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Information Security Management System Policy

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Introduction

In accordance with the provisions of this document, Information and Communication Resources (RIC) provided and administered by Ameropa Grains SA are considered strategic assets of the firm and should be managed accordingly.

The field of activity of **Ameropa Grains SA** is *distribution of fertilizers for agriculture, seeds, and pesticide in Romania.*

Compromising the security of these resources may affect the company's ability to provide information and communication services, may lead to fraud or destruction of data, in violation of contractual terms, disclosure of secrets, the damage to the credibility of the company partners. This policy is set:

- To be in accordance with the statute, regulations, laws and other official documents in force on public information resource management such as:
  - LAW no. 182 of 12 th April 2002 on the protection of classified information
  - GOVERNMENT DECISION no. 585/2002 - The National Standards on the Protection of Classified Information in Romania
  - GOVERNMENT DECISION no. 353/2002 on Norms on the Protection of NATO Classified Information in Romania
  - GOVERNMENT DECISION no. 781 / 25 th July 2002 on the protection of restricted information
  - Law No. 677/2001 on the Protection of Individuals with Regard to the Processing of Personal Data and the Free Movement of Such Data
  - The General Data Protection Regulation (EU) 2016/679 ("GDPR")
  - LAW no.506/2004 on the processing of personal data and the protection of privacy in the electronic communications sector
  - Order No. 52/2002 on approving the minimum safety requirements for personal data processing

- To establish prudent and acceptable practices regarding the use of Ameropa Grains' RIC.
- To train users who are entitled to use the RIC on the responsibilities associated with such use.

Audience

Ameropa Grains' ISMS policy applies equally to all Ameropa Grains SA personnel that are allowed access to any resources, computing and communications.

The following entities and users are covered separately by the provisions of the Policy:

- Employees with fixed-term employment contract or indefinite period having access to information and communication system;
- The 3rd parties (collaborators or suppliers), who have access to Ameropa Grains' RIC;
- Other persons, entities or organizations, interested parties that have access to Ameropa Grains' RIC.

Purpose

The ISMS policy is aimed to ensure the integrity, confidentiality and availability of information.

- Confidentiality refers to the protection of data against unauthorized access.
- Electronic files created which are sent, received or stored using the system's own RIC, managed or under the custody and control of Ameropa Grains SA may be categorized as confidential and can be accessed only by authorized personnel.
- Integrity refers to the measures and procedures used to protect data against unauthorized modifications or destruction.
- The availability ensures the continuous operation of all components of the RIC. Different applications require different levels of availability depending on the impact or damage as a result of RIC not working properly.
- The security policy aims also to establish the necessary framework for the development of regulations and safety procedures. These are mandatory for all users RIC.

Objectives

ISMS is intended to protect information to an appropriate extent by maintaining the level of risks to the organization at an acceptable level.

Effective ISMS enables information to be used and shared while protecting its value. In this way, our organization can maintain efficient operations, achieve legal compliance/contractual or other requirements and maintain its reputation.

Our organization will have its way of dealing with information risk and will take this into account when deciding what controls to implement. All users are responsible for contributing to Ameropa Grains' RIC: their actions, or inaction, can protect or expose information to risk.

ISO Annex A Domain #	ISO 27001:2013 Annex A Domain	Metrics Short Name	Objective of Metrics	Metrics	Positive / Negative Metrics	Frequency	Target	Measure	Task	Responsible Function	Source of Data	Implementation term
7	Human resources training	Security awareness program coverage among employees	To ensure employees are well informed about the information security practices within Ameropa Grains and are aware of their information security responsibilities	Percentage of employees who completed the ISMS training and responded correctly to at least 70% of test questions	Increasing is better	Yearly	100%	Percentage	Organize training and evaluation sessions	System Administrators	Training minutes	31.03.2020
12	Licensing issues	Reduce the number of software licensing issues to zero	Identify the extent of software licensing issues	0% of total security incidents	Decreasing is better	Yearly	0	Percentage	Monitor installed software	System Administrators	LanSweeper or equivalent software	31.03.2020
12	Operations Security	Ransomware attacks	Keep the number of ransomware attacks to 0%	Ransomware attacks =0% of total security incidents	Decreasing is better	Yearly	0	Percentage	Monitor AV solution	System Administrators	Anti-Virus server	31.03.2020
12	Operations Security	Outdated AV deployment	To identify the number of systems in use having old or no corporate anti-virus installed and hence susceptible to malwares	Number of computers with outdated AV x 100/Total number of computers with AV=percentage	Decreasing is better	Yearly	<4%	Percentage	Monitor AV solution	System Administrators	Anti-Virus server	31.03.2020
16	Information Security Incident Management	Security incidents	Keep the number of security incidents which result in exposure of personal information and the need to inform authorities to zero %	% of total security incidents	Decreasing is better	Yearly	0%	Percentage	Use apropriate controls to manage security risks	System Administrators	Incident and Actions Register.	31.03.2020

In conducting specific activities, the followings will be applicable:

- compliance with applicable legal and regulatory requirements and contractual obligations regarding information security;
- identification, analysis, evaluation, communication and treatment of information security risks/opportunities, annually or whenever necessary;
- establishing, updating and communication system rules and working on information security;
- controlled access to the building, facilities, assets, networks, documents, files and media;
- monitoring and recording company's interested parties and access to RIC;
- monitoring and recording the remote access to files and servers of the Organization;
- signaling and processing security incidents and deficiencies, application security measures prompt and effective action analysis;
- develop plans and response capacity in emergency situations;
- continual improvement of the Information Security Management System.

For the application of its ISMS, Ameropa Grains' CEO named CISO (Chief Information Security Officer) as responsible for operational management and maintenance of the it.

All employees, contractors, 3rd parties or interested parties who have access to Ameropa Grains' RIC have a duty to comply with this established policy and safety procedures/policies and to report all suspected incidents of actual or by CISO.

In applying this policy are established safety procedures.

This policy is available for all Ameropa Grains SA employees and interested parties, on demand and on the website.