



Information Security Policy

Information Security Policy (hereinafter referred to as «The Policy») serves as a basis for functionality and improvement of the Information Security Management System at AESW LTD (hereinafter referred to as «ISMS»).

This Policy is in full agreement with the strategies and objectives of the business; it is supported by individual information security policies at AESW LTD and provides a basis for determination of ISMS policies.

Management at AESW LTD is aware of the fact, that effectiveness of the ISMS can be achieved only if all employees and stakeholders are committed to the ISMS objectives and the established ISMS requirements as well as if the requirements set by the applicable legislation are complied with.

Information Security is a protection of information privacy, its integrity and accessibility; some other properties such as authenticity, accountability, non-repudiation and reliability can also apply.

AESW LTD is striving to ensure Information Security provision in order to gain maximum return from investments, to fulfill opportunities, minimize business risks as well as to comply with laws and requirements set by stakeholders, to sustain a positive image and reputation of the company.

A necessary condition for achievement of the set objectives is thought by the Management of AESW LTD to comprise the following: continual improvement of ISMS according to international standards requirements, project management system, preventative measures for and recovery of business activities in fight against potential threats, provision of security of information infrastructure components with AESW LTD while using defense-in-depth, personnel training and keeping their knowledge updated.

Management at AESW LTD, for the conditions to be fulfilled, undertakes to adhere to the following main principles:

- systematic approach, viewing assets as interdependent components of one system;
- completeness, comprehensively using a wide range of methods and means of information security;
- Cost effectiveness, excluding cost-overrun on the measures being integrated against the results yielded by such measures;
- Strengthening of the weak link and impossibility to switch onto an unsafe condition;
- Minimization of privileges and segregation of duties;
- Multi-tiered defense, determining main security zones;
- Manageability, arranging for monitoring and timely identification of non-conformities;
- Lawfulness, abiding by the applicable Russian and International legislation as well as by the requirements of the internal documents of AESW LTD.

This Policy has its focus on involvement of each employee and stakeholders in the ISMS processes and establishment of responsibilities for compliance with the applicable information security requirements within the said persons' competence.

Provisions of this Policy shall be binding for all employees and stakeholders with AESW LTD.

Revision of this Policy is undertaken on a regular basis at least once in two years, and, -should internal and external factors occur that can impact the level of information security at AESW LTD and whose presence makes the Policy lose its relevance (suitability, adequacy, effectiveness), - revision is undertaken on an extraordinary basis.

Introduction of changes into this Policy can be initiated by any employee interested in the improvement of Information Security management processes.
