

INFORMATION SECURITY POLICY (GIT-POL01)

Gamuda Berhad

Menara Gamuda, PJ Trade Centre, No.9, Jalan PJU 8/8A, Bandar Damansara Perdana, 47820 Petaling Jaya, Selangor



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REVISION HISTORY

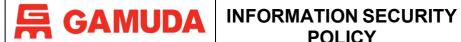
DATE	REV.NO.	PAGE	DESCRIPTION
13/02/2017	00	All	Original documents
03/07/2023	01	All	Upgrade to ISO/IEC 27001:2022
17/10/2023	02	13	2.0 Information Security Policy Statement - amendment made based on findings from Stage 1 CB Audit.
15/11/2024	03	25,26, 28,32, 40, 62	Removal of the word "Restricted" in the affected clauses



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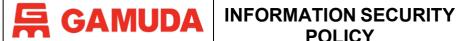
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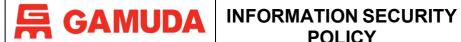
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1.0 GENERAL

This Information Security Policy provides the Gamuda Group employees and third parties with a consistent set of security rules required to protect the company's information, information assets and intellectual property.

The rule set forth in the Policy document has been defined to provide reasonable controls for protecting the company from a wide variety of security threats which could cause harm to Gamuda Group business activities. Defining and implementing Policy are one of the security layers that need to be put in place in order to safeguard the organization from traditional and cyber threats and vulnerabilities.

1.1 Definition of the Policy

The information security Policy is the management instructions indicating a course of action, a guiding principle, or an appropriate procedure, which is expedient, prudent, or advantageous. This Policy high-level statements that provide guidance to the organizational activities.

Policy(s) are mandatory. View it as the equivalent of an organization-specific law. Hence compliance with a control practice is required.

Policy(s) are also different from 'procedure'. A Policy statement describes the general means for addressing a specific problem (a 'high-level approach') and should not become detailed and lengthy.

1.2 Scope of the Policy

This document deals with Information Security issues related to the corporate environment of the company, i.e. any activity that protects information and/or information assets of the company. The control practice apply to the security principles of confidentiality, integrity, and availability of information obtained, created, or maintained by the employees or non-employees (third party's) accessing the company information asset.

2.0 INFORMATION SECURITY POLICY STATEMENT

It is the policy of Gamuda Group to ensure that information is properly managed, appropriately secured and protected against the consequences of breaches of confidentiality, failures of integrity or interruptions due to the availability of that information. The Management of Gamuda Group is committed to ensure that:

• The confidentiality of information is protected to prevent disclosure of valuable or sensitive information:



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- Information is available with minimal disruption to authorised users to meet client's and business' requirements;
- The integrity of information is maintained to ensure its accuracy and completeness; Information Security education, awareness and training will be made available to users to ensure responsible participation;
- All breaches of information security, actual or suspected, will be reported. All users must understand their roles and responsibilities in handling incidents;
- Information Security Risks, Cybersecurity Risks and Data Privacy Risks are mitigated to an acceptable level through an Information Security Risk Management Framework;
- Appropriate security & permission controls will be jointly maintained by Group IT, respective Business Units and parties who are related to the Group either internal or externally;
- Appropriate resources are allocated in order to implement, operate and review an effective Information Security Management System;
- Disruption to information processing facilities will be minimised. Readiness should be ensured via regular testing based on prevailing risks; Regulation and legal requirements on Information Security related to The Group are met; and
- The Information Security Management System is continually improved.

The Group shall follow a formal disciplinary process for employees who have allegedly violated the information security policies and procedures.

3.0 INFORMATION SECURITY MANAGEMENT OBJECTIVES

The purpose of Information Security Management is to protect all information assets of Gamuda Group, either electronic or paper, from all threats, whether internal or external, deliberate or accidental.

Gamuda Group through implementation of ISMS will ensure the following objectives:

- To protect Information Assets (digitized or paper) against unauthorised access or disclosure through deliberate or careless action
- To ensure Integrity of information through protection from unauthorised modification
- To ensure availability of information to authorised users when required
- To safe guard IT Systems in support of business operation through effective controls
- To comply with all Contractual, Regulatory and Legislative requirements
- To allocate appropriate level of Information Security in the job responsibilities
- To provide information security awareness and training to all employees



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To investigate and report and handle information security incidents

The intention of Gamuda Group is to implement ISMS within the IT department. The detail scope of ISMS, specification and boundaries is further defined in the ISMS Manual.

Selection of the scope is based on IT department business-critical functions in Gamuda Group. This is complemented with the level of Confidentiality, Integrity and Availability of information in each business services.

4.0 RESPONSIBILITIES

The IT Governance Unit has direct responsibility on the overall maintenance of the information security Policy and providing advice and guidance on implementation and directly responsible for maintaining the codes and providing advice and guidance on company implementation.

The Units Heads in IT department are directly responsible for implementing the policy within their business areas, and for adherence by all their staff.

Staff should know, understand, and be held accountable for fulfilling their information security responsibilities.

5.0 INTENDED AUDIENCE

- 1. All employees of IT Department, Gamuda Group
- 2. Authorized Third Party (with authorization from relevant Units Heads)

Any person(s) not listed above are not authorized to examine the contents of this document. Doing so would constitute a breach of security that may be subjected to appropriate actions being taken against the offender.

6.0 COVERAGE OF THIS DOCUMENT

This ISP statement covers the full range of Policy statements in mitigating risks associated with creating, amending, storing or disseminating information. This document consists of information security domains related to:

- 1. Information Security Policy Statement
- 2. Organization of Information Security
- 3. Information & Processing Devices Asset Management
- 4. Information Security related to Human Resources
- 5. Information Security related to Physical and Environmental



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- 6. Information Security related to IT Operations & Network
- 7. Information System Access Control
- 8. Information System Acquisition, Development and Maintenance
- 9. Information Security Incident Management
- 10. Information Security related to Business Continuity Management
- 11. Information Security related to Legal and Contractual Compliance

7.0 HOW TO READ THIS CONTROL PRACTICE STATEMENTS

Each of the areas consists of at least one (1) security objective, and each security objective consists of at least one (1) policy statement.

Example:

There shall be appropriate contacts with information service providers and telecommunication operators, enforcement authorities such as Police, Cybersecurity Malaysia to ensure that appropriate action can be quickly taken and advice obtained, in the event of a information security incident.	
	GC

ISP Statement

Group / Individual

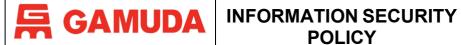
Explanation:

ISP		Information Security Policy
060106	:	The first two digits are for the major topic number, second two digits are for the security objective, and third two digits are the policy number.
ISP Statement		The description of the ISP statement.
Group / Personnel	:	The personnel or group of people affected by the policy statement, who may be considered as owners of specific policy statements.



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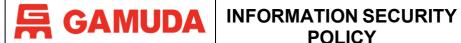
DOMAIN 01 - INFORMATION SECURITY POLICY STATEMENT			
Objective: In	formation Security Control Statement		
Description	To provide management direction and support for information security.		
ISP-010101	Endorsement for Policy		
	This Policy shall be approved by the Chief Digital Officer	ITGC	
ISP-010102	Maintenance Role		
	The maintenance and review of this Policy is by GIT with coordination of ITGC.	GIT, ITGC	
ISP-010103	ISP review		
	The ISP shall be reviewed and maintained periodically in response to any changes affecting the basis of the original risk assessment, periodic audit or in response to requests from within the organization.	GIT, ITGC	
	At a minimum a comprehensive annual review must be carried out. The periodic review may include the following:		
	The policy's effectiveness, demonstrated by the nature, number and impact of recorded security incidents,		
	Cost and impact of controls on business efficiency, and		
	3. Effects of changes to technology.		
ISP-010104	Exception to ISP		
	If an exception is required for ISP, a written request which includes a description of and justification for the exception/change should be brought forward to ITGC for approvals.		
	ITGC should retain all such requests, for future reference.		
ISP-010105	User awareness on ISP		
	The ISP must be communicated throughout Gamuda Group to employees in a form that is relevant, accessible and understandable to the intended readers.	Training, ITGC, GIT and Project Owner	



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	Training Unit is responsible in arranging and coordinating for new recruits on this ISP also The Training Unit is responsible in arranging and coordinating a yearly refresher awareness program on ISO related policies and procedures for existing users.		
	For communication to external parties - the respective Project Owner is responsible to make aware on relevant control practice in this ISP to third parties.		
ISP-010106	ISP-010106 Enforcement of ISP		
	Employees are advised to observe the rules and take initiatives in supporting organization efforts. The Unit Heads are responsible in enforcing the ISP throughout his/her jurisdiction.	All Unit Heads	

DOMAIN 02	DOMAIN 02 - ORGANIZATION OF INFORMATION SECURITY		
Objective: In	Objective: Information Security Infrastructure		
Description	To establish a management framework for the implementation of information security within Gamuda Group and to assign roles and responsibilities for the management of information security.		
ISP-020101	Information Security is every employee's duty		
	All employees of Gamuda Group must review, understand and comply with their information security responsibilities. Should employees unclear on their responsibilities they are responsible to seek clarification from their superior. All employees are required to protect Gamuda Group information assets (i.e. information, resources, and reputation).	ALL	
ISP-020102	Centralized management of Information Security		
	Guidance, direction and authority for detailed implementation of information security activities are centralized for Gamuda Group within ITGC and GIT.	ITGC, GIT	
ISP-020103	CDO responsibilities (information security-related)		



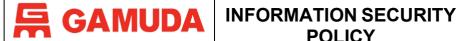
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	The CDO is responsible to:	CDO
	 Provide clear direction to the overall Information security implementation with the advice of Head of ITGC 	
	Ensure all information security control practice, standards and procedures are established, enhanced and complied with at all times.	
ISP-020104	ISMS Committee responsibilities (information secur	ity-related)
	The ISMS Committee comprises of Information Security Management Representative (ISMR) and Committee Member.	ITGC, ITAM
	The committee is responsible to:	
	 Define Gamuda Group information security goals 	
	Formulate appropriate information security control practice to reach the goals	
	Evaluate results of information security risk management program	
	4. Review major Information Security Incidents.	
	Evaluate results of security effectiveness program periodically	
	 Perform management review for Information Security Management System at least once a year in accordance to the relevant clauses in ISO 27001 	
ISP-020105	IT Governance responsibilities (information security	/-related)
	The IT Governance and Compliance of GIT is responsible to:	ITGC
	 Provide input and influence over the direction of the information security program. 	
	Set and recommend priorities on information security efforts.	
	 Recommend to the ISMS Committee on information security projects in reducing the organizational information security risk through implementation of acceptable controls. 	



