

## INTERNAL AUDIT REPORT

# INFORMATION SECURITY MANAGEMENT SYSTEM ISO/IEC 27001

Organization:



Audit report date:

2<sup>nd</sup> December 2024







#### 1.1 Audit objective

Evaluate compliance with the standard ISO/IEC 27001:2022, documentary support, policies and processes associated with the scope and boundaries of the ISMS.

#### 1.2 Analysis criteria

The Criteria taken into account in implementing this IA (Internal Audit) were the degree of compliance of the Information Security Management System in relation to the reference standard, ISO/IEC 27001:2022.

The scope of the ISMS:

Information security related with the development, management and support related with ADDVOLT platform, software, and services" According with the Statement of Aplicability.

#### 1.3 Date and Place

The IA took place on 21, 22 and 27 of November 2024, mainly held onsite in the ADDVOLT office (2 days) and 0,5 day remote, having analyses of processes and activities at the company's office in Águas Santas

The audit lasted an effective duration of 2.5 day.

#### 1.4 Audit Team

o Paulo Garcia Miguel (PM) - Lead Auditor

### 2. Summary

The Audit Plan was complied with and was subject to some adjustments to ensure the objectives of the audit were achieved.

The requirements and controls points of the standard have been audited, validating the application or not of such controls to the defined scope of the ISMS.

ISMS demonstrates that it is structured and documented, requiring more time to stabilise and integrate ADDVOLT's activity.

As strengths, the Audit Team points out:

- Dedication of the ISMS team
- $\bullet$  Dedication of the IT and SW Development team
- Use of new tools in the operational management of the ISMS
- Technical knowledge of relevant elements of the Organization

ADDVOLT has demonstrated the necessary skills and means to overcome the findings presented in this report easily.

The audit team appreciates the participation and contribution given by the employees contacted.

The audit team recalls that an audit is a sampling evaluation process, so it recommends evaluating other situations that may bring constraints to the implemented management system.





## 3. Âmbito da AI

|       | STANDARD CLAUSES (ISO/IEC 27001:2022)                             | AUDIT<br>SCOPE<br>(1) | NC<br>(2) | IO |
|-------|---|-----------------------|-----------|----|
| 4.1   | Understanding the organisation and its context (*)                | PM                    |           |    |
| 4.2   | Understanding the needs and expectations of stakeholders          | PM                    |           |    |
| 4.3   | Determine the scope of the information security management system | PM                    |           |    |
| 4.4   | Information security management system                            | PM                    |           |    |
| 5.1   | Leadership and commitment   | PM                    |           |    |
| 5.2   | Politics  | PM                    |           |    |
| 5.3   | Roles, responsibilities and authorities in the organization       | PM                    | 1         |    |
| 6.1   | Actions to address risks and opportunities                        | PM                    | 2         | 8  |
| 6.2   | Information security and planning objectives to achieve them      | PM                    |           |    |
| 6.3   | Planning of changes   | PM                    |           |    |
| 7.1   | Resources   | PM                    |           |    |
| 7.2   | Competence  | PM                    |           |    |
| 7.3   | Awareness   | PM                    |           |    |
| 7.4   | Communication   | PM                    |           |    |
| 7.5   | Documented information  | PM                    |           |    |
| 8.1   | Operational planning and control                                  | PM                    |           |    |
| 8.2   | Information security risk assessment                              | PM                    |           |    |
| 8.3   | Information security risk treatment                               | PM                    |           |    |
| 9.1   | Monitoring, measurement, analysis and evaluation                  | PM                    |           |    |
| 9.2   | Internal audit  | PM                    |           |    |
| 9.3   | Management review   | PM                    | 3         |    |
| 10.1  | Non-compliance and corrective action                              | PM                    |           |    |
| 10.2  | Continuous improvement  | PM                    |           |    |
| A     | Annexe A  |                       |           |    |
| 5     | Organizational controls   |                       |           |    |
| A 5.1 | Policies for information security                                 | PM                    |           |    |
| A 5.2 | Information Security Roles & Responsibilities                     | PM                    |           |    |
| A 5.3 | Segregation of Duties   | PM                    |           |    |
| A 5.4 | Management responsibilities                                       | PM                    |           |    |
| A 5.5 | Contact with authorities  | PM                    | 4         |    |
| A 5.6 | Contact with special interest groups                              | PM                    |           |    |
| A 5.7 | Threat Intelligence   | PM                    |           |    |





