



## Internet Usage Policy

### Purpose

The purpose of this Internet Usage Policy is to establish rules to ensure that usage of the internet complies with Xebia policy, to protect Xebia against damaging legal consequence, and to educate the individuals who may use the internet with their responsibilities associated with such use.

### Scope

The Internet usage Policy applies to all Internet users (individuals working for Xebia, including permanent full-time and part-time employees, contract workers, temporary agency workers, business partners, trainers, freelancers, remote workers and vendors and their personals) who access the Internet through the computing or networking resources.

### Policy

#### USAGE THREATS

Internet connectivity presents Xebia with new risks that must be addressed to safeguard the facility's vital information assets. These risks include:

#### Inappropriate Use of Resources

Access to the Internet by personnel that is inconsistent with business needs results in the misuse of resources. These activities may adversely affect productivity due to time spent using or "surfing" the Internet. Additionally, Xebia may face loss of reputation and possible legal action through other types of misuse.

#### Misleading or False Information

All information found on the Internet should be considered suspect until confirmed by another reliable source. There is no quality control process on the Internet, and a considerable amount of its information is outdated or inaccurate.

#### INTERNET SERVICES

Access to the Internet will be provided to users to support business activities as needed to perform their jobs and professional roles.

#### User Services

##### Internet Services Allowed

1. Internet access is to be used for business purposes only. Capabilities for the following standard

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Internet services will be provided to users as needed:

2. E-mail -- Send/receive e-mail messages to/from the Internet (with or without document attachments),
3. Navigation -- WWW services as necessary for business purposes, using a hypertext transfer protocol (HTTP) browser tool.
4. File Transfer Protocol (FTP) -- Send data/files and receive in-bound data/files, as necessary for business purposes.
5. SSH -- Standard Internet protocol for terminal cumulation. User Strong Authentication required for Internet initiated contacts into Xebia.
6. Management reserves the right to add or delete services as business needs change or conditions warrant, All other services will be considered unauthorized access to/from the Internet and will not be allowed.

#### Request for Internet Access

As part of the Internet access request process, the personnel is required to read both this Internet usage policy and the associated Internet/Intranet security policy. The user must then sign the statements that he/she understands and agrees to comply with the policies. Users not complying with these policies could be subject to disciplinary action up to and including termination.

Policy awareness and acknowledgment, by signing the acknowledgment form, is required before access will be granted.

#### Approval

Basic Internet access is provided to all Xebia personnel's . No extra or additional approvals are required. If any person would like to access the sites that are restricted, then approvals would be required.

#### Removal of privileges

Internet access will be discontinued upon termination of personnel, completion of contract, end of service or disciplinary action arising from violation of this policy, The privileges granted to users must be re-evaluated by management annually. In response to feedback from management, systems administrators must promptly revoke all privileges no longer needed by users.

### USAGE POLICIES

#### Allowed Usage

Internet usage is granted for the sole purpose of supporting business activities necessary to carry out job functions. All users must follow the corporate principles regarding resource usage and exercise good

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judgment in using the Internet. Questions can be addressed to the IT Department. Acceptable use of the Internet for performing job functions might include:

1. Communication between personnel and non-personnel for business purposes.
2. IT technical support downloading software upgrades and patches.
3. Review of possible vendor web sites for product information.
4. Reference regulatory or technical information.
5. Research

#### Personal Usage

Using Xebia computer resources to access the Internet for personal purposes, without approval from the user's manager and the IT Support team, may be considered cause for disciplinary action up to and including termination. All users of the Internet should be aware that Xebia network creates an audit log reflecting request for service, both in-bound and out-bound addresses, and is periodically reviewed. Users who choose to store or transmit personal information such as private keys, credit card numbers or certificates or make use of Internet "wallets" do so at their own risk. Xebia is not responsible for any loss of information, such as information stored in the wallet, or, any consequential loss of personal property.

#### Prohibited Usage

Acquisition, storage, and dissemination of data which is illegal, pornographic, or which negatively depicts race, sex or creed is specifically prohibited.

Xebia also prohibits the conduct of a business enterprise, political activity, engaging in any form of intelligence collection from our facilities, engaging in fraudulent activities, or knowingly disseminating false or otherwise libelous materials.