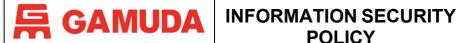
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	Monitor deliverables produced through the information security program.	
	Conduct review of the ISP, supporting procedures, and review of the implementation and subsequent enforcement of the policies.	
	Discuss and identify probable improvement on the practical ability to support the ISP.	
	Establish buy-in for subsequent support of implementation activities.	
	Monitor effectiveness of security controls and information security risk mitigation within ISMS implementation.	
ISP-020106	Group Information Technology (GIT) responsibilities security related)	s (information
	The GIT has primary responsibilities for the day-to-day management of Gamuda Group technological information security processes.	GIT
	The following are the responsibilities of the GIT.	
	 Oversee the administration of logical access controls. To ensure adequate access controls are implemented on new system or during system maintenance based on Business Owner's requirements. GIT is responsible on the Group level for the administration of logical access controls for all IT system and monitoring access violation based on Business Owners initiation and approval. 	
	Provide advice and guidance on the development, maintenance and implementation of ISP.	
	Providing technical and operational management support for a wide variety of information system projects and activities.	
	Configuring and updating workstations, servers, networks, and other information system equipment used in support of business Gamuda Group activities.	
	 Maintain system in a corrective and preventive manner, so that all applications critical to the business are adequately supported, so that 	



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	response time and availability is within tolerable limits, and that security vulnerabilities are minimized.	
	 Manage third parties and relevant contracts providing services to develop, support, or maintain hardware and system to achieve the above objectives. 	
	 Provide a central point to track and escalate system problems and incidents, as well as to ensure timely responses for resolutions. 	
	8. Review adequacy of the IT Disaster Recovery Plan (DRP) to allow recovery from a system failure and in the event of a disaster resulting in a loss of the information technology services.	
	Assurance of the monitoring on the supply of electricity to Data Centre.	
	 Assurance on the maintenance of fire extinguisher, fire suppression system for work areas and Data Centre. 	
ISP-020107	Risk Management responsibilities (information secu	rity related)
		_
	The following are the responsibilities that to be taken:	ITGC
	The following are the responsibilities that to be taken: 1. Coordinate and ensure the Risk Management and Mitigation for information security are satisfactorily implemented by all departments within the scope of ISMS in Gamuda Group.	ITGC
	Coordinate and ensure the Risk Management and Mitigation for information security are satisfactorily implemented by all departments	ITGC
	 Coordinate and ensure the Risk Management and Mitigation for information security are satisfactorily implemented by all departments within the scope of ISMS in Gamuda Group. Review adequacy of the Business Continuity Plan (BCP) to allow recovery and in the event of a disaster resulting in a loss of business 	ITGC
	 Coordinate and ensure the Risk Management and Mitigation for information security are satisfactorily implemented by all departments within the scope of ISMS in Gamuda Group. Review adequacy of the Business Continuity Plan (BCP) to allow recovery and in the event of a disaster resulting in a loss of business services. Provide advice and guidance on the development, maintenance and implementation of Risk Management and Business Continuity 	ITGC
ISP-020108	 Coordinate and ensure the Risk Management and Mitigation for information security are satisfactorily implemented by all departments within the scope of ISMS in Gamuda Group. Review adequacy of the Business Continuity Plan (BCP) to allow recovery and in the event of a disaster resulting in a loss of business services. Provide advice and guidance on the development, maintenance and implementation of Risk Management and Business Continuity Plan. 	ITGC



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	 Providing necessary advice to conduct Gamuda Group business activities in a manner fully in comply with existing laws and regulations. 	
	Providing advice on compliance, regulations and contractual relationships that can be used to further Gamuda Group business interests.	
	 Providing Gamuda Group with advice against legal risks to appropriately protect Gamuda Group information assets, resources and employee. 	
	 To ensure the monitoring and compliance to Personal Data Protection Act for Gamuda Group. 	
ISP-020109	Human Resource and Admin responsibilities (information security related)	mation
	The following are the responsibilities that to be taken:	GHR
	 Screening on new recruits in relation to the job placement as to minimize threats from them in protecting organization information assets. 	
	Provide administrative support to keep and maintain the records needed to be in compliance with all human resources related laws, regulations and internal policies, and	
	 Coordinate the retention and termination of all Gamuda Group employees and return of assets. 	
	The Infra unit is responsible with the following:	INFRA UNIT
	 Assurance on the preservation of information security at the record storage centre via Crown Records. 	
	The Admin department is responsible with the following:	ADMIN DEPARTMENT
	 Ensure the security and physical access control for Gamuda Group. Administration, management, installation, monitoring and review CCTV images. 	



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	 Access control and the use of card access for physical access control to Gamuda Group buildings via card system. 	
ISP-020110	IT Procurement and Asset Unit responsibilities (inforelated)	ormation security
	The IT Procurement and Asset Unit is responsible to:	ITAM
	Ensure the IT Procurement Process as per the IT Procurement Procedure.	
	Ensure selected vendors adhere to Gamuda Group NDA.	
ISP-020111	Information Asset ownership and management's res	sponsibilities
	All Information & Processing assets used by each unit/department must have a designated owner. Employee must aware the asset owners and assigning responsibility for the control of asset.	ALL
ISP-020112	IT asset inventory	
	IT will maintain accurate inventory records of all IT assets procured by the company. Information recorded includes date of purchase, price of item, name and address of vendor, warranty period etc.	ITAM
	IT will maintain accurate assets records of all current location and individual or department to whom the asset has been assigned. Information recorded includes date of purchase, price of item, asset identification number, name of asset, name and address of custodian.	
	All inventory records will be maintained and monitored in an inventory system.	
	Information assets and processing related assets will be documented.	
ISP-020113	Information Asset owner's security responsibilities	
	Information asset owners must determine appropriate sensitivity classifications for information assets. Information asset owners must also make decisions about who will be permitted to access the information and the uses of this information. Information asset	Asset Owner



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	owners must ensure appropriate handling is complied with.		
ISP-020114	ISP-020114 Information Asset custodian's security responsibilities		
	Information asset custodians are responsible to define specific control (e.g. access control), implementation and maintenance measures, and provide recovery capabilities consistent with the instructions of information asset owner.	Information Asset Custodians, GIT	
ISP-020115	Information Asset user's security responsibilities		
	All users of Gamuda Group' information assets must comply with the control requirements specified by the asset owner / asset custodian. Users may be employees, temporaries, consultants, contractors, or third parties with whom special arrangements have been made.	ALL	
ISP-020116	Authorization for information processing facilities		
	The use of new information processing system (both hardware devices and software packages) or significant change of existing information processing system shall be authorized by Head of Global Infra.	Head of Global Infra	
Objective: O	utsourcing and Third Party Contracts		
Description	To maintain the security of Gamuda Group information pand assets accessed by third parties or outsourcing ven security of information when the responsibility for inform has been outsourced to another organization.	dors. Maintain the	
ISP-020201	Security Requirements in Outsourcing and Third Pa	rty Contracts	
	The security requirements of Gamuda Group outsourcing the management and control for all or some of information system, networks and/or desktop environments, or other activities must be addressed in a contract agreed between the parties.	Project Owner, GIT, ITGC, Cybersecurity	
	The person in charge need to consider the minimum- security criteria.		
ISP-020202	Non-Disclosure Agreements		
	Employees must not disclose sensitive information to consultants, contractors, or third parties before receipt of a signed non-disclosure agreement.	ALL	



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ISP-020203	Handling Risks Associated with Outsourcing of Information Services	
	The contract for outsourcing arrangements must adhere to Gamuda Group Information Security Policy.	ALL
ISP-020204	Return of Gamuda Group Information Assets	
	All Gamuda assets must be returned upon completion of work and adhere to Information Security Policy.	ITAM

