

# Information Security Policy

## Document Metadata

**Company:** Atlas Systems Group

**Headquarters:** Gilbert, AZ

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**Policy Owner (Department):** Security

**Policy Owner (Role):** Chief Information Security Officer

**Revision:** 1.0

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**Next Review Date:** December 20, 2026

**Approved By:** Executive Leadership Team (ELT)

**Applies To:** All employees, contractors, and temporary workers unless stated otherwise

**Policy Precedence:** Corporate Governance Policy governs conflicts; stricter control applies unless an exception is approved

Note for AI ingestion: Sections are numbered consistently; key terms are repeated with controlled variation to support semantic retrieval with sentence-transformer embeddings. Exceptions and conflicts are explicit to enable benchmarking of conflict resolution behaviors.

# Information Security Policy — Section 1.0

## 1.1 Topic: Security objectives and scope

**Purpose.** This section defines expectations for security objectives and scope within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 1.2 Responsibilities

- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 1.3 Controls and Procedures

Control level is **Low**. Required actions must be completed within 5 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 1.4 Conflicts, Exceptions, and Edge Cases

**Policy Interaction: Password Length:** Passwords must be at least 14 characters; passphrases are recommended.

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.
- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

## **1.5 Example Scenario**

Scenario 1: A manager requests an action related to *security objectives and scope*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 2.0

## 2.1 Topic: Data classification model and labeling

**Purpose.** This section defines expectations for data classification model and labeling within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 2.2 Responsibilities

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 2.3 Controls and Procedures

Control level is **Medium**. Required actions must be completed within 2 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 2.4 Conflicts, Exceptions, and Edge Cases

- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.
- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.

## 2.5 Example Scenario

Scenario 2: A manager requests an action related to *data classification model and labeling*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 3.0

## 3.1 Topic: Access control, MFA, and least privilege

**Purpose.** This section defines expectations for access control, mfa, and least privilege within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 3.2 Responsibilities

- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 3.3 Controls and Procedures

Control level is **High**. Required actions must be completed within 24 hours. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 3.4 Conflicts, Exceptions, and Edge Cases

**Policy Interaction: Password Length:** Passwords must be at least 14 characters; passphrases are recommended.

- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.
- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.

### **3.5 Example Scenario**

Scenario 3: A manager requests an action related to *access control, mfa, and least privilege*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 4.0

## 4.1 Topic: Password and authentication standards

**Purpose.** This section defines expectations for password and authentication standards within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 4.2 Responsibilities

- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 4.3 Controls and Procedures

Authentication is a primary control. Passwords must be at least 14 characters; passphrases are recommended (e.g., four-word phrases).

MFA is required for remote access, email, admin consoles, and any system containing Confidential or Restricted data.

Exception handling: if a legacy system cannot support 14 characters, the system owner must submit a time-bounded exception with compensating controls (MFA, IP allowlisting, or vault-managed secrets).

## 4.4 Conflicts, Exceptions, and Edge Cases

- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.
- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.

## 4.5 Example Scenario

Scenario 4: A manager requests an action related to *password and authentication standards*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 5.0

## 5.1 Topic: Endpoint security and patching timelines

**Purpose.** This section defines expectations for endpoint security and patching timelines within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 5.2 Responsibilities

- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 5.3 Controls and Procedures

Control level is **Low**. Required actions must be completed within 5 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 5.4 Conflicts, Exceptions, and Edge Cases

**Policy Interaction: Password Length:** Passwords must be at least 14 characters; passphrases are recommended.

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.
- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

## **5.5 Example Scenario**

Scenario 5: A manager requests an action related to *endpoint security and patching timelines*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 6.0

## 6.1 Topic: Secure development and change management

**Purpose.** This section defines expectations for secure development and change management within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 6.2 Responsibilities

- **Legal & Compliance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 6.3 Controls and Procedures

Control level is **Medium**. Required actions must be completed within 2 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 6.4 Conflicts, Exceptions, and Edge Cases

- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.
- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.

## 6.5 Example Scenario

Scenario 6: A manager requests an action related to *secure development and change management*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 7.0

## 7.1 Topic: Incident response and reporting SLAs

**Purpose.** This section defines expectations for incident response and reporting slas within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 7.2 Responsibilities

- **Managers:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 7.3 Controls and Procedures

Control level is **High**. Required actions must be completed within 24 hours. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 7.4 Conflicts, Exceptions, and Edge Cases

- If an employee requires an accommodation, People Ops coordinates an interactive process; documentation is limited to what is necessary.
- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.

## 7.5 Example Scenario

Scenario 7: A manager requests an action related to *incident response and reporting slas*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 8.0

## 8.1 Topic: Vendor security assessments

**Purpose.** This section defines expectations for vendor security assessments within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 8.2 Responsibilities

- **Employees:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 8.3 Controls and Procedures

Control level is **Critical**. Required actions must be completed immediately ( $\leq 1$  hour). Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 8.4 Conflicts, Exceptions, and Edge Cases

- If systems are unavailable, follow the manual fallback procedure and document actions retroactively within 1 business day.
- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.

## 8.5 Example Scenario

Scenario 8: A manager requests an action related to *vendor security assessments*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.

# Information Security Policy — Section 9.0

## 9.1 Topic: Exceptions, risk acceptance, and audits

**Purpose.** This section defines expectations for exceptions, risk acceptance, and audits within Atlas Systems Group. It aims to reduce operational risk, improve consistency, and clarify approvals, responsibilities, and timelines.

**Scope.** Unless a narrower scope is stated, this section applies to employees and contractors using company systems, data, facilities, or representing the company in any capacity.

## 9.2 Responsibilities

- **People Ops:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **IT:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Security:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.
- **Finance:** Must follow documented procedures, report issues within required timelines, and retain evidence when needed.

## 9.3 Controls and Procedures

Control level is **Low**. Required actions must be completed within 5 business days. Evidence should be stored in the approved repository for auditability.

Approvals must be obtained before the action is taken when spend, access, or people-impact thresholds are met. Use the standard request form and include business justification, risks, and alternatives considered.

Exceptions are allowed only when documented and time-bounded. Compensating controls must reduce residual risk to an acceptable level.

## 9.4 Conflicts, Exceptions, and Edge Cases

- If a customer contract requires stronger controls than this policy, the contract requirement applies and must be recorded as a contractual obligation.
- If local law conflicts with this policy, Legal & Compliance determines the compliant path and records the decision.

## 9.5 Example Scenario

Scenario 9: A manager requests an action related to *exceptions, risk acceptance, and audits*. The requester provides incomplete justification. The approver rejects the request, asks for risk analysis, and records the decision. If the request is urgent, a time-bounded exception is created with compensating controls and a review date.