

IXCELLERATE LIMITED LIABILITY COMPANY
IXCELLERATE 3 LIMITED LIABILITY COMPANY

INFORMATION SECURITY POLICY

APPROVED BY
General Director of IXCELLERATE LLC
General Director of IXCELLERATE 3 management entity

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Corporate Policy **24 May 2024**

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Title (Eng)	Information security policy
Translated title (Ru)	Политика в области информационной безопасности
Purpose	Establish IXCELLERATE's intentions and areas of focus in information security
Review interval	once every 3 years or upon revision
Date of next review (year-month)	27-05
Document owner	Head of IT

Document drafted by:

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1. PURPOSE AND SCOPE

The establishment of the intentions and areas of focus of IXCELLERATE LLC and IXCELLERATE 3 LLC (hereinafter referred to as “IXCELLERATE”) in information security.

2. INFORMATION SECURITY POLICY

In the pursuit of its activities IXCELLERATE pays special attention to information security in an attempt to ensure the confidentiality, integrity and availability of any information used by stakeholders participating in IXCELLERATE's operating activities. With this end in view, IXCELLERATE:

- 2.1. provides services in full compliance with the statutory requirements and the reasonable requirements and expectations of customers;
- 2.2. involves employees in the information security arrangements, keeps their skills at a high level, raises their levels of responsibility and awareness, and provides regular training and advice on information security;
- 2.3. takes various organizational and technical measures towards information security using cutting-edge solutions to counter threats to information security;
- 2.4. reduces risks in information security;
- 2.5. implements and ensures the high performance and continuous improvement of the information security management system in compliance with the requirements of ISO/IEC 27001:2022.

The Policy applies to all employees and third parties using the information assets of IXCELLERATE.

The Policy applies to all IXCELLERATE's information as well as to the connected equipment and peripherals (for example, computer systems, hardware and software, networks, printers) needed to access, transport, store and process this information.

The Policy applies to all information assets of IXCELLERATE irrespective:

- of format (text, audio, video);
- of media (paper and electronic archives, portable computing devices and media);
- of equipment used for the processing thereof (printers, computer systems, hardware and software, networks).

3. REVIEW FREQUENCY

This Policy will be updated in the event of legislative amendments, changes to IXCELLERATE's requirements, as well as in response to findings of a management review of the integrated management system. At a minimum, this Policy will be reviewed and approved every three years for applicability, practicality and effectiveness.

Revision history

Version number	Effective date	Summary of the change made
IT-PL-001-210817	2021-12-10	Original version
IT-PL-001-220706	2022-07-13	An update to the Policy in connection with the establishment of requirements for its implementation.
IT-PL-001-230720	2023-08-02	An update in response to a change in IXCELLERATE's requirements
IT-PL-001-240515	2024-05-24	An update in response to an amendment of information security objective setting (chapter 2)