



LUKE HUGHES & COMPANY

INFORMATION SECURITY POLICY

OBJECTIVE

The objective of the policy is to ensure that all information and information systems upon which the Company depends are adequately protected. Ultimate responsibility for information security rests with the Managing Director.

LEGAL REQUIREMENTS

The Company will abide by all UK legislation related to the holding and processing of information.

COMPUTER EQUIPMENT

The Company has established a number of safeguards to ensure the security of information held on computers. Employees must seek authorisation to load software on to any computer or server and must not remove hard or electronic data from the Company's premises without prior authorisation. Only authorised software may be installed or used on any of the Company's computer equipment. All individual computers are protected by passwords. The Company has a consultancy agreement with an IT specialist who advises on security matters.

INTELLECTUAL PROPERTY

The Company ensures its employees are made aware that intellectual property, confidential knowledge or information they have access to, or acquire or gain, whilst working for the Company belongs to the Company or its customers or suppliers. The Company requires all employees to keep all such property and information confidential and not use it for personal or any other person's or organisation's benefit. This duty applies during and after employment.

DATA PROTECTION

The Company requires all employees to comply at all times in their information-handling practices with the eight data protection principles that are central to the Data Protection Act 1998. If employees are in any doubt about what can or cannot be disclosed, and to whom, they must not disclose it but seek further advice from a Director.

BUSINESS CONTINUITY AND DISASTER RECOVERY

The Company ensures that critical information, databases, the design server and graphics server are backed-up on a daily basis on external hard drives. These drives are stored in a fire-proof safe (Rosengrens MultiData D202—Fire class S60DIS). A copy of the back-up is kept off-site and is updated monthly.

Signed:

LUKE HUGHES
Managing Director

Date: 30 August 2009