DOMAIN 03	- INFORMATION & PROCESSING DEVICES ASSET MA	ANAGEMENT	
Objective: A	Objective: Accountability for Information Assets		
Description	To maintain appropriate protection of organizational information assets.		
ISP-030101	Inventory of Information & processing devices assets		
	An inventory of information assets in Gamuda Group is using IT inventory system.	ITAM	
ISP-030102	Categories of IS assets		
	Inventory of IT assets in Gamuda Group consist of: 1. Data and information 2. People 3. Software 4. Hardware/physical 5. Services	ITAM	
Objective: In	formation Classification and Handling		
Description	To ensure that information assets receive an appropriate	e level of protection.	
ISP-030201	Information classification scheme		
	The information asset is classified to indicate the need, priorities and degree of protection. The asset owner is required to define the classification of information during its creation. These classifications are defined as: 1. Confidential. 2. Internal Use. 3. Public Information.	ALL	



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ISP-030202	Information labelling	
	All information must be labelled with an appropriate data classification according to the classification scheme. Such markings must appear at all manifestations of documented information (digitised or hardcopy).	ALL
ISP-030203	Third party interactions	
	Unless it has specifically been designated as Public Information , or intended for public use, all internal information must be protected from disclosure to third parties. Third parties may be given access to Gamuda Group internal information only when a demonstration of a need-to-know basis exists.	ALL
ISP-030204	Prior review	
	Every speech, presentation, technical paper, book, or other communications to be delivered to the public media must first be approved for release by the Group Corporate Communications Department (GCC).	ALL, GCC
ISP-030205	Information handling	
	All the following types of information processing activity:	ALL
	 Copying Storage. Transmission by spoken word, post, fax and electronic mail. Destruction Shall adhere to the handling specified in Information Handling Procedure 	
ISP-030206	Information Retention & Reuse	
	All information that is classified Confidential and Internal Use regardless the medium shall be deposited and stored into the approved storage location. The reuse of inactive information and records shall be controlled. The preservation, storage and retrieval should comply to international standard and best practice.	ALL



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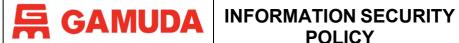
DOMAIN 04	- INFORMATION SECURITY RELATED TO HUMAN RES	SOURCE
Objective: Training Awareness		
Description	To reduce the risks of human error, theft, fraud or misuse of facilities.	
ISP-040101	Information security training	
	All employees must be provided with adequate awareness & training to allow them to properly protect/use Gamuda Group information resources. New employees must be briefed and made aware of their security obligations.	GIT Training and Recruitment Unit
ISP-040102	Information security awareness	
	Awareness initiatives need to be conducted regularly as part of an annual program to remind employees about their obligations with respect to information security.	GIT Training and Recruitment Unit
ISP-040103 Compliant to ISP and Procedures		
	Every employee must understand and comply to Gamuda Group ISP. Failure to do so will be subjected to disciplinary action.	ALL, HR
ISP-040104	Security in job responsibilities	
	Every employee shall be responsible to preserve the confidentiality, integrity and availability of Gamuda Group information asset and data.	HOD, HR
Objective: H	uman Resources Matter	
Description	Description To ensure the personnel are aware of information security threats and concerns and are equipped to support organizational security Policy in the course of the normal work.	
ISP-040201	ISP-040201 Disciplinary action for Information Security Policy non-compliance	
	Non-compliance with ISP, standards, or procedures is grounds for domestic enquiries that can result in disciplinary actions up to termination of employment and legal actions.	ALL, HR



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ISP-040202	Employee screening	
	Basic verification checks on all newly recruited employees must be carried out at the time of successful employment with Gamuda Group.	HR
ISP-040203	Action in response to employee termination	
	In the event that Gamuda Group employee is terminating his or her relationship with Gamuda Group, the HOD must inform the HR immediately.	HOD, HR, Business Unit
ISP-040204	Compliance to ISP	
	All employees must adhere to the ISP at the time they join the company.	HR

	DOMAIN 05 - INFORMATION SECURITY RELATED TO PHYSICAL & ENVIRONMENTAL	
Objective: B	uilding Access Control	
Description	To prevent unauthorized access, damage and interference premises and information.	ence to business
ISP-050101	Physical access control for secured areas	
	Access to Data Centre, Command Centre, Security Operation and areas containing information labelled as Confidential or critical infrastructure must be physically restricted.	ALL, HR, GIT
	Only the facility owner authorized to grant physical access to these premises. Record of granted access shall be retained by respective department.	
	Access to restricted areas within Gamuda Group premise during off-office hours, weekends, and public holidays shall be controlled.	
	All access shall adhere to the zoning system identified.	
	All entrance the centre must be installed with door access system. Locations with 24 hours man surveillance are exempted with door card access. Access from emergency exit to computer facilities in the centre from outside must be prevented.	



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Each person shall present his/her Gamuda Group issued identification card, or be constantly accompanied by as staff member, before entering every controlled door or area within Gamuda Group premises. The party who authorized the access shall maintain the physical access log. Access logs that shall be maintained are: 1. Access card system 2. Third party access to Confidential information area and critical infrastructure area 3. CCTV logs Admin department will initiate review of physical access log records with respective information asset owners. ISP-050103 Reporting lost or stolen Identification Badges The return notice and instruction must be made visible on all identification badges. Identification badges that are lost or stolen must be reported immediately by the employee to the appropriate party who issues the card (i.e. HR). The Project Owner concern share the responsibility on the lost of identification badge by employee or third party. Objective: Building Access Control Description To prevent unauthorized access, damage and interference to business premises and information. ISP-050201 Working in secured areas While working in secured areas, the following controls should be observed to enhance the security of a secured area: 1. Unmanned secured areas must be physically secured and periodically checked. 2. Third party support services personnel is granted restricted access to secured areas	ISP-050102	Physical access control log	
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should be observed to enhance the security of a secured area: 1. Unmanned secured areas must be physically secured and periodically checked. 2. Third party support services personnel is	ISP-050201	Working in secured areas	
secured and periodically checked. 2. Third party support services personnel is		should be observed to enhance the security of a	ADMIN
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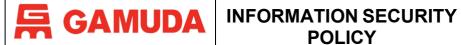
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ISP-050202	only when required. This access must be authorized and monitored. Drone, photographic, video, audio or other recording equipment shall not be allowed to be used, unless authorized by the facility owner. Working in secured areas after official business here.	Group Corporate Communication.
	If access to Gamuda Group facility has been restricted because sensitive, critical, or valuable information is handled therein, working in secured areas by employee or third parties after normal working hours is only permissible upon authorization from facility owner.	ALL,GIT
ISP-050203	Unobtrusive site (for secured areas)	
	Buildings or rooms that are designated as secure areas should be unobtrusive and give minimum indication of their purpose, with no obvious signs, outside the area identifying the presence of information processing activities.	INFRA, EUSS, ITAM
ISP-050204	Isolated delivery and loading areas (for secured ar	reas)
	Delivery and loading areas should be controlled and isolated from secured areas to avoid unauthorized access. Third parties need to register at the Security Guard and load the items at the designated areas and have them delivered to relevant parties with proper sign-off.	GIT, ADMIN
Objective: H	andling Visitors	
Description	Description To prevent compromise or theft of information and information processing facilities.	
ISP-050301	Identification and sign-in process required for all	visitors
	All visitors accessing the secured areas must be logged. Visitors must be admitted to Gamuda Group premises only for specific authorized purposes.	ALL



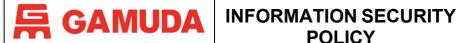
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ISP-050302	Supervised third party access	
	Visitors (e.g. customers, contractors) must be escorted to secure areas by Gamuda Group employee.	GIT
ISP-050303	Individuals seen without identification badges mu	st be questioned
	Individuals seen by Gamuda Group staff without a proper Gamuda Group identification badge (or badge that is not put on a visible place) must be immediately questioned. If the visitor cannot promptly produce a valid badge, they must be escorted to the Security or receptionist.	ALL
Objective: H	ardware, Peripheral and Other Equipment Security	
Description	To have better guidance in handling physical equipment	nt.
ISP-050401	Preparing premises to site information processing	equipment
	The sites chosen to locate information processing equipment and to store data must be suitably protected from physical intrusion, theft, fire, flood and other hazards. All production servers servicing customers must be housed in the Data Centre.	INFRA
ISP-050402	Fire, water and physical intrusion alarm trigger im	mediate action
	Gamuda Group Data Centre & Disaster Recovery Site must be equipped with fire and physical intrusion alarm system that automatically alert those who can take immediate action. Installation of fire detection system, if any, must comply with local regulations. Fire detection system must be checked to ensure that these have been suitably installed, and must be regularly checked and serviced, at least on an annual basis. Smoking, eating and drinking must be strictly prohibited in the Data Centre.	GIT



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	Equipment, paper and flammable materials not essential to the operations must NOT be stored in the Data Centre.	
ISP-050403	Power supplies	
	To ensure the continuity of services, all critical equipment in Gamuda Group offices must use surge suppressors. Core systems must be connected to UPS's and a generator set.	GIT, ADMIN
ISP-050404	Security equipment off-premises	
	Any use of equipment for information processing outside Gamuda Group premises must require authorization by the facility owner.	INFRA
	Log of equipment movement and usage shall be maintained.	
ISP-050405	Disposal and reuse of IT equipment	
	Confidential information must be erased, where applicable from equipment or overwritten (reformat) prior to disposal or re-use. The authorization to dispose equipment must be obtained from IT Asset Management.	ITAM, EUSS
	All equipment that have been classified as beyond repair that can no longer be used or have been replaced with new equipment should be sent back to GIT for disposal and write-off. The respective department should only prepare the transfer of the equipment to GIT for onwards write-off or disposal. The equipment should not be retained by the users as further use of the equipment constitutes an illegal use of software.	
ISP-050406	Clear desk and screen	
	A clean desk and screen can be an important tool to ensure that all confidential and sensitive materials are removed from user workspace and locked away when the items are not in use or user leaves his/her workstation. It is one the strategies in reducing the risk of security breaches in the workplace. This can also increase user's awareness about protection of sensitive information.	ALL



