

# Access Management Policy



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<b>Classification</b>	<b>PUBLIC</b>

## Overview

This Access Management policy describes provisioning, management, monitoring, and de-provisioning of user accounts and privileges, operating under the principle of least privilege.

## Applicability

The applicability of this statement falls under purview of the [Security Documentation Overview](#).

## Scope

This policy applies to employee/contractor access to systems that process or store customer data.

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## Access Management Policy

### *Principle of Least Privilege*

Access controls must be allocated on the basis of business need and 'Least Privilege'. Users must only be provided with the absolute minimum access rights, permissions to systems, services, information and resources that they need to fulfil their business role.

### **User Access Account Management**

User account management procedures must be implemented for user provisioning, modification, and de-provisioning on all Company systems.

Procedures shall be established for all information systems to ensure that users' access rights are adjusted appropriately, and in a timely manner, whenever there is a change in business need, a user changes their role, or a user leaves the organization.

All additions, deletions, suspensions and modifications to user accesses should be captured in an audit log showing who took the action and when.

### **Access Monitoring**

User access management reviews will be conducted quarterly for in-scope systems.

Access reviews will validate the consistency and effectiveness of access provisioning and deprovisioning processes for all in scope systems including the appropriate allocation of roles and privileges.

All user accounts that have not been accessed for a period of inactivity appropriate for the systems, without prior arrangement, must be disabled.

## **Authentication**

All access to Company information systems must be controlled by an approved authentication method supporting a minimum of a user ID and password combination that provides verification of the user's identity. Additional authentication requirements are detailed within the [Password Policy](#).

Access to networks occurs through MFA and VPN, controlled by various user access groups.

## **Unique Account Identifiers**

All individual user IDs must be unique for each user.

Users will normally be limited to only one user account for each individual information system for non-administrative purposes. Any variations from this policy must be authorized by appropriate Management.

Shared accounts are prohibited by default. Exceptions must be authorized by appropriate management.

## **Privileged Access**

All administrative/privileged user accounts must be based upon job function and authorized by the appropriate management, prior to access being given. All changes to privileged accounts must be logged and regularly reviewed.

User accounts for privileged access must be separate from a user's normal user account (for non-privileged access).

Passwords for privileged user accounts must be rotated at least annually where MFA is in place and quarterly without MFA.

## **Management Oversight**

### **VP of Information Security**

The VP of Information Security is responsible for ensuring that the requirements of this policy are implemented within any program, projects, systems or services for which they are responsible.

The VP of Information Security is responsible for ensuring that a robust checking regimen is in place and complied with to ensure that legitimate user access is not abused.

The VP of Information Security may delegate responsibility for the implementation of the policy but retains ultimate accountability for the policy and associated checking regimen.

### **Managers**

Managers are responsible for ensuring that members of their team have the minimum levels of access to systems they need to perform their job and comply with role-based access principles.

### **System Custodians**

System Custodians are privileged users responsible for administering system access. Custodians are responsible for collaborating with Managers to determine how to appropriately define and allocate roles and permissions to Users.

System Custodians are empowered to make access approval and exception decisions within the scope of the systems they administer.

System Custodians are responsible for ongoing monitoring of user access to the systems they administer, independently of formalized quarterly access reviews.

## Users

Users must only access Company systems and data for legitimate use as required by their job and role.

## Additional Information

Additional information related to *Disciplinary Actions*, *Exceptions* and *Questions* can be found in the [Security Documentation Overview](#) .

## Document control

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## Version History

Date	Author(s)	Version	Changes
Feb 13, 2026	Paul Gordon Angelina Kilmer	3.0	Annual Review
Apr 21, 2025	Art Machado Angelina Kilmer	2.2	Added details regarding System Custodian responsibilities.
Mar 3, 2025	Art Machado	2.1	Privileged account update
Feb 21, 2025	Art Machado Angelina Kilmer Paul Gordon	2.0	Annual Review
Nov 01, 2024	Angelina Kilmer	1.6	Updated Policy classification from Confidential to Public

Mar 12, 2024	Art Machado Sarah Zwicker Paul Gordon	1.5	Annual review
Dec 4, 2023	Sarah Zwicker	1.4	Linked Password Policy
Aug 29, 2023	Sarah Zwicker	1.3	Removed ISO Annex control language
Feb 23, 2023	Art Machado Sarah Zwicker	1.2	Annual review + logo updated
Apr 13, 2022	Sarah Zwicker	1.1	Initial Review and Approval
Mar 31, 2022	Art Machado Sarah Zwicker	1.0	Original version