



New Era Technology, Inc. Vendor Management Supplier Security Policy

Classification: Public

Vendor Management Supplier Security Statement

The purpose of the New Era Technology Vendor Management / Supplier Security Policy is to describe the actions and behaviors required to ensure that due care is taken to avoid inappropriate risks to New Era Technology, its business partners, and its stakeholders from any of its vendors and or suppliers.

We expect this policy to be upheld by all employees, (permanent, temporary, or contracted), including executives, officers, and directors of New Era.

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1. Terms and Definitions

| Term / Acronym | Definition / Meaning |
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| “critical vendor” | A critical vendor provides goods or services that cannot be easily and efficiently replaced; a vendor with a specialized skillset, mandatory compliance certification or proprietary product whose discontinuation of service would have a significant negative impact on a New Era Technology’s operation. |
| “data” | are items of information. |
| “information” | Information is processed, organized, and structured data. It provides context for data and enables decision-making processes. Information can be collected, used, stored, reported, or presented in any format, on any medium. |
| “information resource” | means information and related resources, such as personnel, equipment, funds, and information technology. |
| “risk” | per ISO 27005 risk is defined as “potential that a given threat will exploit vulnerabilities of an asset or group of assets and thereby cause harm to the organization”. |
| “staff”, “users”, “personnel” | means those who are employed by New Era Technology on a fulltime, part-time, or temporary basis; those who access and / or utilize New Era Technology’s information resources, including, but not limited to employees, contractors, interns, third and external parties. |
| “vendor”, “supplier” | used interchangeably. A vendor, or a supplier, is a supply chain management term that means a company who provides goods or services of experience to another entity. Vendors may sell B2B (business-to-business, i.e., to other companies), B2C (business to consumers), or B2G (business to government). Some vendors manufacture inventoriable items and then sell those items to customers, while other vendors offer services or experiences. The term generally applies only to the immediate seller, or the organization that is paid for the goods, rather than to the original manufacturer or the organization performing the service if it is different from the immediate supplier ¹ . |
| “we”, “our”, “New Era”, or “New Era Technology” | refers to New Era Technology, Inc., and its subsidiaries. |

2. Scope

In line with the New Era Cloud Computing Policy, the New Era Technology Vendor Management / Supplier Security Policy applies to any individuals that interact, set up or manage any New Era Technology vendors and/or suppliers, from now on referred to as “vendors”.

This Policy applies to all New Era Technology's remote workers, permanent, and part-time employees, contractors, volunteers, suppliers, interns, and/or any individuals with access to New Era's electronic systems, information, software, and/or hardware.

The terms set out in this Policy work in conjunction with, and do not replace, amend, or supplement any terms or conditions of employment stated in any collective bargaining agreements and/or employment contracts.

This Policy is not intended to restrict communications or actions protected or required by regional/local laws and regulations.

Relationship to Local/Regional Policies

This Policy is New Era's corporate policy. New Era Technology business units and/or subsidiaries may complement this with a local/regional vendor management or supplier security policy however, this Policy shall always be the minimum standard; a local/regional policy may augment, or increase the standards, but shall not detract from the New Era Technology vendor management or supplier security standards.

If any additional vendor management or supplier security policies are developed, Director of Governance, Risk and Compliance (GRC) must review and approve prior to release and publication.

3. Roles and Responsibilities

The Director of Governance, Risk and Compliance (GRC) and the Chief Technology Officer are responsible for the New Era Technology Security framework and its associated policies.

This Policy is reviewed annually by members of GRC. Any changes to this Policy will be approved by New Era Technology's Chief Technology Officer and Director of Governance, Risk, and Compliance prior to its release.

Suggestions for change to this Policy should be reported to GRC@neweratech.com.

All employees, contractors and third parties who access New Era Technology's information must abide by this and associated policies.

Technology owners are responsible for technical standards applicable to their operating environments and domains.

Line managers have day-to-day responsibility for this policy, and employees should refer any questions about this policy to them in the first instance.

In line with their applicable solutions groups, New Era's business units shall develop, disseminate, and maintain formal, documented processes and/or procedures to facilitate the implementation of this Policy and, where applicable, any local/regional access management policies. The processes and procedures shall be consistent with applicable laws, executive orders, directives, policies, regulations, and/or standards.

4. Policy

Assessments

1. Vendors granted access to New Era Technology Information Resources must sign the New Era Technology Vendor Non-Disclosure Agreement/Business Associate Agreement.
2. Vendors must be evaluated prior to the start of any service and thereafter on an annual basis.
3. High risk findings must be followed up to verify remediation.
4. A vendor risk assessment must be performed on vendors with physical or logical access to New Era Technology internal and/or confidential information or that are considered critical vendors.
5. Risk assessments must be performed on all requested cloud providers before approval.
6. Vendors with PCI DSS compliance requirements must have their status reviewed on an annual basis.