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	Users are required to ensure that all confidential and sensitive information in hardcopy or electronic form is secure in their work area at the end of the day and whenever they are away from their work area.	
	 Computer workstations must be locked when workspace is unoccupied. 	
	 Computer workstations must be shut completely down at the end of the work day. 	
	 File cabinets containing confidential and sensitive type of information must be kept closed and locked when not in use or when not attended. 	
	 Keys used for access to confidential and sensitive type of information must not be left at an unattended desk and cabinets. 	
	 Notebook and mobile devices must be either locked with a locking cable or locked away in a drawer. 	
	 Passwords may not be left on sticky notes posted on or under a computer, not may they be left written down in an accessible location. 	
	 Printouts containing confidential and sensitive type of information should be immediately removed from the printer. 	
	 Upon disposal confidential and sensitive type of documents should be shredded in the official shredder bins or placed in the lock confidential disposal bins. 	
	 Whiteboards containing confidential and sensitive information should be erased. 	
	 Treat mass storage devices such as CDROM, DVD, USB drives and External Hard Disk as sensitive and secure them in a locked drawer. 	
ISP-050407	Removal of property	
	Equipment, information or software belonging to Gamuda Group must not be removed (i.e. transferred, deleted) without authorization of the IT Asset Management.	ITAM



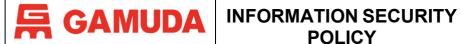
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ISP-050408	Loss of equipment	
	Every user is responsible and accountable for the desktop computer, notebook, accessories and licences that have been assigned to them. Users are to ensure against any tempering, missing, stolen or loss of equipment. Users are to make police report for any loss items and report to IT Asset Management for record purposes. Insurance section should be immediately informed for insurance claims (if any).	ITAM, Megah Management Services (insurance), HR
ISP-050409	Cabling security	
	Network cabling must be protected from unauthorized interception or damage. The cables within the data centers must be labeled accordingly.	GIT
ISP-050410	Equipment maintenance at Data Centre	
	Electrical system and distribution box within the Data Centre is checked at least annually. All equipment housed in the Data Centre that belongs to Gamuda Group.	GIT
ISP-050411	Faulty IT Equipment	
	Equipment under GIT Ownership which needs to be repaired will be sent to the appropriate vendors for repair. GIT or the vendor shall provide a replacement unit — subject to availability of spare unit. Only authorised GIT staff shall liaise with the vendor for repair. GIT will maintain a log of all GIT equipment sent for repair and will follow-up very closely with the vendor to minimise any delay in repair.	ITAM, EUSS, INFRA
	Only GIT shall determine whether faulty equipment is beyond repair. Users will be advised if the equipment cannot be repaired and to request for new equipment as replacement. For equipment that is faulty due to user carelessness or negligence, the cost of repair may be charged back to the user unless the user can prove otherwise.	
ISP-050412	The use of Desktop Computer	
	Desktop computers are provided exclusively for the use by staff in accordance with their normal duties of employment. All other use is private. Private use is allowed, as a privilege and not a	ALL



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right, but if abused will be treated as a breach of the employment regulations. The devices, software & hardware accessories, components, and programs, which belong to the company shall be preserved and protected at all time. Only authorised workstations can access to Gamuda Group network, company information and business applications. It is not permitted to download any software applications, programs, executable files by any users. Only authorised IT technical support staff can perform the necessary download. Software on PCs will also be regularly reviewed as part of PC maintenance and replacement. Users shall be fully responsible and accountable for the materials, contents, outputs and files on the computer devices as well as the integrity of data stored on the devices and its accessories. All official data related to the business of the company should be stored in the shared location accessible to the respective group as setup by GIT. Users will be held personally responsible for any problems caused by their negligence. ISP-050413 The use of Notebook & Mobile Devices Notebook and mobile devices are provided ALL exclusively for the use by staff in accordance with their normal duties of employment. All notebooks, mobile devices and its accessories are the property of Gamuda Group and are provided to staff for a period of time as deemed appropriate. Only authorised workstation/devices by GIT can access to Gamuda network, company information and business applications. Users must NOT install software or hardware or change the system configuration including network settings without prior consultation with GIT.



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•	Users must protect company's workstation and devices from damage and theft. Safety and security of workstations and devices shall be given utmost importance. Users will be held personally responsible for any problems accord by their pedigenes.	
•	It is not permitted to download any software applications, programs, executable files by any users. Only authorised GIT technical support staff can perform the necessary download.	
•	Workstations and devices must not be loaned to any authorised personnel, friends, family members etc.	
•	Users shall be responsible to the intellectual property rights and ensure the use of licensed software only.	
•	Users shall not make changes or do anything on the workstations and devices or its accessories such that it may adversely affect the performance of the device or make it exposed to viruses.	
Tł	ne use of Printer	
i)	Print only those documents, which are relevant to the work, and related to the company. Excessive printing of personal documents is prohibited.	ALL, ITAM
i) ii)	the work, and related to the company. Excessive printing of personal documents is prohibited.	ALL, ITAM
ii)	the work, and related to the company. Excessive printing of personal documents is prohibited. Standalone printers shall only be installed for those with specific business need as determined	ALL, ITAM
ii) iii)	the work, and related to the company. Excessive printing of personal documents is prohibited. Standalone printers shall only be installed for those with specific business need as determined by GIT.	ALL, ITAM
	•	 devices from damage and theft. Safety and security of workstations and devices shall be given utmost importance. Users will be held personally responsible for any problems caused by their negligence. It is not permitted to download any software applications, programs, executable files by any users. Only authorised GIT technical support staff can perform the necessary download. Workstations and devices must not be loaned to any authorised personnel, friends, family members etc. Users shall be responsible to the intellectual property rights and ensure the use of licensed software only. Users shall not make changes or do anything on the workstations and devices or its accessories such that it may adversely affect the performance



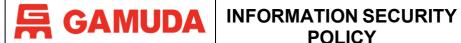
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DOMAIN 06 - INFORMATION SECURITY OPERATIONS MANAGEMENT & IT NETWORK		
Objective: O	perational Procedures and Responsibilities	
Description	To ensure the correct and secure operation of information processing facilities.	
ISP-060101	Formal change control procedure required for all liv	e systems
	All computer and communications systems used for live processing at Gamuda Group shall employ a formal change control.	GIT
	For situation that involves change due to regulatory requirement, management directive, business process that affecting the information flow and service, the change management process should follow departmental change management process.	
ISP-060102	Change Management review/approval	
	The change requestor must submit the request to be reviewed/approved by relevant HOD in the Service desk system.	ALL, GIT
ISP-060103	Post-Change Management implementation review	
	As part of the overall performance management and validation process, a review shall be warranted. The review for major changes is performed within 6 months after completion.	GIT
ISP-060104	Segregation of duty	
	It is at the responsibility of HOD to ensure segregation of duty subject to the sensitivity of the duties. Sensitive duties must be segregated to avoid collusion. Else, other controls such as monitoring of activities, audit trails and management supervision shall be considered.	ALL,GIT,HR
	Logical access controls must be used to enforce segregation of duties between incompatible functions.	
ISP-060105	Documented operational procedures	
	All operating procedures must be documented and maintained, with changes being authorized by the HOD	HOD, ITGC



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	or another authorized party and deposited in the designated repository.			
Objective: In	Objective: Information System Planning and Acceptance			
Description	Description To minimize the risk of system failures.			
ISP-060201	Information processing capacity planning			
	Capacity demands shall be monitored, and projections of future capacity requirements made to ensure that adequate processing power and storage are available. Asset Owner should work closely with GIT to determine the capacity requirements.	INFRA, ITAM		
ISP-060202	System acceptance			
	Acceptance criteria for new information system, upgrades and new versions shall be established and suitable test of the system carried out prior to acceptance.	ALL, GIT		
Objective: P	rotection Against Malicious and Mobile Code			
Description	To protect the integrity of software and information from damage by malicious software.			
ISP-060301	Installing and maintaining of Endpoint Detection an	d Response (EDR)		
	GIT will provide centralized security and continuously monitor threat of all end points of the network, delivering a comprehensive and holistic protection.	GIT		
ISP-060302	User responsibility in mitigating computer virus			
	i) Security is every user's responsibility. Hence users are expected to be aware of the security threats like virus attacks, hacking, trojan horses, worms, zombies, spoofing, phishing, spyware, adware etc. that may impact their valuable data stored in their respective workstation.	All		
	ii) If the workstation or devices is suspected to be infected with virus, a message is received stating that a virus has been located in the workstation or devices, immediately send to GIT.			



