

# Recertification & Transition Assessment Report

## Pisys Ltd

Assessment dates	24/03/2025 to 27/03/2025 (Please refer to Appendix for details)
Assessment Location(s)	Aberdeen (000)
Report author	Kalpeshkumar Patel
Assessment Standard(s)	ISO/IEC 27001:2013



## Table of contents

Executive summary .....	3
Changes in the organization since last assessment.....	3
NCR summary graphs .....	4
Your next steps .....	5
NCR close out process .....	5
Assessment objective, scope and criteria.....	6
Statutory and regulatory requirements .....	6
Assessment participants .....	6
Assessment conclusion .....	7
Findings from previous assessments .....	8
Findings from this assessment .....	10
Opening Meeting: .....	10
Business Update and Changes to the ISMS, Review of Previous Findings: .....	10
Organisational Context, Interested Parties, Scope, and ISMS Documentation: .....	10
Leadership and Commitment:.....	11
Planning & Operations: .....	12
Performance Evaluation & Improvement: .....	14
Nonconformity, Incident and Complaints, Corrective Action, and Continual Improvement: ..	15
Resources; Physical and Environmental Security:.....	16
Communication: .....	17
Documented Information & Record Retention: .....	17
Human Resource (Screening & Background Checks):.....	19
Access Control: .....	20
Assets Management: .....	22
IT Operational Security, Network Security, Cryptography: Encryption Key Management & Regulation: .....	23
Software / System Acquisition, Development and Maintenance & Project Management: .....	27
Supplier Security (Selection / Review / Monitoring / NDA):.....	28
Business Continuity Management / ICT Readiness: .....	29
Legal / Regulatory / Contractual Compliance: .....	30
Competency, Awareness and Training (Staff Interview): .....	32
Closing Meeting:.....	33
Minor (2) nonconformities arising from this assessment. ....	34
Next visit objectives, scope and criteria .....	35
Next visit plan.....	36
Appendix: Your certification structure & ongoing assessment programme .....	37
Scope of certification .....	37
Assessed location(s) .....	37
Certification assessment programme .....	39
Mandatory requirements – recertification .....	41
Expected outcomes for accredited certification .....	42
Definitions of findings: .....	43
How to contact BSI.....	43
Notes.....	43
Regulatory compliance.....	44

## Executive summary

I would like to thank the audit participant for their assistance and co-operation which allowed the audit to run effectively.

This audit has been conducted remotely utilising Information and Communications technology, specifically Microsoft Team as permitted under this schemes requirement and fulfilling BSI GP145 and BSI GF058 risk criteria.

The audit followed the assessment agenda as communicated in Programme Management Report. The planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit.

A positive observation is hereby raised with regards the organisation implementing improvement initiatives and Management approach during this assessment

### Minor NCRs

- # Clause 5.2 - Organisation has not demonstrate the methods of communication within Information Security Policy Statement
- # Clause 9.3.2 - Changes in the needs and expectations of interested parties has not been reviewed in the ISMS Management Review Meeting

### Good Practice - # Network and Operational Security Documentation and Management

Overall, a positive demonstration was witnessed in respect to the organisations intent and commitment in implementing, maintaining and continual improvement of the ISMS to ensure it remains well established and aligned to their intent and objectives, including statutory and regulatory requirements.

Next year visit booked remotely for 1 days on 17th March 2026 with James Stewart

It is important to remember that assessment work is based on sampling techniques and is time constrained. Even though a problem may not have been identified in an area of activity, this does not necessarily mean that no problems exist. Throughout the assessment, the BSI auditors were well supported, with free access to any information requested, which enabled the achievement of the agreed audit plan.

