

## **Information Security Policy**

CLM's objective is to preserve the confidentiality, integrity and availability of information that it either owns or is entrusted with.

To achieve the stated objectives, the company has implemented an Information Security Management System (ISMS) in accordance with the international standard ISO/IEC 27001.

The purpose of this policy is to protect CLM's assets from all relevant threats, whether internal or external, deliberate or accidental.

It is the policy of CLM that:

- Information is made available with minimal disruption to staff and customers as required by the business process;
- The integrity of this information is maintained;
- Confidentiality of information is preserved;
- Regulatory, legislative and other applicable requirements related to information security are met;
- Appropriate information security objectives are defined and, where practicable, measured;
- Appropriate Business Continuity arrangements are in place to counteract interruptions to business activities and these take account of information security;
- Appropriate Information security education, awareness and training is available to staff and relevant others working on behalf of the company;
- Breaches of information security, actual or suspected, are reported and investigated through appropriate processes;
- Appropriate access control is maintained and information is protected against unauthorized access;
- Continual improvement of the information security management system is made as and when appropriate;
- Effectiveness of the ISMS is maintained and measured by regular internal and external auditing.

This policy is approved by senior management and is reviewed at regular intervals or upon significant change.

This policy is communicated within CLM, is available on CLM's corporate website and is available to interested parties upon request.

## Document Control

The CISO (Chief Information Security Officer) is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the ISMS.

A current version of this document is available to all members of staff and is published.

This procedure was approved by the CEO and the Senior Management Team, issued on a version-controlled basis.

*Name: John Lawrence*

*Position: CLM Fleet Management Ltd CEO*

*Date: 3rd October 2022*

### Change History

<b>Issue Number</b>	<b>Issue Date</b>	<b>Comments</b>
1.0	10/12/2015	Initial issue
1.1	07/02/2017	Document control statement updated to remove reference to signatures
1.2	05/06/2017	Reviewed and approved by IMS
1.3	04/06/2018	Annual review
1.4	04/07/2019	Annual Review
1.5	02/01/2020	Changed formatting of Policy, fitting to one page for the web.
1.6	09/01/2020	Updated to remove Logo, as this doesn't work for web with the other business in the group.
2.0	09/03/2020	Annual Review
2.1	29/07/2021	Annual review, signed off by all CLM company directors.
3.0	03/10/2022	Removed reference to Maxxia Group, after CLM MBO.