Management

1. Vendor agreements and contracts must specify:
 - a. The New Era Technology information the vendor should have access to,
 - b. How New Era Technology information is to be protected by the vendor,
 - c. How New Era Technology information is to be transferred between New Era Technology and the vendor/supplier,
 - d. Acceptable methods for the return, destruction or disposal of New Era Technology information in the vendor's possession at the end of the contract,
 - e. Minimum information security requirements,
 - f. Incident response requirements,
 - g. Right for New Era Technology to audit vendor.
2. If a vendor subcontracts part of the information and communication technology service provided to New Era Technology, the vendor is required to ensure appropriate information security practices throughout the supply chain and to notify New Era Technology.
3. The vendor is permitted to use New Era Technology Information Resources only for the purposes of the business agreement and for no other purpose.
4. Work outside of defined parameters in the contract must be approved in writing by the appropriate New Era Technology point of contact.
5. Vendor performance must be reviewed annually to measure compliance to implemented contracts or SLAs.
 - a. In the event of non-compliance with contracts or SLAs regular meetings will be conducted until performance requirements are met.
6. Any other New Era Technology information acquired by the vendor in the course of the contract cannot be used for the vendor's own purposes or divulged to others.

7. Vendor personnel must report all security incidents directly to the appropriate New Era Technology IT personnel within the timeframe defined in the contract.
8. Vendors with logical access to information resources must provide non-repudiation authentication mechanisms.
9. Upon departure of a vendor employee from the contract for any reason, the vendor will ensure that all sensitive information is collected and returned to New Era Technology or destroyed within 24 hours.
10. Upon termination of contract or at the request of New Era Technology, the vendor must surrender all New Era Technology badges, access cards, equipment and supplies immediately.
 - a. Equipment and/or supplies to be retained by the vendor must be documented by authorized New Era Technology IT management.

5. Compliance, Monitoring and Enforcement

This Policy is intended for all New Era businesses, in all countries.

New Era Technology seeks to proactively prevent and mitigate instances of non-compliance with this Policy.

Compliance is measured through various methods, including but not limited to risk assessments, business tool reports, internal and external audits, etc.

Any breaches or concerns, including ethical concerns or potential breaches in our commitment to information and data protection standards, should be reported as soon as possible through our Whistleblowing Policy.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this Policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to GRC@neweratech.com.

Any exception to this Policy must be approved by the New Era Technology's Chief Technology Officer, or delegate and / or Director of Governance, Risk, and Compliance in advance.

Personnel found to have intentionally violated this Policy may be subject to disciplinary action, up to and including termination of employment and other penalties as set forth herein. New Era Technology reserves the right to pursue any, and all, legal and civil action in connection with any such violation.

Any vendor, consultant, or contractor found to have violated this Policy may be subject to sanctions up to and including removal of access rights, termination of contract(s), and related civil or criminal penalties.

6. Acknowledgement

Those in receipt of this Policy acknowledge its receipt and understanding of its contents; and that New Era Technology expressly reserves the right to change, modify, or delete its provisions without notice.

Document Information

| Reference | Security Framework |
|--------------------------------|---|
| Title | Vendor Management /Supplier Security Policy |
| Purpose | The purpose of the New Era Technology Vendor Management / Supplier Security Policy is to describe the actions and behaviors required to ensure that due care is taken to avoid inappropriate risks to New Era Technology, its business partners, and its stakeholders from any of its vendors and or suppliers. |
| Owner | Governance, Risk & Compliance (GRC) |
| Document Approvers | Chief Technology Officer (CTO) Director of Governance, Risk & Compliance (GRC) |
| Intended Audience | New Era Technology permanent, temporary, and contracted staff. |
| Review Plan | Annually |
| Document Classification | Public |

Document History

| VERSION CONTROL | | | |
|-----------------|--------------|--|-----------------------|
| Revision | Date | Record of Changes | Approved /Released By |
| V1.0 | Nov 3, 2022 | Approved release | CTO, Dir GRC |
| V2.0 | Sep 17, 2023 | Annual review; classification & approvers update | CTO, Dir GRC |
| V3.0 | Sep 20, 2024 | Annual review, updates to sections 2,3,5,6 | Dir GRC |
| V3.0 | Oct 18, 2024 | Approved release | CTO, Dir GRC |

Control of Hardcopy Versions

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| Document Ref. | Rev. | Uncontrolled Copy | X | Controlled Copy |
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References

| Standard / Framework / Other | Title | Description |
|------------------------------|---|---|
| New Era GRC Policy | Security Policy | Policy to (a) protect New Era Technology and its customers' data and infrastructure, (b) outline the protocols and guidelines that govern cyber security measures, (c) define the rules for company and personal use, and (d) list the company's disciplinary process for policy violations. |
| New Era GRC Policy | Acceptable Use Policy | Policy to establish acceptable practices regarding the use of New Era Technology Information Resources to protect the confidentiality, integrity, and availability of information created, collected, and maintained. Inappropriate use exposes New Era to risks, including virus attacks, loss of confidential data, compromise of network systems and services, and legal issues. |
| New Era GRC Policy | Cloud Computing Policy | Policy to define the activities associated with the provision of security for cloud-supported activities that protect New Era Technology's cloud-based information systems, networks, data, databases and other information assets. |
| New Era GRC Policy | Risk Management Policy | Policy establishing the requirements for the assessment and treatment of information security-related risks facing the business. |
| ISO/IEC 27005:2018 | Information technology — Security techniques — Information security risk management | Guidelines for information security risk management. |
| ISO/IEC 27001:2022 | Information security, cybersecurity and privacy protection — Information security management systems — Requirements | Requirements to meet the Standard. |
| NIST SP 800-53 | Security and Privacy Controls for Information Systems and Organizations | Catalog of security and privacy controls for information systems and organizations. |