## Changes in the organization since last assessment

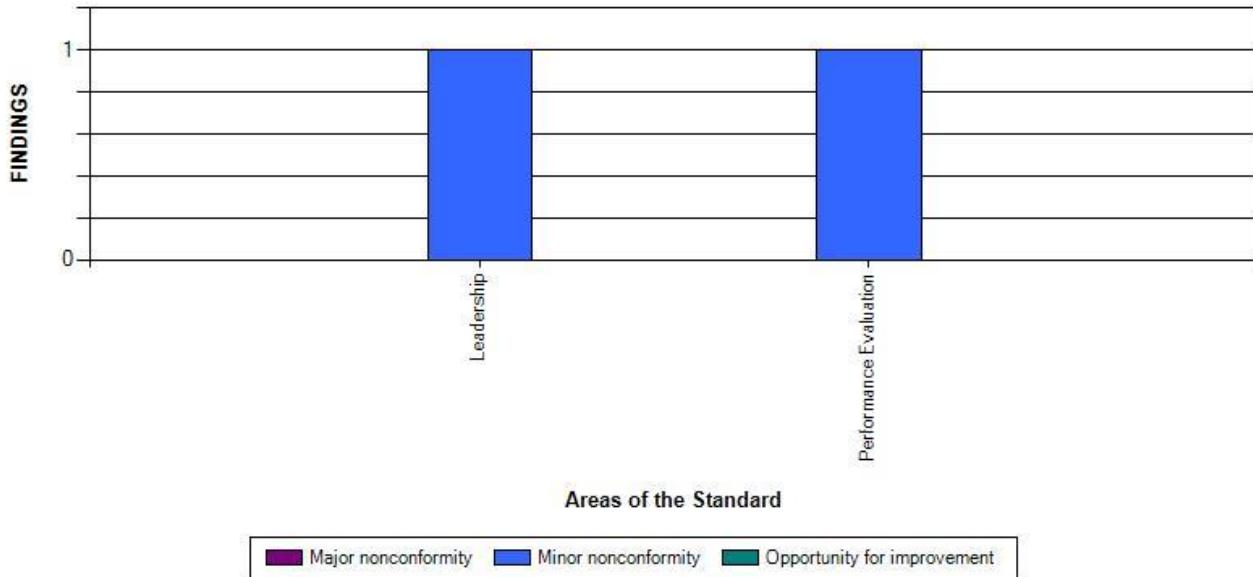
There is no significant change of the organization structure and key personnel involved in the audited management system.

No change in relation to the audited organization's activities, products or services covered by the scope of certification was identified.

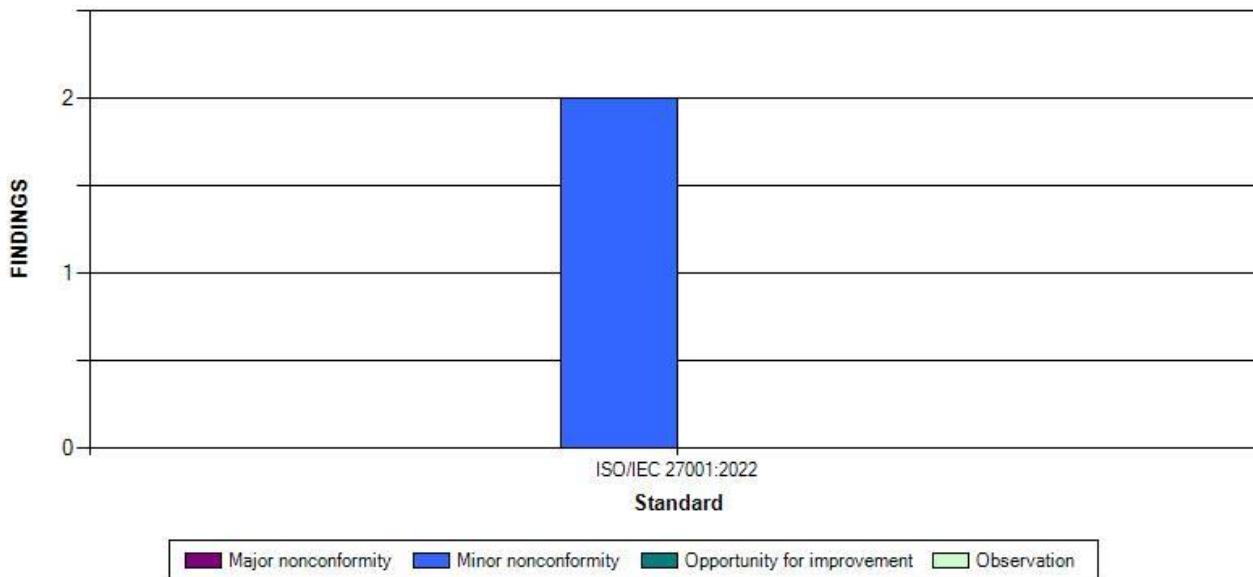
There was no change to the reference or normative documents which is related to the scope of certification.

