COOL HARBOUR Ltd. (COOL HARBOUR) recognises that the disciplines of confidentiality, integrity and availability in Information Security Management are integral parts of its management function. The Management of COOL HARBOUR views these as primary responsibilities and fundamental to the best business practice of adopting appropriate Information Security Controls, along the lines laid down in the ISO27001 standard.

COOL HARBOUR's Information Security Policy seeks to operate to the highest standards continuously and to implement and operate fully ISO 27001 standard, including continual improvement, through annual review.

COOL HARBOUR adopts the following principles to support their commitment to information security:

Confidentiality: Data and information assets is confined to people authorized to access and not disclosed to others

Integrity: Data is kept intact, complete and accurate and Information technology systems operational.

Availability: Information is only accessible to authorised persons from within or outside the company.

Communication: Information Security objectives, and performance in achieving these objectives, throughout the organisation and to interested parties.

Report and Investigate all breaches of information security and suspected weaknesses.

Customers and Suppliers: Work closely with our customers and suppliers in seeking to establish appropriate information security standards.

Employees: Training and awareness is provided to all personnel on information security and are informed that compliance with the policy is mandatory.

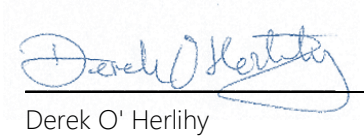
Continuity: Business continuity plans are established, maintained, and tested.

Continually monitoring and improving the effectiveness of the Information Security Management System, including risk assessment and risk treatment strategies, while making best use of its management resources to better meet Information Security Requirements.

Compliance: Comply with all business and legal, statutory or regulatory requirements, and contractual security obligations.

The above principles are understood by all employees to continue to drive a strong information security culture at all levels of our organization.

This policy has been approved by the company management and shall be reviewed annually to ensure continuing suitability to COOL HARBOUR and the ISO 27001 standard.



Derek O' Herlihy
Operations Director, Cool Harbour, Ltd.

Date: 20 / 05 / 2019