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	iii) Most viruses arrive by email and many are spread by subscriptions to mailing lists. Therefore, only subscribe to work related mailing lists.		
	iv) It is illegal to use the network services or equipment to develop or distribute any form of virus, trojan or any other form of malicious code.		
	v) It is illegal to use the network services or equipment to attempt to hack or gain unauthorized access to any computer system.		
	vi) Check out any suspicious or unexpected emails with the GIT team before opening them.		
ISP-060303	Usage authorization of software		
	All usage of software should be in compliance with software license and authorized by GIT.	ALL, GIT	
ISP-060304	Installation of Non-Standard Software and Hardware		
	IT Asset Management will approve all non-standard software and hardware.	ITAM, EUSS, INFRA	
ISP-060305	ISP-060305 Obtaining files and software		
	Employees are prohibited to download any files and software from unknown sources (either from external network or any other medium) unless it has been scanned for malicious software before use.	ALL	
Objective: H	ousekeeping		
Description	Description To maintain the integrity and availability of information processing and communication services.		
ISP-060401	Data Storage		
	 All data residing on the company issued workstation or devices are the property of Gamuda Group. 	ALL, GIT	
	 Sensitive and mission critical data should NOT be stored on local devices. 		
	 Data stored on the local device of workstation or devices is the sole responsibility of the user. 		
	 Users are responsible for the safety, integrity, backup and recovery of any data stored on local drives of their workstation or devices. 		



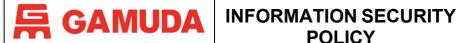
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	 GIT is NOT responsible for backing up/restoring of data kept on the local drive. 	
	All official data should be stored in the shared location accessible to the respective group as per business requirement so that data availability and integrity is maintained. Avoid keeping any personal data in shared location.	
ISP-060402	Information back-up	
	Back-up copies of essential business information and software for critical systems shall be taken regularly. The backup processes must be performed at least weekly or at a suitable frequency defined.	GIT
ISP-060403	Off-site storage of back-up media	
	All critical information/software recorded on back-up computer media must be stored in a different building.	GIT
ISP-060404	Cloud Storage (Online Data Storage)	
	GIT has provided the facility of One Drive as Gamuda Group cloud storage. As such, users are encouraged to utilise this facility as an online data storage and for sharing information.	ALL, GIT
ISP-060405	Minimum information retention period	
	Minimum information retention period is subject to criticality of data.	GIT
	Financial record shall be retain for 7 years while others must be kept for minimum 3 years or stipulated by regulation.	
ISP-060406	Logs required on application system handling sens	itive information
	Business application systems or tasks, which handle sensitive information (Confidential), must be able to generate transactional logs that show every addition, modification and deletion to such sensitive information.	SAP
ISP-060407	Retention period of logs	
	All critical application and system logs must be retained for future reference. As a minimum all logs must be kept for 12 months.	GIT



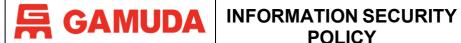
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ISP-060408	Logs Access Control		
	All system and application logs must be maintained in a form that cannot readily be viewed by unauthorized persons. The GIT is the division responsible in defining the log access control and the owner of the information; while GIT is the custodian.	GIT	
ISP-060409	Amendments to System File		
	All amendments to system files must only be made by GIT personnel. Users are prohibited to make any system file changes.	GIT	
ISP-060410	Back-up Responsibility		
	Infra personnel are responsible to ensure that the back up is executed and adequate.	INFRA	
ISP-060411	ISP-060411 Preservation of Cloud Service Security		
	When Gamuda Group should only acquire service from established service provide.	GIT	
Objective: M	ledia Handling and Security		
Description	To prevent damage to assets and interruptions to busine should be controlled and physically protected.	ess activities, media	
ISP-060501	Security of system documentation		
	System documentation (i.e. operating manual, user manual, maintenance manual, etc.) must be stored securely and the access for the document should be kept to a minimum.	GIT	
ISP-060502 Handling of removable media			
	The use of removal media shall be controlled within Gamuda Group. Removable media drives should only be enabled if there is a business reason for doing so.	GIT	
ISP-060503 Portable Memory & External Hard Drive			
	 External hard drives and portable memory MUST NOT be used for long-term storage of Gamuda Group business data. 	ALL	
	 External hard drives and portable memory devices are for temporary data storage only and may be used only to transfer/transport business data. Data 		



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	MUST be deleted after transfer/transport business data.	
	■ The use of external hard drive is allowed for the purpose of data backup if there is no other data backup facility available.	
	 Users using portable storage devices, and flash memory and external hard drive MUST ensure that such devices are free from virus and malware prior to use. 	
	 Users must take every precaution to ensure the privacy of information on such devices. 	
Objective: M	ledia Handling and Security	
Description	To prevent damage to assets and interruptions to busine should be controlled and physically protected.	ess activities, media
ISP-060601	Information exchange agreements	
	Agreements should be established for the exchange of information (whether electronic or manual) between organizations based on the sensitivity of the business information involved.	ALL
ISP-060602	Security of media in transit	
	All sensitive media in transit (e.g. via postal or courier) should be suitably protected.	ALL
ISP-060603	Online Data security	
	Where data or information is involved via online, Gamuda Group shall take security into considerations upon advice from GIT. Information involved in on-line transaction must be protected to prevent unauthorized disclosure.	ALL
Objective: Electronic Mail & Electronic Office System Security		
Description	To ensure the safeguarding of information in electronic and the protection of the supporting infrastructure.	
ISP-060701	General use and ownership of email and office system	
	While Gamuda Group desires to provide a reasonable level of privacy, users should be aware that the data they create on the corporate systems remains the	ALL



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	property of Gamuda Group. Because of the need to protect Gamuda Group network, management cannot guarantee the confidentiality of information stored on any network device belonging to Gamuda Group. For security and network maintenance purposes, authorized individuals within GIT may monitor equipment, systems and network traffic at any time. Gamuda Group reserves the right to audit networks and systems on a periodic basis to ensure compliance with	
ISP-060702	this policy. Email Authorized Use	
	Data Protection	ALL
	Email messages are confidential to an individual. All emails will be monitored by GIT.	
	Distribution	
	Except for company related information that requires internal circulation, users should refrain from sending or forwarding emails such as greetings to a large group of people as this takes up a lot of resources.	
	Attachment	
	Attachments must be sent with care. Large attachment must only be sent to those who really require them. The email system commonly duplicates the attachment as many times as the number of recipients of the message. This takes a lot of disk space, thus impacting on performance and delivery of other messages. GIT encourage the use of One Drive facility in order to share documents instead of sending attachments.	
ISP-060703	Internet Authorized Use	
	Use of Internet	ALL
	Gamuda Group recognises that the internet is an integral part of doing business and therefore encourages staff to use the internet whenever such use supports the company's goals and objectives.	



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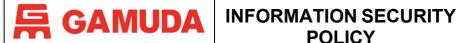
	Gamuda Group also recognises that the internet is embedded in people's daily lives. As such, staff are allowed to use the internet for personal reasons at the company's discretion and in compliance with ISP.		
ISP-060704	ISP-060704 No Default protection		
	Gamuda Group electronic mail system is not encrypted by default. Employee is not allowed to send confidential information unless it has been first encrypted or properly protected.	ALL	
ISP-060705	Scanning of attachments		
	Employees need to ensure that attachments are scanned prior to download/open.	ALL	
	Employees must use extreme caution when opening email attachments received from unknown senders, which may contain viruses, e-mail bombs, or Trojan horse code.		
ISP-060706 Message disclaimer			
	A disclaimer encouraged be placed on all email messages.	ALL	
ISP-060707	Social Media		
	Social media broadly include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletter, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner. All Gamuda employees shall adhere to Gamuda Social Media Policy by Group Corporate Communication.	ALL, GCC	
Objective: E	lectronic Mail & Electronic Office System Security		
Description	To ensure the safeguarding of information in electronic at the supporting infrastructure.	and the protection of	
ISP-060801	Audit Logging for System Logs		
	Audit logs produced must record user activities, exceptions and information security events. The logs must be kept for a minimum 1 years to assist in future investigations and access control management.	GIT	



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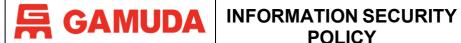
ISP-060802	Monitoring System Use	
	Reporting for use of information processing facilities must be established. The results of the monitoring activities are to be reviewed and reported based on incident(s).	GIT
ISP-060803	Protection of Log Information	
	Logging facilities and log information should be protected against tampering and unauthorized access. If the logs reside on internet-accessible computers, which are not directly Internet-accessible.	GIT
ISP-060804	Administrator and Operator Logs	
	System administrator and system operator activities must be logged. These logs must be reviewed on a regular basis by Infra and SAP Basis Team.	INFRA
ISP-060805	Fault Logging	
	Faults reported by users or system programs related to problems with information processing or communications system shall be logged and analysed by EUSS. Appropriate actions must be taken.	EUSS, Cybersecurity, Infra
ISP-060806	Clock synchronization for accurate logging of event	s on network
	All critical servers connected to Gamuda Group internal network shall always have the current time accurately reflected in their internal clock referenced to a recognized time-source.	INFRA

DOMAIN 07 - INFORMATION SYSTEMS ACCESS CONTROL			
Objective: B	Objective: Business Requirement for Access Control		
Description	To control access to information.		
ISP-070101	ISP-070101 When to use computer system access control		
	All computer-resident information that is (confidential and above) sensitive, critical, or valuable must have system access controls to ensure that it is not improperly disclosed, modified, deleted or rendered unavailable.	ALL	



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ISP-070102	Disclaimer of responsibilities for damage to data an	d programs
	Gamuda Group uses access controls and other security measures to protect the confidentiality, integrity and availability of the information handled by computers and communications system. In keeping with these objectives, management maintains the authority to:	ALL
	 Restrict or revoke any user's privileges, 	
	Inspect, copy, remove, or otherwise alter any data, program, or other system resource that may undermine these objectives, and	
	Take any other steps deemed necessary to manage and protect its information system.	
	This authority may be exercised with or without notice to the involved users. Gamuda Group disclaims any responsibility for loss or damage to data or software that results from its efforts to meet these security objectives.	
Objective: U	Objective: User Access Management	
Description	To ensure that access rights to information system are a authorized, allocated and maintained.	ppropriately
ISP-070201	Allocation of privileges	
	The privileges associated with each business application system, (e.g. operating system, database management system and each application) and the categories of employee to which they need to be allocated should be identified and authorized by the Asset Owner and implemented by GIT.	Asset Owner, GIT
	Creation, amendment and maintenance of user and resource profiles can only be executed by GIT with written authorization from the Business Unit, which must be retained for validation. When authorizing access, the Asset Owner should consider the following.	
	Compatibility with other responsibilities and existing access rights of the user.	
	2. The classification of the information.	



