

# Vulnerability Management Policy



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

## Overview

The Vulnerability Management Policy defines the types of activities for regular vulnerability assessment of hosted / customer-facing systems. Internal vulnerability assessment activities and the time frames for each are defined, as is the use of independent parties for validation and verification. The policy also addresses patching requirements for third party components.

## Applicability

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

## Scope

To ensure that the Company consistently identifies and remediates vulnerabilities impacting its application solutions and infrastructure promptly and in a way that aligns with customer expectations and industry standards to ensure security and privacy.

This document covers vulnerability management for all Company developed and/or hosted application solutions and infrastructure.

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## Vulnerability Management Policy

### Vulnerability Classifications

All vulnerabilities are subject to the same classification system and remediation SLAs.

Severity	Remediation SLA
Critical	ASAP (not to exceed 30 days)
High	30 days
Medium	90 days
Low	Prioritized backlog

### Vulnerability Testing & Proactive Detection

The Company shall proactively attempt to detect vulnerabilities in their software products and infrastructure. This shall be done by performing regular vulnerability tests against both engineering releases and SaaS deployment environments.

✓ SOC 2: CC6.8, CC7.1

The entity implements controls to prevent or detect and act upon the introduction of unauthorized or malicious software to meet the entity's objectives.

To meet its objectives, the entity uses detection and monitoring procedures to identify (1) changes to configurations that result in the introduction of new vulnerabilities, and (2) susceptibilities to newly discovered vulnerabilities.

## Network Scanning

### External Vulnerability Scanning

**Definition:** a network port scan initiated from a system outside our controlled network, which mimics the access that a potential bad actor could have to our systems.

The Company will perform external vulnerability scanning for each Company-hosted product line on a monthly basis.

### Internal Vulnerability Scanning

**Definition:** a network port scan initiated from a system trusted by our controlled network, which could potentially have more access than a potential bad actor could have to our systems.

The Company will supplement external vulnerability scanning with internal scans on an as needed basis to ensure comprehensive vulnerability testing coverage.

## Infrastructure Patching

The Company is responsible for monitoring and patching vulnerabilities in 3rd party infrastructure and software.

## Application Vulnerability Testing

### Static Application Security Testing (SAST)

Each of the Company's product engineering teams must perform Static Application Security Testing as a required step its software development life cycle. Each team may use its own discretion in determining the timing and cadence for this testing as long as it is performed for all new major release candidates.

### Dynamic Application Security Testing (DAST)

Each of the Company's product engineering teams must perform Dynamic Application Security Testing as a required step its software development life cycle. Each team may use its own discretion in determining the timing and cadence for this testing as long as it is performed for all new major release candidates.

Dynamic Scanning should only be performed in Engineering verification and validation environments.

### Software Composition Analysis (SCA)

Software Composition Analysis is used to identify vulnerabilities in 3rd party code that is being used in Company applications.

Each of the Company's product engineering teams must perform Software Composition Analysis as a required step its software development life cycle. Each team may use its own discretion in determining the timing and cadence for this testing as long as it is performed for all new major release candidates.

## Software License Management

The objective of Software License Management is to ensure that the Company is tracking the licensing which applies to all 3rd party software that it is leveraging within its application solutions and to identify any applicable licensing which presents potentially problematic terms and conditions.

Each of the Company's product engineering teams is responsible for tracking the licenses for any 3rd party software components that it is using within the product line. This information must be readily accessible and up to date for periodic assessment.

#### **External Application Penetration Testing**

The Company will engage an accredited 3rd party service provider to perform penetration testing on all its active product lines, as deemed necessary, on at least an annual basis. The scope of penetration tests must follow industry best practice. As with all vulnerability testing, these penetration tests must be performed in non-production hosted environments, which replicate production sites.

#### **Client Driven Security Testing**

Client driven security scans, security testing, and any form of penetration testing is expressly prohibited. The Company performs comprehensive security testing and vulnerability management and makes relevant assurance documentation available to its clients upon request through its independent security audit and certification programs.

#### **Vulnerability Management Life Cycle**

All hosted environments must have protections in place to prevent the spreading of viruses and malware. This may be accomplished using mechanisms such as file scanning, behavioral malware protection, zero day mitigation, etc.