Other activities that are strictly prohibited include, but are not limited to:

- I. Accessing Xebia information that is not within the scope of one's work. This includes unauthorized reading of customer account information, unauthorized access of personnel file information, and accessing information that is not needed for the proper execution of job functions.
2. Misusing, disclosing without proper authorization, or altering customer or personnel information. This includes making unauthorized changes to a personnel file or sharing electronic customer or personnel data with unauthorized personnel.
3. Deliberate pointing or hyper-linking of Xebia web sites to other Internet/WWW sites whose content may be inconsistent with or in violation of the aims or policies of Xebia.
4. Any conduct that would constitute or encourage a criminal offense, lead to civil liability, or otherwise

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- violate any regulations, local, state, national or international law,
5. Use, transmission, duplication, or voluntary receipt of material that infringes on the copyrights, trademarks, trade secrets, or patent rights of any person or organization, Assume that all materials on the Internet are copyright and/or patented unless specific notices state otherwise,
  6. Transmission of any proprietary, confidential, or otherwise sensitive information without the proper controls,
  7. Creation, posting, transmission, or voluntary receipt of any unlawful, offensive, libelous, threatening, harassing material, including but not limited to comments based on race, national origin, sex, sexual orientation, age, disability, religion, or political beliefs.
  8. Any form of gambling.
  9. Online video and audio streaming.

Unless specifically authorized, the following activities are also strictly prohibited:

- Unauthorized downloading of any shareware programs or files for use without authorization in advance from the IT Support Team and the user's manager,
- Any ordering (shopping) of items or services on the Internet.
- Playing of any games.
- Forwarding of chain letters.
- Participation in any on-line contest or promotion.

#### Cloud services usage

Cloud services usage is granted for the sole purpose of supporting business activities necessary to carry out job functions. Cloud services includes, but not limited to, Google Docs, Office 365, Online Document Sharing, etc. All users must follow the corporate principles regarding usage of cloud services and exercise good judgment in using the different services. Questions can be addressed to the IT Support Team.

Acceptable use of the Cloud Services for performing job functions might include:

- Authorized users must use their official email address/official id to access any cloud service
- Resource owner must make sure that he/she sends sharing invitation on user's official email address

#### Firewall Web Filter Policy

- The firewall Web Filter database contains URLs (web pages) organized into categories to be used in filtering policies to manage access to the web.

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- Access to any Web Filter Category will be approved and provided only if reasonable business needs are identified. Web Filter Category will be granted based on a personnel's current job responsibilities, e If an employee moves to another business unit or changes job functions, a new Web Filter Category request must be submitted within 5 days.
- Request to allow any category or URL from blocked category must be approved by HOD and logged with IT Support.

Bandwidth both within Xebia and in connecting to the Internet is a shared, finite resource. Users must make reasonable efforts to use this resource in ways that do not negatively affect other employees. Specific departments may set guidelines on bandwidth use and resource allocation, and may ban the downloading of file types.

#### Review Of Public Information

All publicly writeable directories on Internet-connected computers will be reviewed and cleared when necessary. This process is necessary to prevent the anonymous exchange of information inconsistent with Xebia business, Examples of unauthorized public information include pirated information, passwords, credit card numbers, and pornography.

#### Expectation of Privacy

##### Monitoring

Users should consider their Internet activities as periodically monitored and limit their activities accordingly,

Management reserves the right to examine e-mail, personal file directories, web access, and other information stored on Xebia computers, at any time and without notice, This examination ensures compliance with internal policies and assists with the management of Xebia information systems.

#### E-mail Confidentiality

Users should be aware that clear text e-mail is not a confidential means of communication. Xebia cannot guarantee that electronic communications will be private, Personnel's should be aware that electronic communications can, depending on the technology, be forwarded, intercepted, printed, and stored by others. Users should also be aware that once an e-mail is transmitted it may be altered. Deleting an e-mail from an individual workstation will not eliminate it from the various systems across which it has been transmitted.

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## Maintaining Corporate Image

### Representation

When using Xebia resources to access and use the Internet, users must realize they represent Xebia.

Whenever employees state an affiliation to Xebia, they must also clearly indicate that "the opinions expressed are my own and not necessarily those of Xebia. Questions may be addressed to the IT Department.

## Xebia Materials

Users must not place Xebia material (examples: internal memos, press releases, product or usage information, documentation, etc.) on any mailing list, public news group, or such service. Any posting of materials must be approved by the personnel's respective manager and HR and will be placed by an authorized individual.

## Creating Web Sites

All individuals and/or business units wishing to establish a WWW home page or site must first develop business, implementation, and maintenance plans. Formal authorization must be obtained through the IT Support Team. This will maintain publishing and content standards needed to ensure consistency and appropriateness.

In addition, contents of the material made available to the public through the Internet must be formally reviewed and approved before being published.

All Xebia web sites must be protected from unwanted intrusion through formal security measures which can be obtained from the IT department.

## Periodic Reviews

### Usage Compliance Reviews

To ensure compliance with this policy, periodic reviews will be conducted. These reviews will include testing the degree of compliance with usage policies.

### Policy Maintenance Reviews

Periodic reviews will be conducted to ensure the appropriateness and the effectiveness of usage policies. These reviews may result in the modification, addition, or deletion of usage policies to better suit Xebia information needs.

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