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	 Whether the requested level of access is required in order to allow the user to carry out his/her normal duties. 	
	 Duration that access required, if access is needed on a temporary basis. 	
ISP-070202	Privilege restriction based on the need-to-know	
	The computer and communications system privileges of all users, systems and programs must be restricted based on the need-to-know, i.e. the minimum requirement for their functional role only when needed.	GIT
ISP-070203	Periodic review and reauthorization of user access	privileges
	The system privileges granted to every user must be re-evaluated by the Business Unit and GIT at least annually for critical systems. This re-evaluation involves a determination whether currently enabled system privileges are still needed to perform the user's current job duties.	Business Unit, GIT
SP-070204	Information system access privilege terminated when	n employee leaves
	All Gamuda Group information system privileges must be promptly terminated or suspended at the time that employee ceases to provide services to Gamuda Group.	Business Unit, HR, GIT
	ID's are also revoked if:	
	Misconduct of user that may interfere with normal and proper operations, or	
	Disturb others' use of information system	
	Note: Controlled ID's such as root, administrator are exceptions to this requirement and follow other control procedures.	
ISP-070205	Granting of user-ID and access rights to outsiders	
	Individuals who are not employees must NOT be granted a user-ID or otherwise be given privileges to use Gamuda Group computers or communications system unless approval from the Business Unit and GIT has first been obtained.	Business Unit, GIT, Cybersecurity
	Before any third party is given access to Gamuda Group system and information, a formal agreement defining the terms and conditions of such access must	



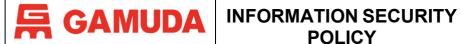
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	have been signed by an authorized representative at the third-party organization.		
Objective: Network Access Control			
Description	Protection of networked services.		
ISP-070401	401 Internal network addresses must not be publicly release		
	The internal system addresses, configurations and related system design information for Gamuda Group networked computer system must be restricted such that both system and users outside Gamuda Group internal network cannot access this information.	GIT	
ISP-070402	Large network must be divided into separate domai	n	
	All large networks crossing Gamuda Group boundaries must have separately defined logical domains, each protected with suitable security perimeters and access control mechanisms.	GIT	
ISP-070403	ISP-070403 Internet connected machines must have an intrusion detection system		
	To allow Gamuda Group to promptly respond to attacks, all Internet-connected devices must be protected by suitable technological platform	GIT	
ISP-070404	ISP-070404 Live servers, staging servers and external network connections require firewalls		
	All in-bound external connections to Gamuda Group internal networks or multi-user computer system must pass through an additional access control point (i.e. firewall) before users can reach a login banner.	GIT	
ISP-070405	Firewalls must run on dedicated system		
	All firewalls used to protect Gamuda Group internal network must run on separate dedicated system. These computers may not serve other purposes such as acting as web servers etc.	GIT	
ISP-070406	Firewall configuration change requires information	security approval	
	Firewall configuration rules and permissible service rules shall not be changed without proper authorization.	GIT	



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ISP-070407	Direct network connection with outside organizations	
	The establishment of a direct connection between Gamuda Group system and computers at external organizations, via the Internet or any other public network, is prohibited unless this connection has first been approved by GIT. The network connections should be secured using a secure tunnelling.	GIT
ISP-070408	Security requirements for network-connected third-	party system
	As a condition of gaining access to Gamuda Group computer network, every third party must secure its own connected system in a manner consistent with Gamuda Group requirements. It is advised that third parties get security assessments performed on their system before connecting to the system within Gamuda Group.	GIT
	Gamuda Group reserves the right to audit the security measures in effect on these connected system without prior warning. Gamuda Group also reserves the right to immediately terminate network connections with all third party system not meeting such requirements.	
ISP-070409	Remote diagnostic port protection	
	Access to diagnostic port should be securely controlled. The system administrator for a particular application system needs to work together with GIT (Network) to define ports that need to be opened.	GIT
ISP-070410	User authentication for external connections	
	Access by remote users to Gamuda Group network should be subject to authentication except those designated publicly accessible servers, e.g. public web servers, etc. Approval GIT is needed prior to authorizing remote access.	GIT
ISP-070411	Wireless Policy	
	GIT shall establish and ensure the appropriate protection of Gamuda Group data communication over wireless forms of transmission and reception.	GIT



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ISP-070412	Allowable Wireless Devices	
	All wireless devices connected to Gamuda Group enterprise network must be certified by a certification agency prior to installation and use for processing business information. Where permissible, wireless devices encouraged be registered with GIT for inventory and audit purposes.	GIT
ISP-070413	Deployment of Wireless Communications Devices	
	Wireless deployments should conform to existing Gamuda Group administrative and operational procedures.	GIT
	Wireless network deployment should comply with overall organization network architecture and security requirements. Wireless devices are placed in separate network and intrusion detection system is used to monitor the network traffic.	
	Wireless network deployment should take into account physical security issues surrounding wireless enabled workstations and system, location of wireless access points and access control to physical media, system and facilities. This control represents practices and procedures to protect physical devices from unauthorized access or exploitation.	
	Default wireless setting must be changed prior to deployment and it should not contain any identifying information about the organization information or vendor product identifier. Passwords required to access wireless devices console should comply with organization password policies.	
	GIT should ensure that anti-virus software is installed and configured in accordance with the company personal computer practice on all wireless connected devices, and kept up-to-date with most recent virus definition tables.	
ISP-070414	Access Control on Wireless Communications	
	Wireless access should implement user-based access control by requiring user to authenticate prior gaining access to the wireless network. This control may include authentication password at the wireless access-points. Each user is required to have an	GIT



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	assigned IP address before wireless access is provided.		
ISP-070415	ISP-070415 Encryption on Wireless Communications		
	To ensure the data confidentiality, authentication and integrity, wireless devices must use highest and recommended encryption available. All implementations must support hardware address that can be registered, tracked and firmware updated. Existing hardware that does not support current security standard and features should be upgraded and/or replaced.	GIT	
Objective: O	perating System Access Control		
Description	To prevent unauthorized computer access.		
ISP-070501	Before log-on		
	It is encouraged to have a general notice warning that the computer should only be accessed by authorized users should be displayed on critical system.	GIT	
ISP-070502	ISP-070502 Limit on consecutive unsuccessful attempts to log-on		
	To prevent password guessing attacks, the number of consecutive attempts to enter an incorrect password must be strictly limited.	GIT	
ISP-070503	Upon successful log-on		
	On completion of a successful log-on, the following information should be displayed to critical system: 1. Date and time of the previous successful log-on, or 2. Details of any unsuccessful log-on attempts since the last successful log-on (log).	GIT	
ISP-070504	Unique user-ID and password required		
	All users (including technical support employee, operators, network administrators, etc) must have a unique identifier (user-ID) and password for their personal and sole use so that activities can subsequently be traced to the responsible individual.	ALL	



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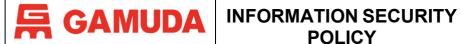
	Please note the user-ID and password must be unique per user, not necessarily per system.	
ISP-070505	Access to Users' Desktop and Notebook	
	IT technical personnel shall have the right to access users' desktop computer and notebook (with prior notice) during non-office hours or via remote connect for troubleshooting, maintenance and software installation purposes.	GIT
ISP-070506	Multiple Sessions	
	The simultaneous log-on at two (2) or more terminals, system or application using the same user-ID is only allowed for identified system.	GIT
ISP-070507	Minimum password length	
	The minimum password length is to follow the User Access Management Procedure.	ALL
ISP-070508	Quality password	
	The quality of password is to follow the User Access Management Procedure.	ALL
ISP-070509	Periodic password change	
	The periodic password change is to follow the User Access Management procedure	GIT
ISP-070510	Removal of unnecessary system software at installa	ation time
	All system software which will definitively not be used at the present time and which comes along with the operating system or other system software should be removed from production system at the time when the operating system or other system software is installed.	GIT
ISP-070511	Desktop Computer Upgrade	
	Desktop computer upgrade happens when an existing desktop computer is replaced with a new desktop computer but without having to purchase new software license. All applicable licenses will be transferred from old desktop computer to the new desktop computer. As such, upon desktop computer upgrade, the old desktop computer can no longer be used as it no longer has a valid software license. The old desktop computer needs to be returned to IT as soon as the new desktop	GIT



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ISP-070702	Mobile device used for corporate business informat To refer to IT Asset Management Procedure.	ion ITAM	
	To refer to Remote Working Procedure.	HR	
ISP-070701	Telecommuting privileges		
Description	Description To ensure information security when using mobile computing and teleworking facilities.		
Objective: M	Objective: Mobile Computing & Telecommuting		
	All Gamuda Group staff user-ID / passwords privileges for live Gamuda Group business application system must be created and managed centrally through the GIT.	GIT	
ISP-070602 Limit on consecutive unsuccessful attempts to log-on			
	Users of applications system should be provided with access to information and application system functions in accordance with a defined access control procedure.	GIT	
ISP-070601	Before log-on		
Description	To prevent unauthorized access to information held in in	formation system.	
Objective: A	Objective: Application Access Control		
	computer is delivered to avoid any breach of illegal software usage.		

