is a commitment assumed by its Neptune Software to ensure the implementation and continuous improvement of a system for its management, hereinafter referred to as the Information Security Management System (ISMS), ensuring the availability of the necessary resources for its effectiveness.

2. Purpose of the ISMS

The main purpose of the ISMS is to:

1. Understand the organization's needs for establishing information security and privacy management policy and objectives;
2. Implement and operate controls and measures for managing the organization's overall capability to manage information security and privacy incidents;
3. Monitor and review the performance and effectiveness of the ISMS;
4. Continually improve the organization's information security and privacy posture based on regular objective measurement and evaluation.

3. Neptune Software Information Security Commitments

With an understanding that ensuring information security is one of the most critical tasks of management, as well as a corporate social responsibility, Neptune Software will ensure that every person engaged in its operations will be committed to it.

3.1. Commitment to Information Security

- **Confidentiality**
- **Integrity**
- **Availability**
- **Data Privacy**
- **Authenticity**

4. ISMS Objectives

To build an information security management system aimed at protecting information assets, Neptune Software will set out information security objectives that will serve as a foundation for the system. The leadership is committed to define and provide with the actions and resources needed to achieve the objectives.

i. Protection of Information Assets

Neptune Software will institute appropriate management measures according to the state of individual operations to unfailingly protect information assets from any threat to its confidentiality, integrity, and availability.

ii. Compliance with Laws and Regulations

Neptune Software will comply with applicable laws and regulations, other rules, and contractual requirements to ensure information security

iii. Risk Management

To ensure readiness and compliance of its ISMS, Neptune Software is committed to identifying, analysing, qualifying, and treating risks arising from various sources of threats.

All information security risks are properly assessed and documented at scheduled intervals.

iv. Educations and Training

Neptune Software will offer education and training to personnel engaged in its operations to improve their awareness of information security and familiarize them with all relevant policies and process

v. Incident and Business Continuity Management

Neptune Software will run its information security management system to ensure that every single employee works to prevent information security incidents from occurring. Should an incident take place, we will swiftly implement appropriate actions, including those for preventing recurrence.

The availability of information, without neglecting the responsibility of the other information security commitments, will be ensured by the implementation of responses to disruptive incidents and that fall within the scope of the Business Continuity Plan of Neptune Software

vi. Supplementary Policies

Whenever deemed relevant to the effectiveness of the ISMS, Neptune Software will define thematic policies that describe the practices implemented in various matters within the scope of protection, as well as the implementation of controls arising from the need to treat risk.

vii. Continuous Improvement

Every year we set information security goals, define, and plan activities to achieve those objectives, then, according to periodical review results, set the following year's goals.

In addition, we regularly evaluate and review all relevant policies and processes, its related internal regulations, and our information security management system, pursuing continuous improvement of information security.

5. Responsibilities

The Neptune's Software ISMS Management team has overall responsibility for monitoring the effectiveness of the policies and shall update as needed in consultation with other stakeholders when applicable.

All employees have overall responsibility for the adherence to this policy.

“As member of Neptune Software, you are essential to our ongoing effort to reduce Information Security Risks.”