## NCR summary graphs

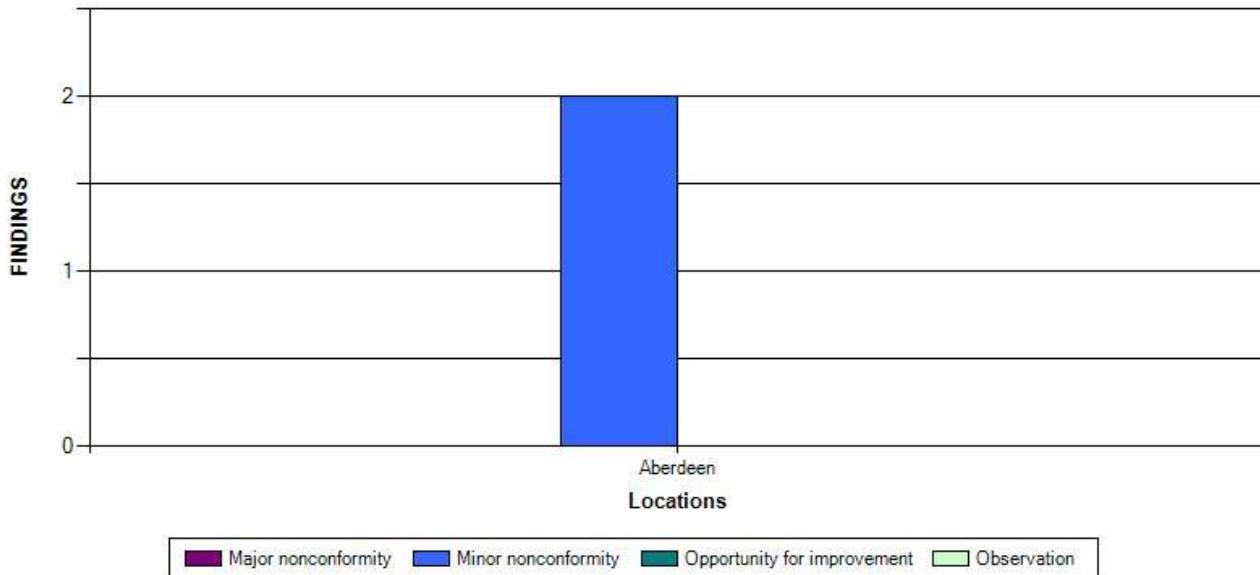
### Areas of the standard(s) where BSI recorded findings



### Which standard(s) BSI recorded findings against



## Where BSI recorded findings



## Your next steps

### NCR close out process

Corrective actions with respect to nonconformities raised at the last assessment have been reviewed and found to be effectively implemented.

2 minor nonconformities requiring attention were identified. These, along with other findings, are contained within subsequent sections of the report.

A minor nonconformity relates to a single identified lapse, which in itself would not indicate a breakdown in the management system's ability to effectively control the processes for which it was intended. It is necessary to investigate the underlying cause of any issue to determine corrective action. The proposed action will be reviewed for effective implementation at the next assessment.

Please refer to Assessment Conclusion and Recommendation section for the required submission and the defined timeline.