DOMAIN 08 - INFORMATION SYSTEM ACQUISITION, DEVELOPMENT AND MAINTENANCE			
Objective: S	Objective: Security in Application System		
Description	Description To ensure that IT projects and support activities are conducted in a secure manner.		
ISP-080101	Security requirements analysis and specification		
	All Project Owner must take security into consideration during the design stage of the application system (for both in-house and outsourced software development). GIT should be consulted on security. All software development efforts are to follow proven system	Project Owner, GIT	



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	development life cycle, where security measures are defined at every stage of the entire process.		
	Risks must be analysed and countermeasures must be introduced.		
ISP-080102	Correct processing of applications		
	Appropriate controls and audit trails should be designed into application system. These should include the validation of input data, validation of output data, internal processing, authenticity and integrity of messages, etc.	Business Unit, Project Owner, GIT	
Objective: C	ryptographic Control		
Description	To protect the confidentiality, authenticity or integrity of i	nformation.	
ISP-080201	Protection of encryption key		
	Encryption is used for confidential and proprietary information and is defined as sensitive and/or critical and that is stored in non-secure locations or transmitted over open networks such as the Internet.	GIT	
	The GIT are responsible for developing procedures for key management usage and for facilitating user training.		
	Encryption keys should be protected with the most stringent security measures and must not be revealed to others.		
	Any potential compromise of a secret key must be reported immediately to GIT.		
ISP-080202	ISP-080202 Key Management		
	All keys must be protected against modification, destruction, or unauthorized disclosure throughout the entire lifecycle of the key.	GIT	
	To assure interoperability and consistency across the enterprise.		
	The encryption standards ensure secure generation, storage, and transmission of keys as well as ensuring interoperability and key recovery (i.e. Management must be able to retrieve encryption-keys used for encrypted company information in storage)		



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Objective: S	ecurity of System Files		
Description	To ensure that IT projects and support activities are conducted in a secure manner.		
ISP-080301	SP-080301 Updating of live business application software libraries and components		
	The updating of the operational program libraries should only be performed by the nominated administrator (custodian).	GIT	
ISP-080302	Live Gamuda Group business application system m source code	ust not store	
	Live business application system must not store source code.	System Administrator, GIT	
ISP-080303	Audit log maintained for program update		
	An audit log should be maintained for all updates to operational program libraries. Audit logs should be archived for One (1) years as minimum.	GIT	
ISP-080304	080304 Previous versions of software retained		
	Previous versions of software (one version behind UAT) should be retained as a contingency measure.	GIT	
ISP-080305	Access control in test environment		
	The access control procedures, which apply to operational application system, should also apply to test application system.	GIT	
	Test data, applications, and system must be protected accordingly from un-authorized access and modifications.		
ISP-080306	ISP-080306 Deletion of information in test environment		
	Operational (production) information should be erased from a test application system immediately after the testing is completed.	GIT	
ISP-080307	Technical review of operating system changes		
	GIT should be sensitive to changes on operating system and install a newly supplied software release or patches. Patches or software release shall be validated prior to apply to live environment.	GIT, ALL	



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	OS update happens in regular frequencies. Users must not stop the OS update process while it runs in the machine.	
ISP-080308	Restriction on changes to software packages	
	Modifications to software packages must be strictly controlled and be approved by the management team. Changes must be fully tested and documented by GIT and approved by various parties involved prior to release.	GIT

DOMAIN 09	- INFORMATION SECURITY INCIDENT MANAGEMENT		
Objective: Reporting Information Security Events and Weaknesses			
Description	To ensure information security events and weaknesses associated with information system are communicated in a manner allowing timely corrective action to be taken.		
ISP-090101	Reporting security events, malfunctions and weakness	esses	
	All security incidents (either real or suspected), malfunctions and weaknesses shall be reported as quickly as possible to the relevant parties. Incidents that may jeopardize the preservation of information confidentiality, integrity and availability shall be forwarded to the EUSS.	ALL, GIT	
ISP-090102	External reporting of security violations		
	Information security violations that is notified to GIT will be reported to police.	GIT	
Objective: M	Objective: Management of Information Security Incidents and Improvements		
Description	n To ensure consistent and effective approach is applied to the management of information security incidents.		
ISP-090201 Collecting evidence of security violations			
	Evidence relating to a security incident must be properly collected and preserved for future investigation.	GIT	



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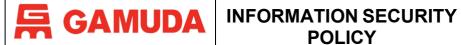
ISP-090202	Investigating information security incidents and malfunctions	
	All security incidents must be properly investigated and analyzed. GIT must respond accordingly to all incidents, liaising and coordinating with colleagues to both gather information and offer advice.	GIT
ISP-090203	Corrective and preventive activity	
	Counter measure shall be taken to recover from security incidents. Subsequently, corrective action must be taken to avoid the re-occurrence of the incident where appropriate.	GIT
ISP-090204	Lesson learned from information security incident	
	Where necessary, lesson learned from information security incident must be propagated to Gamuda Group employees to hinder similar instance from recurring and improvise delivery mechanism.	GIT, ITGC

DOMAIN 10 MANAGEME	- INFORMATION SECURITY RELATED TO BUSINESS ENT	CONTINUITY
Objective: B	usiness Continuity Management	
Description	To counteract interruptions to business activities and to business processes from the effects of major failures or	
ISP-100101	BCP Ownership	
	Responsibility for developing and implementing processes to assess and provide Business Recovery and Incident Response requirements in the event of a loss of IT facilities & all department services must be formally identified. Business Recovery Planning and Incident Response Planning reviews must be completed for all critical system and services, in the course of which, risks should be identified, evaluated and all reasonable measures taken to reduce or eliminate threats.	ITGC (HR to initiate).
ISP-100102	BCP Review and Maintenance	
	The BCP must be reviewed and maintained periodically in response to any changes affecting the basis of the original business impact analysis and security risk assessment. The review is to be carried out as and	HR to initiate



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	when required or every twelve (12) months, whichever is earlier.	
ISP-100103	Assessing the Security Risk	
	A risk assessment and business impact analysis is to be undertaken in order to determine the requirements of BCM.	HR to initiate
	Frequency of above is at least annually, or as needed (when there are changes to the current system which impacted the recovery time or method; or, when new system are introduced).	
ISP-100104	Training and Awareness Program on BCP	
	All employees must be made aware of the BCP and their respective roles. The BC Coordinators is responsible in coordinating the training and awareness program on BCP every 12 months.	HR to initiate
ISP-100105	Testing the IT BCP	
	The DRP is to be re-tested once a year (or after major changes, whichever is sooner) in order to ensure that the employees know how it is executed. Other components of BCP are to be tested annually or after major changes, whichever is sooner.	BC Coordinators, DR Coordinators
ISP-100106	Responsibility for BCM	
	Employees are expected to be present, and to assist to the best of their abilities, with the restoration of normal business activity after an emergency or a disaster disrupts Gamuda Group business activity. It is the responsibility of each business unit to work closely with the BC Coordinators to develop, maintain, review and test plans for business continuity in the event of loss of any mission-critical facility and to train staff in the use of these plans.	ALL
ISP-100107	Public Relations	
	Employees are expected to maintain their discretion with respect to the disaster in the initial stages and to treat information regarding the disaster as confidential. External communications such as to news media, the general public, clients, and public authorities is the responsibility of the Corporate Communications Department.	ALL, GCC



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ISP-100108	Storage and Distribution of BCM Documents	
	BCM documents with the complete procedures for response, recovery and resume must be readily accessible by BCM Committee and other teams that are involved in recovery and resumption processes.	HR to initiate
	The BCP should be stored in a secure place (like Documentation Room/Cabinet) within the Gamuda Group premise. Another copy is stored in secure offsite storage.	
	Each member of the BCM Committee and other teams that are involved in recovery and resumption processes, will also keep a copy of the relevant sections of the plan and it must be stored safely outside of the office e.g. in the car or another premise etc.	

