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# GRAHAM Information Security Policy

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POL-059

## 1. Purpose & Scope

It is the objective of John Graham Holdings Ltd. (“GRAHAM”) and our associated operating companies; John Graham Construction Ltd. Graham Asset Management Ltd. and Graham Investment Projects Ltd. to manage an effective Information Security Management System (ISMS) in accordance with our set company objectives. The aim of this system is to protect the information of our clients, our employees and other business critical information. John Graham Holdings Ltd. is committed to satisfying applicable requirements related to information security including legislation.

The objectives of the GRAHAM ISMS are:

- To prevent loss of confidential data that could cause embarrassment to GRAHAM or our clients;
- To comply with applicable requirements related to information security;
- To apply a standard approach to security management;
- To ensure the continued availability of the IT infrastructure and associated services to GRAHAM Group staff;
- To promote and achieve continual improvement of the ISMS.

## 2. Policy Statement

This policy statement summarises our overall commitment to proactively managing information security. This policy is supported by a number of policies covering specific areas of information security.

This policy, drawn up by the Board of Directors, is the direct concern of the Company’s Senior Management, who are accountable to the Board of Directors for its overall implementation.

The Company is committed to ensuring that the necessary resources are devoted to meeting our objectives. This includes the provision of information, training and instruction as needs arise and also ensuring that the information security management system is continually improved.

This policy statement will be communicated to all persons working for and on behalf of John Graham Holdings Ltd. its subsidiary operating companies and any other relevant “interested parties”.



MICHAEL GRAHAM  
Chairman  
John Graham Holdings Ltd.