## Assessment objective, scope and criteria

The objective of the assessment was to conduct a reassessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organization's management system.

If this visit is part of a multi-location assessment, the final recommendation will be contingent on the findings from all assessments.

The scope of the assessment was defined in the plan provided in terms of locations and areas of the system and organization to be assessed.

The criteria of the assessment was ISO: 27001:2022 and Pisys Ltd's management system documentation.

## Statutory and regulatory requirements

Statutory and regulatory requirements including legislation were seen to have been reviewed and updated on a regular basis. This has been effective.(Refer Section - Legal, Regulatory and Contractual Compliance)

## Assessment participants

Name	Position	Opening meeting	Closing meeting	Interviewed (processes)
Peter Henderson	Director		X	X
Rowland Gault	Software Developer	X	X	X
Fiona Johnston	Contracts Manager			X
Akmal Muhammad	Software Developer - IT and Cloud Admin			X
Kyriaki Raizi- Cooke	Product Manager			X
Jim Emerson	Software Developer			X

## Assessment conclusion

BSI assessment team

Name	Position
Kalpeshkumar Patel	Team Leader

### Assessment conclusion and recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. The audit team concludes based on the results of this audit that the organization does fulfil the standards and audit criteria identified within the audit report and it is deemed that the management system continues to achieve its intended outcomes.

**RECOMMENDED - Corrective Action Plan Required ('Minor' findings only):** The audited organization may be recommended for certification / recertification / continued certification, based upon the acceptance of a satisfactory corrective action plan for all 'Minor' findings as shown in this report. Effective implementation of corrective actions will be verified during the next audit.

Please submit a plan through the BSI Connect Portal detailing the nonconformity, the root cause, correction and your proposed corrective action, with responsibilities and timescales allocated. **The plan is to be submitted no later than 11/04/2025.** If the corrective action plan is not received by this date, you may be putting your certification status at risk.

For any questions please contact your local BSI office, referencing the report number 3991942, 30121028.

### Use of certification documents, mark / logo or report

The use of the BSI certification documents, and mark / logo is effectively controlled.

## Findings from previous assessments

<b>Finding Reference</b>	2319113-202303-N1	<b>Certificate Reference</b>	IS 618522
<b>Certificate Standard</b>	ISO/IEC 27001:2013	<b>Clause</b>	6.2
<b>Location reference</b>	0047530525-000		
<b>Assessment Number</b>	3524643		
<b>Category</b>	Minor		
<b>Area/process:</b>	Planning		
<b>Details:</b>	The organisation has not determined how it plans to achieve its information security objectives.		
<b>Clause requirements</b>	<p>Information security objectives and planning to achieve them</p> <p>The organization shall establish information security objectives at relevant functions and levels.</p> <p>The information security objectives shall:</p> <ul style="list-style-type: none"><li>a) be consistent with the information security policy;</li><li>b) be measurable (if practicable);</li><li>c) take into account applicable information security requirements, and results from risk assessment and risk treatment;</li><li>d) be communicated; and</li><li>e) be updated as appropriate.</li></ul> <p>The organization shall retain documented information on the information security objectives.</p> <p>When planning how to achieve its information security objectives, the organization shall determine:</p> <ul style="list-style-type: none"><li>f) what will be done;</li><li>g) what resources will be required;</li><li>h) who will be responsible;</li><li>i) when it will be completed; and</li><li>j) how the results will be evaluated.</li></ul>		
<b>Objective Evidence:</b>	The organisations objectives are set at a high level. There was no evidence supplied during the audit that demonstrated that the organisation had determined how it was planning to meet its objectives as defined within ISO27001.		
<b>Cause</b>	Maturity and understanding of the requirements.		
<b>Correction/containment</b>	Objectives will be reviewed on a regular basis to ensure they align with defined performance metrics.		
<b>Corrective action</b>	Current objectives will be reviewed and updated with alignment to performance measures.		

