

IMS POLICY – Public



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1 INTRODUCTION

This policy defines how Information Management Systems will be set up, managed, monitored, reviewed, and continually improved within Cowrywise.

The Executive Management of Cowrywise, located at 5C Reverend Ogunbiyi Street, Ikeja GRA, Lagos, is committed to ensuring the security of information and the continuity of critical business operations. In line with this commitment, Cowrywise is pursuing full certification to **ISO/IEC 27001** and **ISO 22301**, demonstrating adherence to internationally recognised best practices in information security and business continuity, validated by an independent third-party assessment.

1.1 PURPOSE

The purpose of this document is to define an overall policy regarding management systems that is appropriate to the purpose of Cowrywise, and includes:

- A framework for setting objectives
- A commitment to satisfying applicable requirements
- A commitment to continual improvement of the management systems

This Policy is available in electronic form and will be communicated within the organisation and, where relevant, to stakeholders and interested third parties.

1.2 IMS POLICY STATEMENT

Cowrywise's current strategy and Integrated Management System (IMS) provides the context for identifying, assessing, evaluating and controlling information/process/service-related risks through the establishment and maintenance of the IMS. The risk assessment and risk treatment plan capture how identified risks are controlled in alignment with Cowrywise's risk management strategy.

Cowrywise defines the main purpose of the IMS listed below:

1. Understand the needs of Cowrywise and the necessity for establishing Business Continuity and Information Security policy and objectives.
2. Implement and operate controls and measures for managing the overall capability of Cowrywise to manage disruptive incidents, Information security and its IT assets.

3. Monitor and review the performance and effectiveness of the Business Continuity Management System (**BCMS**) and Information Security Management (**ISMS**).
4. Continually improve Cowrywise's integrated management system based on objective measurement.

1.4 REQUIREMENTS

A clear definition of the requirements for the Management Systems (**ISO 27001:2022** and **ISO 22301:2019**) will be agreed, implemented, and maintained with the business so that all activities are focused on the fulfilment of those requirements. Statutory, regulatory and contractual requirements will also be documented and input to the planning process. Specific requirements with regard to the security of new or changed systems or services will be captured as part of the design stage of each project.

1.5 TOP MANAGEMENT LEADERSHIP AND COMMITMENT

Commitment to the Management Systems extends to senior levels of the organisation and will be demonstrated through this IMS Policy and the provision of appropriate resources to provide and develop the management systems and associated controls.

1.6 FRAMEWORK FOR SETTING OBJECTIVES AND POLICY

The high-level objectives for the Integrated Management System within Cowrywise are defined. These overall objectives will be used as guidance in the setting of lower-level, more short-term objectives within an annual cycle timed to coincide with organisational budget planning. This will ensure that adequate funding is obtained for the improvement activities identified. These objectives will be based upon a clear understanding of the overall business requirements, informed by the quarterly management review with stakeholders.

1.8 CONTINUAL IMPROVEMENT POLICY

Cowrywise policy concerning Continual Improvement is to:

- Continually improve the effectiveness of the IMS across all areas within scope.
- Enhance current processes to bring them into line with good practice as defined within ISO/IEC 27001 and ISO 22301.
- Achieve certification of the management systems and maintain them on an ongoing basis.

- Increase the level of proactivity (and the stakeholder perception of proactivity) about the ongoing management of the IMS.
- Make processes and controls more measurable to provide a sound basis for informed decisions.
- Achieve an enhanced understanding of and relationship with the business units to which the IMS applies.
- Review relevant metrics on an annual basis to assess whether it is appropriate to change them, based on collected historical data.
- Obtain ideas for improvement via regular meetings with stakeholders and document them in a Continuous Improvement Log.
- Review the Continual Improvement Log at regular management meetings to prioritise and assess timescales and benefits