

RWS Group

ISMS Policy

Author: Russell Frith **Approver:** Terry Doyle

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Document history

Name	Date	Detail	Version
Ed Parkins	20/05/2021	Document creation	0.1 draft
Shane Clarke	21/05/2021	Reviewed, no amendments	0.1 draft
Carla Matthews	22/05/2021	Reviewed, amendments made	0.2 draft
Azad Ootam	27/05/2021	Reviewed, approved	1.0
Russell Frith	02/09/2022	Policy Review. Updated IS executive sponsor to CIO.	1.1
Terry Doyle	02/09/2022	Approved	1.1
Russell Frith	22/08/2023	Policy review. Updated SGRC team reference.	2.0
Terry Doyle	04/09/2023	Approved	2.0

Scope

RWS is the world's leading provider of technology-enabled language, content management and intellectual property services. We help our customers to connect with people globally by communicating business critical content at scale, and enabling the protection and realization of their ideas and innovations.

Our customers place their trust in RWS every day. We have a responsibility to manage and protect the information and assets of our customers in exactly the same way we protect our own. RWS Executives, Management and the Security Governance, Risk and Compliance team take this responsibility very seriously and are fully committed to maintaining and improving the Information Security Management System (ISMS) as part of RWS' business strategy.

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This ISMS policy details the approach RWS Holdings plc, its affiliates and its subsidiaries ("RWS") takes and applies to all RWS employees, contractors and vendors with access to RWS systems, facilities or information in any form whilst supporting global operations in any capacity. It is the responsibility of each person to whom this policy applies to remain fully conversant with the latest versions of this and other RWS information security and privacy policies and processes applicable to their role.

RWS' ISMS consists of the people, processes and technologies required to ensure an effective and appropriate risk-based approach to the selection, implementation, monitoring and management of the security, privacy and business continuity controls necessary to support business aims. The ISMS is designed to protect information and assets from threats and vulnerabilities, whether internal or external, deliberate or accidental. The Executive Sponsor and owner of this policy is the Chief Information Officer.

Policy

All employees and contractors shall contribute to the protection of RWS and customer information, assets and personnel by:

- Protecting facilities, resources and information from unauthorized access
- Handling information and assets in accordance with Group and Divisional policies and practices to protect their confidentiality, integrity and availability
- Complying with regulatory and legislative requirements
- Producing, testing and maintaining business continuity plans
- Undertaking information security awareness and training relevant to their role
- Reporting as soon as possible actual or suspected security incidents to ensure they can be appropriately investigated
- Monitoring the performance of security controls regularly to ensure continued
 effectiveness and timely identification of weaknesses
- Reviewing policies and processes regularly to ensure their relevance and their continued support to business aims

Each of these objectives is governed and implemented according to one or more Information Security and Privacy Policies. All RWS Information Security and Privacy Policies are available via the RWS Group Intranet.

It is the individual responsibility of all RWS employees and contractors to comply with the security and privacy policies and processes. Managers are responsible for ensuring the implementation of policies within their business areas. Deliberate or persistent

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failure to comply with RWS policies may result in administrative or disciplinary action being taken.

Policy review

This Policy is available on the Group's intranet. If there are amendments to the applicable legislation or regulatory requirements, the Policy will be amended to reflect these. There will be an annual review by the person responsible for the Policy to ensure the document is fit for purpose and remains effective. Any changes will be communicated by email by way of the "Regulatory and compliance update", team briefings or training, depending on the complexity of the amendment.

Doyle Reason: I approve this document Date: Sep 5, 2023 09:48 GMT+1

T Doyle

Chief Information Officer

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