



ITC Limited

Information Management Policy

Version 2.0

2nd January, 2025

1. Objective

To establish and manage an integrated framework of Information Governance, Information Security and IT Service Delivery that serves as an effective tool for the Organization to achieve its business objectives and comply with the statutory and regulatory requirements with regard to Information Security.

2. Applicability

Policies detailed in this document are applicable across all units of all the businesses (comprising Divisions, SBUs, and Corporate) of the Company, Central Shared Services Teams for IT related services and the IT infrastructure and application services extended to the Subsidiary and Associate Companies based on their request.

3. Responsibility

It shall be the responsibility of the various officers of the Company, occupying positions between the Unit Head and the Divisional Chief Executive, to monitor compliances with the Information Management Policy in their area of operations. It shall be the overall responsibility of the Divisional Chief Executive to ensure, through the Unit Head, that the stated responsibilities are being discharged.

4. Policy

It is ITC's policy:

Overall Governance

- To establish a well-defined Governance Structure across the Company to facilitate application of Information Management Policy to business needs and ensure effective management of Information security risks;
- To ensure effective implementation and compliance with the Information Management Policy;
- To ensure that Information Management Policy and its related processes comply with the statutory, regulatory and contractual requirements;

Information Security Management

- To ensure effective management and protection of Company's IT & Information Assets and data throughout their lifecycle for confidentiality, availability and integrity;
- To provide IT access to users on a 'need to know' and 'need to do' basis;
- To ensure that identified events and access to information systems are logged and monitored;
- To ensure that Company's IT Systems and Networks are adequately secured;
- To define the framework for IT and OT interface management and segregation of information;
- To define Company's Policy on use of its Information Assets in order to safeguard Company's interests;
- To protect Company's information systems and information processing facilities from unauthorized physical access, loss, damage and interference;
- To ensure that employees understand their roles and responsibilities as stated in the Information Management Policy;

Technology Adoption and Project Management

- To create a framework for assessment and adoption of emerging technology to provide innovative, user-friendly and agile solution for business to stay competitive while managing risks to an acceptable level;
- To ensure that IT initiatives executed meet timelines, budget and quality parameters and IT systems developed and deployed meet the agreed business requirements and address confidentiality, integrity, availability and auditability requirements;

IT Service Management

- To ensure availability of IT systems and data as per business requirements;
- To provide necessary support for ongoing maintenance of IT infrastructure and applications;
- To provide requested IT services to users in accordance with agreed timelines;
- To restore IT services at the earliest in case of breach or attempted breach of confidentiality, integrity and availability of Information Assets and minimize recurrence of such incidents;
- To procure IT Products and IT services at competitive cost ensuring best buy and best value for the Company;
- To ensure that the suppliers and their performances are managed appropriately to support seamless provisioning of IT products and services in accordance with Company's information security policies;

5. Review

The Information Management Policy shall be reviewed at least once every 2 years or as and when required.