|           | STANDARD CLAUSES (ISO/IEC 27001:2022)                                  | AUDIT<br>SCOPE<br>(1) | NC<br>(2) | 10 |
|-----------|--|-----------------------|-----------|----|
| A 5.8     | Information security in project management                             | PM                    |           |    |
| A 5.9     | Inventory of information and other associated assets                   | PM                    |           | 9  |
| A<br>5.10 | Acceptable use of information and other associated assets              | PM                    |           |    |
| A<br>5.11 | Return of assets   | PM                    |           |    |
| A<br>5.12 | Classification of information  | PM                    |           |    |
| A<br>5.13 | Labelling of information   | PM                    |           | 10 |
| A<br>5.14 | Information transfer   | PM                    |           | 11 |
| A<br>5.15 | Access control   | PM                    |           |    |
| A<br>5.16 | Identity management  | PM                    |           |    |
| A<br>5.17 | Authentication information   | PM                    |           |    |
| A<br>5.18 | Access rights  | PM                    | 5         |    |
| A<br>5.19 | Information security in supplier relationships                         | PM                    |           |    |
| A<br>5.20 | Addressing information security within supplier agreements             | PM                    |           |    |
| A<br>5.21 | Managing information security in the ICT supply chain                  | PM                    |           |    |
| A<br>5.22 | Monitoring, review and change management of supplier services          | PM                    | 6         |    |
| A<br>5.23 | Information security for use of cloud services                         | PM                    |           | 12 |
| A<br>5.24 | Information security incident management planning and preparation      | PM                    |           |    |
| A<br>5.25 | Assessment and decision on information security events                 | PM                    |           |    |
| A<br>5.26 | Response to information security incidents                             | PM                    |           |    |
| A<br>5.27 | Learning from information security incidents                           | PM                    |           |    |
| A<br>5.28 | Collection of evidence   | PM                    |           |    |
| A<br>5.29 | Information security during disruption                                 | PM                    |           |    |
| A<br>5.30 | ICT readiness for business continuity                                  | PM                    |           | 13 |
| A<br>5.31 | Legal, statutory, regulatory and contractual requirements              | PM                    |           |    |
| A<br>5.32 | Intellectual property rights   | PM                    |           |    |
| A<br>5.33 | Protection of records  | PM                    | 7         |    |
| A<br>5.34 | Privacy and protection of PII  | PM                    |           | 14 |
| A<br>5.35 | Independent review of information security                             | PM                    |           |    |
| A<br>5.36 | Compliance with policies, rules and standards for information security | PM                    |           |    |
| A<br>5.37 | Documented operating procedures  | PM                    |           |    |





|           | STANDARD CLAUSES (ISO/IEC 27001:2022)                      | AUDIT<br>SCOPE<br>(1) | NC<br>(2) | IO |
|-----------|--|-----------------------|-----------|----|
| 6         | People Controls  |                       |           |    |
| A 6.1     | Screening  | PM                    |           |    |
| A 6.2     | Terms and conditions of employment                         | PM                    |           |    |
| A 6.3     | Information security awareness, education and training     | PM                    |           |    |
| A 6.4     | Disciplinary process                                       | PM                    |           |    |
| A 6.5     | Responsibilities after termination or change of employment | PM                    |           |    |
| A 6.6     | Confidentiality or non-disclosure agreements               | PM                    |           |    |
| A 6.7     | Remote working   | PM                    |           |    |
| A 6.8     | Information security event reporting                       | PM                    |           |    |
| 7         | Physical Controls  |                       |           |    |
| A 7.1     | Physical security perimeters                               | PM                    |           |    |
| A 7.2     | Physical entry   | PM                    |           |    |
| A 7.3     | Securing offices, rooms and facilities                     | PM                    |           |    |
| A 7.4     | Physical security monitoring                               | PM                    |           |    |
| A 7.5     | Protecting against physical and environmental threats      | PM                    |           |    |
| A 7.6     | Working in secure areas                                    | PM                    |           |    |
| A 7.7     | Clear desk and clear screen                                | PM                    |           |    |
| A 7.8     | Equipment siting and protection                            | PM                    |           |    |
| A 7.9     | Security of assets off-premises                            | PM                    |           |    |
| A<br>7.10 | Storage media  | PM                    |           |    |
| A<br>7.11 | Supporting utilities                                       | PM                    |           | 15 |
| A<br>7.12 | Cabling security   | PM                    |           |    |
| A<br>7.13 | Equipment maintenance                                      | PM                    |           |    |
| A<br>7.14 | Secure disposal or re-use of equipment                     | PM                    |           |    |
| 8         | Technological Controls                                     |                       |           |    |
| A 8.1     | User endpoint devices                                      | PM                    |           |    |
| A 8.2     | Privileged access rights                                   | PM                    |           |    |
| A 8.3     | Information access restriction                             | PM                    |           | 16 |
| A 8.4     | Access to source code                                      | PM                    |           |    |
| A 8.5     | Secure authentication                                      | PM                    |           |    |
| A 8.6     | Capacity management  | PM                    |           |    |
| A 8.7     | Protection against malware                                 | PM                    |           |    |
| A 8.8     | Management of technical vulnerabilities                    | PM                    |           | 17 |
| A 8.9     | Configuration management                                   | PM                    |           |    |





