



CrusaderSterling

PENSIONS

(A member of Custodian Investment Plc Group)

Information Security Statement

This document represents the official ISMS- Information Security Management System Policy for CrusaderSterling Pensions Limited.

Confidentiality Clause & Disclaimer

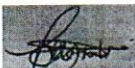
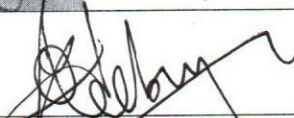
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VERSION CONTROL TABLE

Date of Issue	Document Author	Version	Status
June 28 th 2024	ISMS Manager	1.0	Initialized to ISMS Requirements
June 28 th 2025	ISMS Manager	2.0	Annual Review
August 14 th 2026	ISMS Manager	3.0	Annual Review

APPROVAL and SIGNOFF

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Distribution List

Name	Version
All Employees	V 3.0

Table of Contents

1.0	Distribution List	3
	INTRODUCTION	6
2.0	PURPOSE	6
3.0	SCOPE	6
4.0	POLICY	6
5.0	OBJECTIVES	7
6.0	RESPONSIBILITY	7
7.0	INCIDENT REPORTING	8
8.0	SUPPORTING POLICIES	8
9.0	FRAMEWORK FOR SETTING OBJECTIVES	8

1.0 INTRODUCTION

Information is one of CrusaderSterling Pensions Limited's most valuable asset. It is therefore important that the organization's information and its related technologies are guarded, carefully protected and secured thereby managing organizational risk to ensure sustainability and profitability.

2.0 PURPOSE

The purpose of this policy is to ensure that CrusaderSterling Pensions Limited information and information systems are recognized as a valuable asset and are managed accordingly to ensure their integrity, security and availability.

3.0 SCOPE

This Information Security Policy applies to all CrusaderSterling Pensions Limited's Shareholders, Board of Directors, and employees with access to CrusaderSterling Pensions Limited assets.

4.0 POLICY

CrusaderSterling Pensions Limited top management is committed to the security of her information assets and shall implement measures through the establishment, implementation, maintenance and continual improvement of information security processes and controls to protect the organization's information assets against all threats.

This policy requires:

- I. The confidentiality, integrity and availability of CrusaderSterling Pensions Limited information assets will be assured and

maintained.

- II. Information assets will be protected against unauthorized access.
- III. Compliance with applicable legislative and regulatory requirements in the usage of information assets

This Information Security Policy states the management commitment and sets out the approach to the protection of CrusaderSterling Pensions Limited information assets against all internal, external, deliberate, or accidental threats.

5.0 OBJECTIVES

Based on the requirements and factors set out in this document, the following major objectives are set for information security:

- **Objective 1** – Protect 95% of customers' confidential information, as well as the integrity and availability of CrusaderSterling Pensions Limited's Information assets.
- **Objective 2** - Improve information security awareness culture across the CrusaderSterling Pensions Limited's by 96%.
- **Objective 3**- Provide assurance of information systems resilience- 99.6% availability
- **Objective 4**- Ensure 100% percent compliance with CrusaderSterling Pensions Limited's contractual, regulatory, and legal requirements

The success of the ISMS will be judged on its ability to meet these overall objectives.

6.0 RESPONSIBILITY

All employees and third parties who require access to CrusaderSterling Pensions Limited information and associated assets are responsible for ensuring that this policy is adhered to. Management at all levels are responsible for ensuring that employees and third parties are aware of, and adhere

to, this policy.

7.0 INCIDENT REPORTING

If any employee or third-party personnel is aware of an information security incident, then they must report it through the designated email (IThelpdesk@crusaderpensions.com) for incident reporting.

8.0 SUPPORTING POLICIES

Supporting policies have been developed to strengthen and reinforce this policy statement. These, along with associated codes of practice, procedures and guidelines are published together and are available for viewing on CrusaderSterling Pensions Limited intranet.

All employees and any third parties authorized to access CrusaderSterling Pensions Limited network or computing facilities are required to familiarize themselves with these supporting documents and to adhere to them.

9.0 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.