



INFORMATION SECURITY POLICY

At Shiva Performance Materials Private Limited (SPMPL), we recognize that information is a critical asset, and its secure management is fundamental to maintaining trust with our stakeholders, protecting our business operations, and ensuring compliance with legal and regulatory requirements. We are unequivocally committed to ensuring the secure collection, processing, storage, and transmission of all information, especially sensitive third-party data entrusted to us for business purposes.

This policy outlines our dedication to safeguarding information confidentiality, integrity, and availability across all our operations, systems, and interactions, protecting against unauthorized access, use, disclosure, disruption, modification, or destruction.

Our Core Information Security Principles:

- **Confidentiality**: Protecting sensitive information from unauthorized disclosure.
- **Integrity:** Ensuring the accuracy, completeness, and reliability of information and processing methods.
- Availability: Ensuring authorized users have timely and reliable access to information and systems.
- Risk-Based Approach: Identifying, assessing, and managing information security risks systematically.
- **Compliance**: Adhering to all applicable laws, regulations, and contractual obligations related to information security and data privacy.
- **Continuous Improvement:** Regularly reviewing and enhancing our information security posture to adapt to evolving threats and technologies.
- Accountability: Promoting a culture where all employees understand and fulfill their responsibilities for information security.

1. Data Confidentiality, Integrity, and Availability

SPMPL is committed to maintaining the confidentiality, integrity, and availability of all information assets, including intellectual property, financial data, employee information, and crucially, third-party confidential information (e.g., customer specifications, supplier details).

Objectives:

- Implement robust controls and processes to ensure that all information assets are protected against unauthorized access, alteration, or destruction, thereby preserving their confidentiality and integrity, and ensuring their availability when needed.
- Ensure 100% of critical data (including third-party confidential data) is encrypted both at rest and in transit by 2027.
- Achieve 99.9% system uptime for critical business applications by 2026, supported by robust backup and disaster recovery plans.

SHIVA PERFORMANCE MATERIALS PRIVATE LIMITED

CIN No. : U24100GJ2013PTC078001

Corporate Office: 9th Floor, ABS Tower, Old Padra Road, Vadodara - 390 007. Gujarat, India.

Tel. + 91 265 2321418 / 2335432 • **Fax** : +91 265 2357238 • **E-mail** : marketing@shivaperformance.com

Works: Plot No. 447 to 460 & 502, ECP Canal Road, Village: Karakhadi, Taluka: Padra, Dist.: Vadodara-391 450. Gujarat, India.

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2. Risk Management & Compliance

SPMPL will adopt a proactive, risk-based approach to information security, ensuring compliance with relevant data protection laws and industry standards.

Objectives:

- Systematically identify, assess, and manage information security risks across all systems, applications, and processes, ensuring adherence to data protection regulations (e.g., GDPR, local privacy laws) and industry best practices.
- Conduct comprehensive IT security risk assessments for 100% of our key operational sites and critical IT systems by 2028.
- Maintain 100% compliance with applicable data privacy regulations, verified through regular internal and external audits.

3. Access Control & System Security

SPMPL is committed to implementing stringent access controls and robust system security measures to protect information systems and data from unauthorized access or misuse.

Objectives:

- Enforce strict access control policies based on the principle of least privilege, ensuring that users, including third parties, only access information essential for their roles, while continuously securing our network infrastructure and endpoints.
- Implement Multi-Factor Authentication (MFA) for 100% of remote access and critical internal systems by 2026.
- Achieve 95% patch compliance for all critical IT systems within 72 hours of patch release by 2027.

4. Employee Training & Awareness

SPMPL recognizes that human factors are critical to information security. We are committed to fostering a security-aware culture among all employees.

Objectives:

- Provide comprehensive and continuous information security awareness training to all employees, contractors, and relevant third parties, ensuring they understand their roles and responsibilities in protecting company and third-party information.
- Achieve 100% completion of mandatory annual information security awareness training for all employees by 2027.
- Conduct at least two simulated phishing exercises annually, aiming for a continuous reduction in click-through rates.

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5. Incident Management & Response

SPMPL is committed to promptly detecting, responding to, and recovering from information security incidents to minimize their impact and prevent recurrence.

Objectives:

- Establish and maintain a robust information security incident response plan to ensure timely detection, effective containment, eradication, recovery, and post-incident analysis of all security incidents.
- Ensure 100% of detected security incidents are formally investigated within 24 hours of discovery.
- Reduce the average time to contain a critical security incident by 20% year-over-year through 2028.

6. Third-Party Data Management

SPMPL is committed to the responsible and secure management of third-party information collected, processed, or stored for business purposes, including customer, supplier, and partner data.

Objectives:

- Implement strict protocols and contractual agreements for handling all third-party confidential and sensitive information, ensuring its protection throughout its lifecycle within our systems and in interactions with external entities.
- Conduct security and privacy due diligence for 100% of third-party vendors with access to sensitive company or customer data by 2027.
- Ensure 100% of third-party data processing agreements include robust data protection clauses and security requirements by 2026.

Implementation, Monitoring, and Review:

This Information Security Policy will be implemented across all SPMPL departments and will be supported by detailed procedures, technical controls, and ongoing education. We will continuously monitor our security posture, conduct regular internal and external audits, and review the policy annually to ensure its effectiveness, relevance, and alignment with evolving threats, technologies, and regulatory landscapes.

Date: July 08, 2024





Shwetal Sakaria

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