|           | STANDARD CLAUSES (ISO/IEC 27001:2022)                       | AUDIT<br>SCOPE<br>(1) | NC<br>(2) | IO |
|-----------|---|-----------------------|-----------|----|
| A<br>8.10 | Information deletion  | PM                    |           |    |
| A<br>8.11 | Data masking  | PM                    |           |    |
| A<br>8.12 | Data leakage prevention                                     | PM                    |           |    |
| A<br>8.13 | Information backup  | PM                    |           |    |
| A<br>8.14 | Redundancy of information processing facilities             | PM                    |           |    |
| A<br>8.15 | Logging   | PM                    |           |    |
| A<br>8.16 | Monitoring activities                                       | PM                    |           |    |
| A<br>8.17 | Clock synchronization                                       | PM                    |           |    |
| A<br>8.18 | Use of privileged utility programs                          | PM                    |           |    |
| A<br>8.19 | Installation of software on operational systems             | PM                    |           |    |
| A<br>8.20 | Networks security   | PM                    |           |    |
| A<br>8.21 | Security of network services                                | PM                    |           |    |
| A<br>8.22 | Segregation of networks                                     | PM                    |           |    |
| A<br>8.23 | Web filtering   | PM                    |           |    |
| A<br>8.24 | Use of cryptography   | PM                    |           |    |
| A<br>8.25 | Secure development life cycle                               | PM                    |           |    |
| A<br>8.26 | Application security requirements                           | PM                    |           |    |
| A<br>8.27 | Secure system architecture and engineering principles       | PM                    |           |    |
| A<br>8.28 | Secure coding   | PM                    |           |    |
| A<br>8.29 | Security testing in development and acceptance              | PM                    |           |    |
| A<br>8.30 | Outsourced development                                      | PM                    |           |    |
| A<br>8.31 | Separation of development, test and production environments | PM                    |           |    |
| A<br>8.32 | Change management   | PM                    |           |    |
| A<br>8.33 | Test information  | PM                    |           |    |
| A<br>8.34 | Protection of information systems during audit testing      | PM                    |           |    |



<sup>(1)</sup> Include the acronyms of the EA element(s) that audited the clause or (2) Indicate the sequential number assigned to the Non-Compliance(s) - NC or to the Opportunities for Improvement in the clauses in which they are verified.



## 4. Findings

| N°. | Class. | ISO/IEC<br>27001 | Findings   |
|-----|--------|------------------|--|
| 1   | NC     | 5.3              | It was not defined some critical job profiles or responsibilities. Ex. ISMS Manager,   |
| 2   | NC     | 6.1              | The identification of Risks and Opportunities as a result of the SWOT Analysis for Information Security was not carried out. |
| 3   | NC     | 9.3              | The management review is not yet be done.  |
| 4   | NC     | A.5.5            | Has not been formal defined who should communicate with legal entities.  |
| 5   | NC     | A.5.18           | There was no evidence of digital access being reviewed.  |
| 6   | NC     | A.5.22           | The suppliers of critical services are not yet evaluated.  |
| 7   | NC     | A.5.33           | It is not clearly defined the protection time for the relevant information records.  |
| 8   | 10     | 6.1.3            | Complete the information in the SoA - Statement of applicability   |
| 9   | 10     | A.5.9            | The assets Inventory should be reviewed to identify the relevant Information Assets.   |
| 10  | 10     | A.5.13           | Clarify the process of classifying and labelling documents of external origin.  All the documents should be lebelling,       |
| 11  | 10     | A.5.14           | Clarify the transfer rules for use the MsTeams to transfer information and approve the policy.                               |
| 12  | 10     | A.5.23           | It must ensure that the Factorial HR answer to the cloud services qualification survey.                                      |
| 13  | 10     | A.5.30           | It should be tested the Business Continuity Scenarios.   |
| 14  | IO     | A.5.34           | It would be beneficial to define the data retention period for candidate applications in the privacy policy.                 |





| 15 | IO | A.7.11 | A system for saving the communications system from power cuts must be implemented                                       |
|----|----|--------|---|
| 16 | IO | A.8.3  | The information management process must allow for appropriate access management by user or group of users.              |
| 17 | IO | A.8.8  | It should be clarified in the policy that when we cannot resolve the vulnerability directly, it is planned in a ticket. |

Matosinhos, 2 December 2024 Lead Auditor