	DOMAIN 11 - INFORMATION SECURITY RELATED TO LEGAL & CONTRACTUAL COMPLIANCE		
Objective: In	tellectual Property Rights		
Description	To avoid breaches of any criminal and civil law, statutory, regulatory or contractual obligations and of any security requirements.		
ISP-110101	Assignment of patent, copyright and other intellect	ual property rights	
	While serving for Gamuda Group, all employees grant Gamuda Group the exclusive rights to patents, copyrights, inventions, or other intellectual property they originate or develop for job related materials or tools.	ALL	
ISP-110102	ISP-110102 Property rights to computer programs and documentations		
	Without specific written exceptions, all programs and documentation generated by, or provided by employees, consultants, or contractors for the benefit of Gamuda Group are the property of Gamuda Group	ALL	
ISP-110103	ISP-110103 Legal ownership of information system files and messages		
	Gamuda Group has legal ownership of the contents of files stored on its computer and network system as well as all messages transmitted via these systems. Gamuda Group reserves the right to access this	ALL	



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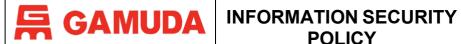
	information without prior notice whenever there is a genuine business need.	
ISP-110104	Attribution of sources for information	
	Gamuda Group employees should always give proper credit to the source of information used for Gamuda Group purposes.	ALL
ISP-110105	Relevant information security regulations, acts and	standards
	Relevant Information Security regulations, acts, and standards to be complied to are listed below. ITGC is responsible in determining the requirements that are relevant to Gamuda Group within the below-listed documents.	ITGC
	Personal Data Protection Act 2010	
	2. Computer Crime Act 1997	
	3. ISO/IEC 27001	
	4. Copyright Act 1987 (with Amendment in 1997)	
	 National Cyber Security Agency (NACSA), Majlis Keselamatan Negara. 	
Objective: P	rotection of Intellectual Property Rights	
Description	To ensure compliance of system with organizational sec standards.	urity policies and
ISP-110201	Copyrights notices on computer programs and docu	umentations
	All approved computer programs developed, owned by Gamuda Group and have been released and used in Gamuda Group' live business environment should include appropriate copyright notices.	ALL
	All approved manuals, guidelines and standards developed and owned by Gamuda Group should include appropriate copyright notices.	
ISP-110202	Periodic review of software/maintenance licensing a	greements
	The agreements for all computer programs licensed from third parties should be reviewed on a need basis, by ITAM.	ITAM
ISP-110203	Copying, transferring or disclosing of software prob	nibited
	Third party software in the possession of Gamuda Group must not be copied/transferred/disclosed unless	ALL



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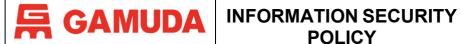
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	such activity is consistent with relevant license agreements and either: 1. Management has previously approved of such copying, or 2. Copies are being made for contingency planning purposes. Exporting software, technical information, encryption software or technology, in violation of international or regional export control laws, is illegal. The appropriate management should be consulted prior to export of any material that is in question.	
ISP-110204	Removal of unauthorized copyrighted information a	nd software
	Third party copyrighted information or software, that Gamuda Group does not have specific approval to store and/or use, must not be stored on Gamuda Group system or networks. System administrators will remove such information	ALL, SA
	and software unless authorization from the rightful owner(s) can be provided by the involved users.	
	Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books or other copyrighted sources, copyrighted music, and the installation of any copyrighted software for which Gamuda Group or the end user does not have an active license is strictly prohibited.	
ISP-110205	Adherence to Intellectual Property Rights	
	Gamuda Group strongly supports strict adherence to software vendors' license agreements and copyright holders' notices. Unauthorized copies of software are strictly forbidden by Gamuda Group. Likewise, Gamuda Group allows reproduction of copyrighted material only to the extent legally considered "fair use" or with the permission of either the author or publisher.	ALL
ISP-110206	Use of Gamuda Group Information for Non-Busines	s Purposes
	Gamuda Group information (product specifications, databases, mailing lists, internal software, computer documentation, etc.) may only be used for the business purposes specifically allowed by management. Use of these information resources for any other reason will be	ALL



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	permitted only after written permission has been granted by the designated owner of the information.	
ISP-110207	ISP-110207 Communication of Gamuda Group Confidential information	
	Unless expressly authorized by owner of the documentation/information, sending, transmitting, or otherwise disseminating confidential and/or secret data (including and in particular trade secrets) of the company is strictly prohibited. Unauthorized dissemination of this information may result in internal disciplinary action.	ALL
Objective: P	rotection and Privacy of Personal Data	
Description	To ensure the privacy and protection of personal information	ation
ISP-110301	Protection and privacy of Employee's personal use	data
	While Gamuda Group desires to provide a reasonable level of privacy, employees should be aware that the personal use data they create on the corporate system remains the property of Gamuda Group. Because of the need to protect Gamuda Group network, management cannot guarantee the confidentiality of employee's personal use data stored on any device belonging to Gamuda Group	ALL
ISP-110302	Right to Audit	
For security and network maintenance purposes, authorized individuals within Gamuda Group may monitor equipment, system and network traffic at any time. Likewise, Gamuda Group reserves the right to audit networks and system on a periodic basis to ensure compliance with this policy.		ALL
ISP-110303	Privacy of Data for Web Users	
	Gamuda Group is concerned about the way its business partners and itself handles private data of web users. The policy recognizes that information is one of the most valuable assets and issues the following privacy guidelines and recommendations to its business partner that deals with the applications supplied.	ALL



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	Gamuda Group advocate a clear and fair privacy policy. Management must make reasonable efforts to ensure that all personal information is used only as intended, and that precautions preventing misuse are effective and appropriate.		
ISP-110304	Disclosure of Information of Employees		
	Disclosure of private information about the company's workers to third parties shall not take place unless:		
	Required by law or regulation,		
	Permitted by clear and explicit consent of the subject, or		
	 After receipt of written commitment from third party organizations that information will be protected by adequate levels of security and privacy as determined by the Legal & Company Secretarial, and explicit consent is obtained from HRA. 		
Objective: Review of Information Security			
Description	To ensure compliance of system with organizational security policies and standards.		
ISP-110401	Independent review of information security		
	The ISMS Internal Audit must perform compliance checking related to information security Policy, standards and procedures annually. These reviews must include efforts to determine both the adequacy of and compliance with controls.		
ISP-110402	Technical compliance checking		
	Simulation or Penetration testing (to critical services and system) or services must be carried out annually or as needed to ensure compliance with security implementation standards. The testing must be performed by an independent party.		
ISP-110403	Legacy Hardware and System		
	Obsolete or old hardware and system exposes vulnerabilities to Gamuda Group that attributed via product end of life; or product end of support; or decommission hardware and/or system. The	ITAM	



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consequence to this is no security updates from product principal; no technical support; and minimal or not possible to apply latest security control on emerging threat. As a result, malware can easily exploit unpatched vulnerabilities and quickly spread across Gamuda Group network. This may have adverse consequences and high financial cost implication and potential service disruption to Gamuda Group.

 Product end of life is a product at the end of the lifecycle which is a retired from the market that involve pulling the product from the market without replacing it.

Hardware and system administrators must aware and propose to Business Unit for new product or replace with a product with similar or better capability. It is strongly recommended not to have any new development or new investment in system and technology that is end of life.

Should the hardware and or system still made available for use, administrators must ensure that product principal continue to provide post warranty support.

Prior in getting the replacement for retired hardware or system, administrators shall apply short term mitigation to reduce the possibility of compromise by preventing access of untrusted content on vulnerable device.

In case, if the hardware and system cannot be refresh, maintenance from product principal / OEM must be available in ensuring continuous confidentiality, integrity and availability. At the end of principal / OEM support, a third-party maintenance must be made available accordingly.

Product end of support is a product that is ending of services and updates for systems, servers, storage and network equipment. This situation prevents Gamuda Group from



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receiving any updates and support from product principal.

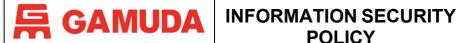
Hardware and System administrators should initiate product end-of-support to be upgraded and replaced with pertinent release. High-risk end user devices and server should be prioritized for upgrades especially devices that can access to more sensitive information or services including personal data.

Hardware and system administrator is responsible to inform Business Unit on product end-of-support and work with them on the mitigation plans and activities in reducing risk for product end of support for hardware and/or system.

 Decommission hardware and system is a situation where the hardware and/or system is retired and replaced by a new system covering the same functionality.

Hardware and system administrator is responsible to isolate and disintegrate decommission hardware and system from the network and to power down from any access. Any need to access to decommission hardware and system must be approved by Business Unit and Head of GIT.

In a situation where a decommission hardware and/or system is still made available to users to allow retrieval of old useful data continuously, the hardware and system must be configured on need-basis to the users with limited accessibility and minimal network connectivity.



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Objective: System Audit			
Description	To maximize the effectiveness of and to minimize interference to/from the system audit process.		
ISP-110501	System Audit Controls		
	Audit requirements and activities involving operation system must be carefully planned and agreed minimize disruptions to business processes.		
	 Audit requirements should be agreed wi ITGC. 	th	
	The scope of the checks or audits should to agreed and controlled.	pe	
	The checks or audits should be limited to rea only access to software and data.	d-	
	4. Access to operational system (if applicable other than read-only should only be allowed for isolated copies of system files, which should be erased when the audit is completed. GIT is inform ITGC upon completion of the tasks for the removal of the affected files.	or pe to	
	Resources for performing the audits or check should be explicitly identified and mad available.		
	Requirements for special or addition processing should be identified and agreed.	al	
	 All access to audited system by any appointed auditors should be monitored at least by or system administrator and logged by GIT produce a reference trail. 	ne	
	All audit procedures, scope, plan ar responsibilities should be documented.	nd	
	Access to system audit tools should to protected to prevent possible misuse compromise.	pe or	