



Information Security Policy Statement

ISO27001:2013 ISMS

Rev. February 2022

The following is the **Information Security Policy Statement** for Athena Global Advisors, Inc., referred to below as 'Athena', 'we', 'us', and 'our'.

POLICY

We have implemented an Information Security Management System (ISMS) using the framework and requirements as set forth in the ISO/IEC 27001:2013 standard. The unique needs and objectives, security requirements, organizational processes used, and the size and structure of this organization and those we service influence the establishment and implementation of our ISMS.

It is our policy that all information and data used to conduct Athena business (whether Athena-generated, employee, or client) is defined as "Athena Information," and it is incumbent upon us to protect it. Specifically, it is our policy that all Athena Information:

- Is properly categorized
- Is protected against unauthorized access or disclosure
- Is protected against unauthorized or inappropriate modification
- Is protected against unwanted loss or destruction
- Is maintained in a manner that ensures it is available to those persons appropriately authorized

Any individual dealing with Athena information, regardless of their status (e.g. employee, contractor, vendor, etc.) must comply with this and related policies. All Directors and Managers are directly responsible for implementing this and related policies within their business areas, and for adherence by their staff.

Our Chief Executive Officer (CEO) is responsible for the organization's commitment to information security, and for authorizing this policy.

Our Chief Operating Officer (COO) is responsible for the overall direction of the organization's goals for Athena and Athena's information assets.

Our Chief Information Officer (CIO) and any of their appointed designee(s) are authorized by the CEO and have direct responsibility and dual authority with the COO for maintaining this policy, the ISMS, organization-level policies, associated governance and standards, and for providing advice and guidance on the departmental policies that are governed by these standards.

Our Directors and Managers, under authorization of the COO and guidance of the CIO, are directly responsible for designing and implementing the relevant policies and procedures within their respective areas of responsibility at Athena, for ensuring they are compliant with the directives in the ISMS, and for adherence by their staff.

Finally, as the unique needs, requirements, and indeed even the stakeholders in our program evolve, we must ensure that our program continues to meet and service them. Therefore, we are committed to a program that both monitors the performance of and ensures the continuous improvement of our ISMS.

It is the responsibility of each individual to adhere to this and all related Athena policies. Failure to do so is subject to disciplinary action.

Maggy Wilkinson, CEO