digio

Employee Cyber Security Awareness Policy

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1. Objective

- Digio Internet Private Limited. ("Digio", "Company" "we" or "us"), aims to provide a structured and systematic incident response process for any information or cyber security risks, or any crisis that may arise and affect any of our Information Technology ("IT") systems, network or data. The first step in providing an effective response to educate and create awareness among our employees. We expect employees to foster a well-organized, respectful, and collaborative environment where they grow individually and professionally and help Digio scale up to greater heights.

- Security and privacy awareness and training is an important aspect in protecting the confidentiality and integrity of information. Employees must be made aware of the security risks associated with Digio's IT infrastructure. This Employee Cyber Security Awareness Policy ("Policy") lays down a structured cyber security awareness programme which shall be undertaken by Digio's employees. The Policy is focused on developing an understanding of information security risks, policy, and how to respond to cybersecurity incidents.

- This Policy is applicable to every employee in Digio which for purposes of the Policy are referred to as "Employees" ("you", "your") across roles and functions.

- Digio may, from time to time, approve and make available more detailed or specific plans, policies, procedures, standards, or processes to address specific cyber crisis or information security issues or incident response procedures.

2. SCOPE

- This Policy establishes mandatory requirements and assigns roles and responsibilities to facilitate the implementation of a Cyber Crisis Management Plan.

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- Employees must familiarize and comply with this Policy in the performance of their duties.

- Employees who fail to abide by this Policy will be subject to disciplinary action.

3. SECURITY AWARENESS

- Digio shall ensure that all Employees undertake and complete a security awareness and training course prior to being granted access to Digio's critical and sensitive IT systems. Such employees must take a security and privacy awareness course within 30 days of being hired.

- Employees shall be provided basic security awareness training as part of employee onboarding as well as when required by changes in the IT infrastructure. All Employees must take refresher training at least annually. The training shall focus on the following aspects:
  - o use of passwords and policy regarding password length and validity;
  - o constitution of sensitive information;
  - o workplace roles and responsibilities;
  - o dealing with e-mails that contain suspicious web-links;
  - o internet and e-mail access policy;
  - o storage and deletion of physical data;
  - o physical security;
  - o identifying malicious software;
  - o threats of unauthorized access, etc.

- This training reflects Digio's security and privacy concerns including, but not limited to, physical access, restricted areas, potential incidents, best practices etc.

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- Security concerns, security incidents, or suspected/confirmed vulnerabilities will be shared with CISO immediately to ensure that the vulnerability is remediated immediately or mitigated with compensating security controls.

- Employees shall acknowledge having received the security awareness training either in writing or electronically as part of the training course completion to the Chief Information Security Officer ("CISO").

- Digio's senior management will commit to the continuous development of a security and privacy awareness program by allocating adequate staff and resources.

- Digio's senior management will ensure that all Employees work together to ensure that required security controls are in place, are maintained, and comply with this Policy.

- The CISO will update of training materials on a periodic basis. CISO will also be responsible for ensuring that all employees understand and following security related policies and procedures.

4. TRAINING

- Digio shall provide a role-based security-related training before authorizing access to its IT system. Digio shall also train its Employees if there is any change in its IT infrastructure.

- The Company shall provide appropriate security training materials to its Employee which shall detail all the procedures and activities necessary to fulfil the roles and responsibilities of the Employee.

- We will provide periodic information awareness security training opportunities and expert resources to help Employees, service providers and contractors understand their obligations under this Policy and avoid creating undue risks.

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5. PROTECTION OF COMPANY PROPERTY

- Employees are instructed to always work carefully and ensure that Company property is protected at all times. Employees are personally responsible for safeguarding, securing, and protecting the Company's assets (tangible and intangible) and information technology from theft, destruction, misappropriation, wastage, and abuse.

- Negligence, intentional, or willful destructive acts to Digio's asset will not be tolerated and may lead up to termination. Our assets include property, time, proprietary information, corporate opportunities, Company funds, and Company equipment. Intentional misuse of assets also applies to our information systems and data files. Digio reserves the right to recover the cost of damage from the Employee, if found guilty.

- Digio's assets must be used only for business purposes and to advance our strategic objectives.

- Occasional personal use of Company assets and information technology is permitted only if the employee has taken prior permission from his/her supervisor or the CISO. Personal use of company assets must not compromise Company's interests and adversely affect or result in undue abuse of the Company's resources.

6. EMPLOYEE MONITORING AT WORKPLACE

- All Digio resources are our property and may only be used for business-related purposes.

- Event Logging and Monitoring: We have implemented adequate monitoring controls to detect attacks and unauthorised access to our information processing systems.
  - The level of monitoring required shall be determined by risk assessment and any relevant or applicable legal requirements shall be identified to ensure that the monitoring activities comply with these requirements.

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- o Monitoring may consists of activities such as the review of:
    - ➢ Automated intrusion detection system logs;
    - ➢ Firewall logs;
    - ➢ User account logs;
    - ➢ Network scanning logs;
    - ➢ Application logs;
    - ➢ Help desk tickets;
    - ➢ Vulnerability Scanning; and
    - ➢ Other log and error files.
  - o Accordingly, any security issues discovered will be reported to the IT Steering Committee for investigation.

- User Monitoring: In order to maintain the security of our IT systems (including to prevent cybersecurity threats) and to protect our data and information assets, we may monitor aspects of your behaviour at the workplace including but not limited to:
  - o monitoring internet access usage;
  - o reviewing material downloaded or uploaded via the internet;
  - o monitoring e-mails sent or received by you, including both the text of an email and any attachments, provided that there is a well-founded suspicion about a breach of provisions of this Policy or of applicable laws, or if there is a legal or regulatory requirement in this respect;
  - o reviewing installed software on your computers and other IT systems used by you;
  - o logins to and use of Digio's network as well your use of Digio-issued information assets such as desktops, laptops, and other devices. Any monitoring done by us will be in accordance with the applicable law.

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- Email Monitoring:
  - Employees are not permitted to use their official email for personal purposes.
  - Emails may be automatically filtered according to the content and as a result may even be blocked from delivery.
  - Regular summary reports on email usage may be made available to the managers or supervisors. More detailed reports will be made available on request by the relevant Head of Management. Such requests to authorize access to the email inbox may be made in certain circumstances including but not limited to:
    - an Employee's extended absence from the workplace;
    - upon Employee's exit from Digio;
    - in the course of an investigation undertaken, that could potentially result in gross misconduct; or
    - in compliance with any applicable law or where there is a legal or regulatory requirement to do so.
- Only Digio-owned devices are considered trusted and can be connected directly to our servers and networks.

7. REVIEW

This Policy shall be reviewed on an annual basis by CISO and approved by the board of directors.

8. ADDITIONAL POLICIES

This Policy is not exhaustive and lays down only the general principles to be followed by Employees. The Company may have separate codes/policies formulated for regulating various matters that may be required under the specific laws. Employees shall adhere to such additional

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codes/policies as may be applicable to them. If they have any questions, they should ask their managers or Human Resources (HR) department.

9. NON COMPLIANCE

- Failure to comply with the Policy may, at the full discretion of Digio, result in the suspension of any or all technology use and connectivity privileges, disciplinary action, and possibly termination of employment.

- Digio may have to take disciplinary action against employees who repeatedly or intentionally fail to follow this, Policy. Disciplinary actions will vary depending on the violation. Possible consequences include:
  o Demotion.
  o Reprimand.
  o Suspension or termination for more serious offenses.
  o Detraction of benefits for a definite or indefinite time.

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