Athena Information Security Policy Statement ISO27001 ISMS

Rev. April 2025

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 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 authorizes the Information Security Management System Team's ("ISMS Team") Executive Leadership, as defined in the Athena ISMS Register of Roles, to implement, manage, maintain, and enforce the ISO27001 program and associated technical and operational measures necessary to the program.

Our ISMS Team and any of their appointed designee(s) are authorized and have direct responsibility 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 VPs, Directors and Managers, with the guidance of the ISMS Team, 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 everyone to adhere to this and all related Athena policies. Failure to do so is subject to disciplinary action.

Margaret Wilkinson
Maggy Wilkinson, CEO