

PURPOSE

The objective of this Information Security Policy Statement is to outline the way in which Evolve Housing Limited (and its controlled entities described in clause 9 of this policy) (“**Evolve Housing Group**”) recognise its responsibility to protect information, and the measures and initiatives the Evolve Housing Group are undertaking to ensure information is secure and protected.

POLICY NUMBER	ICT008
POLICY OWNER	Group General Manager, People, Culture and Corporate Services
APPROVED BY	Group Executive Team
APPROVAL DATE	October 2024
REVIEW DATE	October 2027

1. INTRODUCTION

The Evolve Housing Group (the Company) is committed to protecting and safeguarding the Information of the Company and recognises that this is critical to realising its vision, mission, values and strategic objectives. This commitment encompasses all Information, whether it relates to our clients, employees, or operational activities. By implementing robust security measures, we aim to safeguard against unauthorised access, disclosure, alteration, and destruction of Information.

This Information Security Policy Statement (the Policy) has been developed to ensure both internal and external stakeholders are aware of the Company’s commitment to information security and its continuous improvement cycle.

2. SCOPE

The Policy applies to the Company, including Employees and Directors.

3. DEFINITIONS

Directors means a director of the Company.

Employees means any person who is employed by or volunteers for the Company, and includes cadets, interns and persons undertaking work experience. For the purpose of this Policy, Contractors engaged in providing services to and or behalf of the Company are included within the definition of “Employee”.

Information means data in any form, and specifically includes data that is in a digital or electronic form and is stored, processed or transmitted.

Privacy Laws means the *Australian Privacy Principles 2014* and the *Privacy Act 1988* (Cth) (as amended from time to time).

4. POLICY

The Evolve Housing Group recognise its responsibility to protect Information. Our clients, stakeholders and partners depend on our ability to receive, process, store and transmit data while ensuring its confidentiality, integrity and availability.

The Evolve Housing Group is committed to protecting client and consumer information from threats whether they be environmental, internal, external, malicious or accidental.

We are in the process of classifying Information we hold according to its level of sensitivity and we apply industry risk management methodologies to identify emerging threats and to ensure mitigation strategies and security controls are applied that are proportionate with the level of risk.

Our business demonstrates our ongoing commitment to Information Security by:

- Finalising the documenting and implementing of information security policies and standards that reflect the Company's commitment to information protection and integrity.
- Assessing the Company's ongoing compliance with information security policies and standards.
- Complying with Privacy Laws which regulate the collection, use and disclosure of personal information, other applicable contractual obligations and legislative and industry requirements related to information security.
- Following a risk assessment process, including undertaking risk assessments, monitoring and measuring risks in accordance with a Board approved risk appetite.
- Applying physical, environmental and logical controls to data and facilities, including infrastructure and assets to provide client assurance. Working towards the implementation of controls to enable access to sensitive information to be restricted to only those with an authorised business need.
- Through Employee and Director training and phishing activities, increasing information security awareness to drive positive Employee and Director behaviour, compliance with policies and to minimise the likelihood of a security incident.
- Ensuring Employees and Directors are aware of their responsibility to report information security incidents and issues, both actual or suspected, which can then be investigated by the Company.
- Monitoring security events, investigating root causes and applying preventive actions.
- Implement and regularly review security controls to protect our information assets.
- Developing and testing Information Security Incident Response Plans in order to support timely and effective recovery from disruptive information security events.
- Investing in new technologies for the protection of information, systems and networks.
- Managing Employees and Directors to ensure both physical and electronic information is protected.

In order to achieve our objectives, we are in the process of implementing an Information Security Management system which aligns to best industry practice (having regard to the Company's size and activities) and demonstrates our ongoing commitment to continuous improvement.

The responsibility for information security within our business, lies with all of us!

7. RESPONSIBILITIES

The Policy Owner is responsible for:

1. Implementing the Policy;
2. Establishing systems and processes to support compliance with the Policy;
3. Developing and updating procedures and other documents related to the Policy, and
4. Developing and overseeing training related to the Policy.

Employees and Directors are responsible for:

1. Abiding by this statement and any direction given by the Company pertaining to this statement.
2. Completing training and participating in education and awareness activities as directed by the Company.

8. MONITORING AND ASSURANCE

This Policy will be made available electronically, and on request for those that do not have electronic access.

To ensure adequate monitoring and assurance of the Policy, the Policy Owner will monitor and review this Policy every three years, unless an alternative timeframe is required by law, under contract or a risk assessment or system improvement requires an earlier review date.

9. APPLICABILITY

This policy applies to :

Company
Evolve Housing Limited
EchoRealty NSW & ACT Limited
EchoRealty Vic Limited
Evolve Arncliffe Limited
Evolve Blacktown Limited
Evolve Penrith Limited
Evolve Melrose Park Limited
Evolve Merrylands Limited
Evolve Granville Limited
Evolve Edgecliff Limited
Evolve Carinya Limited
Evolve Housing Vic Limited
Evolve Playford Limited
Evolve Rosanna Limited
Evolve Sunshine Limited

10. VERSION CONTROL

The Policy, Governance and Compliance Officer will ensure that following a review of the Policy, version numbers are updated and obsolete versions are archived.

Signed:

Name

Lyll Gorman, Group Chief Executive Officer

Date

28 October 2024

On behalf of the Evolve Housing Group

REVISIONS

The following revisions have been made to this Policy:

DATE REVIEWED	POLICY REVIEWER	DESCRIPTION
28/10/24	GGM GAL	Policy Statement establishment by GGM GAL