#### **Vulnerability Triage**

Results of vulnerability testing must be promptly assessed to validate each finding and to verify appropriate severity classification. The hosting and engineering teams performing the testing are responsible for this initial triage and subsequent assignment and scheduling of remediation work as appropriate. Triage results are subject to Security Team review and approval. Vulnerability classifications are based on industry standards and any adjustments to classifications must undergo Security Team oversight.

In the case of external penetration testing, the Company's Security Team is responsible for triage in collaboration with the appropriate internal teams.

Vulnerabilities reported or discovered through channels other than internal and external testing (for example, zero-day vulnerabilities, client reported issues, etc.) must undergo the same severity-based prioritization process as any other vulnerabilities.

#### **Vulnerability Remediation**

Vulnerability test findings, once triaged and assigned, must generally be remediated within the prescribed timelines associated with each severity classification (see [Remediation SLA table](#) above). Exact remediation timelines for non-critical vulnerabilities may be adjusted to align with relevant release schedules. However, any significant variances from the standard remediation timeline must be approved and managed by the Security Team.

#### **SaaS Environment Monitoring**

The Company shall actively monitor system components and operational configurations to prevent the introduction of new vulnerabilities resulting from configuration or operational deployment choices.

The monitoring methodology may vary due to deployment choices, but likely includes one or more of the following type of applications: Security Information and Event Management systems (SIEM), AV or Malware agents, Web Application Firewalls (WAFs), and Endpoint Detection and Response (EDR) systems. EDR capabilities – in particular behavioral antivirus detection and zero-day mitigation – are required in all environments.

Anti virus/malware scanning is required:

1. For all client uploads
2. At build time for all containerized environments
3. For all non-containerized/non-read-only environments

Anti virus/malware scanning may be performed via periodic full scans or minimally upon file access.

∨ SOC 2: CC7.2

The entity monitors system components and the operation of those components for anomalies that are indicative of malicious acts, natural disasters, and errors affecting the entity’s ability to meet its objectives; anomalies are analyzed to determine whether they represent security events.

### Confidentiality of Vulnerability Management Data

Vulnerability testing techniques, tools, and results are all considered highly sensitive and restricted information and may not be shared externally under any circumstances.

### Document control

**i** This policy is only controlled in its live, digital format. Any other format or export of this policy is an uncontrolled version of this document

<b>Document Owner</b>	Art Machado	
<b>Author(s)</b>	Art Machado, Angelina Kilmer, Paul Gordon	
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<b>Review cycle</b>	ANNUAL	
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### Version History

Date	Author(s)	Version	Changes
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Mar 13, 2026	Art Machado Angelina Kilmer Paul Gordon	5.1	Clarification on zero-day vulnerabilities and industry best practices
Mar 2, 2026	Angelina Kilmer Paul Gordon	5.0	Annual Review
Jun 12, 2025	Art Machado Angelina Kilmer	4.1	Added mechanisms used for Vulnerability Management and section regarding Client driven security testing section
Feb 25, 2025	Art Machado Angelina Kilmer Paul Gordon	4.0	Annual review
Oct 28, 2024	Art Machado Angelina Kilmer Paul Gordon	3.2	Malware scanning updates. Changed Policy classification from Confidential to Public
Mar 28, 2024	Art Machado Sarah Zwicker Paul Gordon	3.1	Annual review
Jul 25, 2023	John Cole	3.0	Updated monitoring and prevention methods
Feb 23, 2023	Sarah Zwicker Art Machado	2.9	Annual review + logo updated
Nov 30, 2022	Sarah Zwicker Art Machado	2.8	Added section on scanning + zero day mitigation
Mar 24, 2022	Sarah Zwicker	2.7	Added Privacy considerations and components
Mar 16, 2022	Sarah Zwicker Art Machado	2.6	Title change for VP InfoSec, Annual Policy Review
May 18, 2021	Art Machado	2.5	Policy re-written to match updated Company standards.
Mar 11, 2021	Sarah Zwicker	2.4	Changed owner, updated Overview
Feb 9, 2021	Sarah Zwicker	2.3	Reformatted, policies linked

Jan 26, 2021	John Cole	2.2	Annual review, role title change
Nov 23, 2020	Sarah Zwicker	2.1	Changed owner. Added sections to refer to LTG policies and organizational change.