Closed?	
Yes	
<b>Justification</b>	<p>04/03/24 JS</p> <p>* Information Security Policy V2.10: 1.2 How is this achieved. : new section added.</p> <p>* Whilst a descriptive paragraph has been added to the policy document, there is further work required to be able to close the finding. Two additional OFIs were raised at this finding around objectives and performance measurements. These will assist with progress towards closure of this finding. Planning to achieve the objectives is intended to create the required performance metrics.</p> <p>March 2025 KP - Objectives are listed in the Policy Documents in Section B.2.5 SMART objective with KPI, Delivery Methods, Annual / Monthly Targets</p> <p><b>After review from this assessment, corrective action is deemed effective and allows this non-conformance to be closed out.</b></p>

<b>Finding Reference</b>	2464758-202403-N1	<b>Certificate Reference</b>	IS 618522
<b>Certificate Standard</b>	ISO/IEC 27001:2013	<b>Clause</b>	A.18.1.3
<b>Location reference</b>	0047530525-000		
<b>Assessment Number</b>	3760692		
<b>Category</b>	Minor		
<b>Area/process:</b>	Compliance (A.18)		
<b>Details:</b>	Information retention periods did not look to be fully documented		
<b>Clause requirements</b>	Protection of records Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release, in accordance with legislative, regulatory, contractual and business requirements.		
<b>Objective Evidence:</b>	No evidence was available to illustrate documented retention periods.		
<b>Cause</b>	Maturity and understanding of the ISO Standard Requirements		
<b>Correction/containment</b>	Section A has been added to Data Retention Policy		
<b>Corrective action</b>	# Data Retention Policy updated on 6th March 2024 # Section A stated the Data Retention periods with appropriate retention periods for Accounting & Tax, Immigration Checks, HMRC Approval Documents, Backup, Contractual, CVs & Interview notes for unsuccessful job applications, Personal files and Training records etc.		

<b>Closed?</b>	
Yes	
<b>Justification</b>	29/01/25 JS: Not reviewed at this assessment, will be updated in March 2025 March 2025 KP - Data Retention Policy has been updated <b>After review from this assessment, corrective action is deemed effective and allows this non-conformance to be closed out.</b>

## Findings from this assessment

### Opening Meeting:

The opening meeting was conducted and arrangements for the assessment were confirmed with representative's present. This included confirmation of the visit plan, employee numbers in scope, confidentiality, H&S, BSI standard assessment approach (open questions, sampling, recording, non-conformity definition), and visit purchase order reference entered.

No significant complaints have been received by the business.

No Significant security incidents have occurred resulting in any regulatory or legal action being taken against the business.

### Business Update and Changes to the ISMS, Review of Previous Findings:

No significant changes in the Information Security Management System documentation, Organisation Structure / Key personnel and Product & Services

- Previous Non-conformities were effectively reviewed and closed during this audit.

### Organisational Context, Interested Parties, Scope, and ISMS Documentation:

#### Documented Information / Evidence

# Information Security Policy Rev 2.11 Dated 08/05/2024

## <https://www.pisys.co.uk>

#### Context of the Organisation

founder of the organisation having an experience to worked on survey boats in some of the most hostile environments on the planet, developing and commissioning mission- critical systems to support he emerges upstream energy sector. which put them in a unique position to assist companies who require effective high-tech solutions to complex problem in any industry.

#### Pisys 360 Integrated HSEQ Software

> Permit to Work - A cloud based system for creating and managing Permits to Work across any type of business or work site.

> Action Tracking - Create and assign actions, manage approval with complete visibility on action

**history**

- > Operations Training Simulator - Control Room Operator, Emergency Response, Stability, OIM Training
- MEM Training
- > ESG Reporting - Record and Manage Environment, Social and Governance Data Quickly and accurately

- **Context of the organisation** has categories in the PESTLE Manners which stated the Risks in all areas including the capacity management and governance

**Interested Parties & their expectations** are listed for clients, staff, suppliers (AWS, