**Gotham Ltd. Risk Management Policy**

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| **1. Introduction**  The purpose of this Risk Management Policy is to identify, assess, mitigate, and monitor risks that may impact Gotham Ltd.'s operations, data security, and compliance with relevant laws. This policy applies to all employees, contractors, and third-party vendors who interact with the company's IT infrastructure or physical assets. |
| **2. Scope**  This policy covers all aspects of risk management within Gotham Ltd., including but not limited to:  • **Information Technology** : Network security, data protection, access control.  • **Physical Assets** : Protecting facilities, warehouses, and factories.  • **Compliance** : Ensuring adherence to local laws (e.g., Indonesia's POPA) and international standards (e.g., GOPR).  • **Third-party Relationships** : Managing risks associated with suppliers and partners. |
| **3. Risk Identification**  Gotham Ltd. employs a comprehensive approach to identify potential risks, including:  • **Threat Analysis** : Regularly assess external threats such as cyberattacks, data breaches, and natural disasters.  • **Vulnerability Assessments** : Identify internal vulnerabilities in IT systems and physical infrastructure.  • **Third-party Risks** : Evaluate risks posed by suppliers and partners who access company resources. |
| **4. Risk Assessment**  Risks are evaluated based on their likelihood and potential impact:  • **Likelihood** : The probability of a risk occurring (e.g., frequency of cyberattacks).  • **Impact** : The potential consequences of a risk materializing (e.g., financial loss, reputational damage). |

**5. Risk Mitigation**

Strategies to mitigate identified risks include:

• **Network Security** : Implement robust firewalls, intrusion detection systems, and regular security updates.

• **Data Protection** : Use encryption for data at rest and in transit; conduct regular backups.

• **Access Control** : Enforce multi-factor authentication (MFA) and role-based access control

(RBAC).

• **Physical Security** : Install surveillance cameras, secure entry points, and regular security patrols.

• **Compliance Measures** : Ensure all third-party vendors adhere to company security policies.

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| **6. Monitoring and Reporting**  Gotham Ltd. maintains continuous oversight of risks through:  • **Real-time Monitoring** : Use security tools to detect and respond to threats promptly.  • **Incident Response Plan** : Establish a structured approach to handle security incidents effectively.  • **Reporting Mechanisms** : Encourage employees to report potential risks and incidents through designated channels. |
| **7. Compliance**  The company ensures alignment with legal and regulatory requirements by:  • Conducting regular audits to verify compliance with POPA and GOPR.  • Updating policies and procedures to reflect changes in regulations. |
| **8. Training and Awareness**  Gotham Ltd. invests in employee training to:  • Enhance awareness about potential risks and mitigation strategies.  • Foster a culture of security and compliance within the organization. |
| **9. Periodic Review**  This policy is reviewed annually or as needed, to adapt to evolving threats and changes in company operations. Updates are communicated to all relevant stakeholders. |
| **10. Conclusion**  By adhering to this Risk Management Policy, Gotham Ltd. aims to safeguard its assets, maintain compliance with legal requirements, and mitigate risks that could impact the company's success and reputation. |

**Approved by:**

[Name] [Title] Gotham Ltd.