Information Security Roles and Responsibilities

Policy Owner: Mark Kelly

Effective Date: Nov 13, 2024

Statement of policy

NewEdge Growth LLC is committed to conducting business in compliance with all applicable laws, regulations, and company policies. NewEdge Growth LLC has adopted this policy to outline the security measures required to protect electronic information systems and related equipment from unauthorized use.

Objective

This policy and associated guidance establish the roles and responsibilities within NewEdge Growth LLC, which is critical for effective communication of information security policies and standards. Roles are required within the organization to provide clearly defined responsibilities and an understanding of how the protection of information is to be accomplished. Their purpose is to clarify, coordinate activity, and actions necessary to disseminate security policy, standards, and implementation.

Applicability

This policy is applicable to all NewEdge Growth LLC infrastructure, network segments, systems, and employees and contractors who provide security and IT functions.

Audience

The audience for this policy includes all NewEdge Growth LLC employees and contractors who are involved with the Information Security Program. Awareness of this policy applies for all other agents of NewEdge Growth LLC with access to NewEdge Growth LLC information and infrastructure. This includes, but is not limited to partners, affiliates, contractors, temporary employees, trainees, guests, and volunteers. The titles will be referred collectively hereafter as "NewEdge Growth LLC community".

Roles and responsibilities

Roles	Responsibilities
Executive Leadership	• Oversight of Cyber-Risk and internal control for information security, privacy and compliance • Consults with Executive Leadership to understand NewEdge Growth LLC IT mission and risks and provides guidance to align business, IT, and security objectives
Executive Leadership	• Approves Capital Expenditures for Information Security and Privacy programs and initiatives • Oversight over the execution of the information security and Privacy risk management program and risk treatments • Communication Path to NewEdge Growth LLC Board of Directors • Aligns Information Security and Privacy Policy and Posture based on NewEdge Growth LLC's mission, strategic objectives and risk appetite
CEO	• Oversight over the implementation of information security controls for infrastructure and IT processes • Responsible for the design, development, implementation, operation, maintenance and monitoring of IT security controls • Ensures IT puts into practice the Information Security Framework • Responsible for conducting IT risk assessments, documenting identified threats and maintaining risk register • Communicates information security risks to executive leadership • Reports information security risks annually to NewEdge Growth LLC's leadership and gains approvals to bring risks to acceptable levels • Coordinates the development and maintenance of information security policies and standards • Works with applicable executive leadership to establish an information security framework and awareness program • Serve as liaison to the Board of Directors, Law Enforcement, Internal Audit and General Counsel • Oversight over Identity Management and Access Control processes
CEO	• Oversight over information security in the software development process • Responsible for the design, development, implementation, operation, maintenance and monitoring of development and commercial cloud hosting security controls • Responsible for oversight over policy development related to systems and software under their control • Responsible for implementing risk management in the development process aligned with company goals
CEO	• Responsible for compliance with the company's contractual commitments • Responsible for maintaining compliance with relevant data privacy and information security laws and regulations (e.g. GDPR, CCPA) • Responsible for adherence to company adopted information security and data privacy standards and frameworks including SOC 2, ISO 27001 and Microsoft Supplier Data Protection Requirements (DPR)
Chief Strategy Officer	• Oversight and implementation, operation and monitoring of information security tools and processes in customer production environments

	• Execution of customer data retention and deletion processes in accordance with company policy and customer requirements
CEO	• Maintain the confidentiality, integrity and availability of the information systems for which they are responsible in compliance with NewEdge Growth LLC policies on information security and privacy • Approval of technical access and change requests for non-standard access to systems under their control
Employees, Contractors, temporary workers, etc.	• Acting at all times in a manner which does not place at risk the health and safety of themselves, other person in the workplace, and the information and resources they have use of • Helping to identify areas where risk management practices should be adopted • Taking all practical steps to minimize NewEdge Growth LLC's exposure to contractual and regulatory liability • Adhering to company policies and standards of conduct • Reporting incidents and observed anomalies or weaknesses
CEO	• Ensuring employees and contractors are qualified and competent for their roles • Ensuring appropriate testing and background checks are completed • Ensuring that personnel and relevant contractors are presented with company policies and the Code of Conduct (CoC) • Ensuring that employee performance and adherence the CoC is periodically evaluated • Ensuring that personnel receive appropriate security training
CEO	• Responsible for oversight over third-party risk management process • Responsible for review of vendor service contracts

Policy compliance

The CEO will measure the compliance to this policy through various methods, including, but not limited to—reports, internal/external audits, and feedback to the policy owner. Exceptions to the policy must be approved by the CEO in advance. Non-compliance will be addressed with management and Human Resources and can result in disciplinary action in accordance with company procedures up to and including termination of employment.

Version history

Version	Date	Description	Author	Approver
1.0	Nov 13, 2024	Version 1.0	Mark Kelly	Mark Kelly