

INFORMATION AND DATA SECURITY POLICY



Established in 1897, we are one of the UK's leading family-owned development, building and property maintenance companies. We employ 6,000 people and work with a wide range of public and private-sector customers and partners. In 2024, we generated profits of £31.4m from a turnover of £2.4bn. Now in our fourth generation of family ownership, we're committed to the long-term sustainability of the built environment and to making our industry more inclusive and representative of the communities we work in. We are one of The Times Top 50 Employers for Gender Equality 2023 and an Investors in People Gold accredited company. We are driven by our purpose of reimagining places for people to thrive.

We recognise our ethical, legal and professional duty is to ensure that the information we hold conforms to the principles of confidentiality, integrity and availability. It is key to our ongoing operations and the good governance of Wates and enables us to:

- Achieve our stated targets and goals
- Ensure we remain the service provider of choice

Our approach to information and data security is one of sensible risk identification and management.

We hold the confidentiality, integrity and availability of the information and data used to deliver products and services in the highest regard and comply with all legal requirements.

We work with our customers, suppliers and stakeholders to develop a clear understanding of our obligations to maintain appropriate information and data security standards. We are committed to developing, reviewing, maintaining and protecting our information and data systems, improving performance, as well as implementing systems and solutions that are monitored as part of a professional, governed framework.

We have processes in place to manage events that might occur within the IT infrastructure to ensure normal operation and appropriate escalation of issues.

Through regular reviews we aim to deliver a consistent approach to deployment, to mitigate risk and deliver quality services and products on budget every time.

We are committed to implementing and maintaining information management and security techniques supporting our customers, suppliers and key stakeholders.

The Executive Committee has overall responsibility for ensuring this policy is complied with. It will be reviewed at least once a year and at such other times as may be required, to ensure it remains relevant and appropriate to the aims and objectives of our business.

For and on behalf of the Executive Committee

EOGHAN O'LIONAIRD
Chief Executive, June 2025

Where personal data forms part of this information, we are committed to demonstrating and ensuring compliance with the GDPR and the Data Protection Act 2018. In adhering to this policy, we will:

- Actively protect all Wates information systems (including computers, mobile devices, networking equipment, software and data) to mitigate risks associated with theft, loss, damage or abuse
- Provide a safe and secure information systems working environment for staff and authorised users, through privacy by design. Information will be protected against loss or corruption by appropriate back-up and recovery processes
- Maintain processes that facilitate appropriate access to Wates IT facilities and mitigate risk to us and key stakeholders
- Communicate an understanding of compliance with this policy, relevant codes of practice and procedures
- Maintain appropriate disaster recovery plans to mitigate the risk of scenarios that may impact our information and data security management systems
- Ensure that identified breaches of this policy are properly reported, investigated and where necessary concluded through referral to our disciplinary procedures and in compliance with the GDPR and the Data Protection Act 2018

This policy applies to all our employees and those working with us or on our behalf. Successful implementation requires everyone to cooperate, commit and assist us to ensure that information and data security issues and risks are given adequate consideration.

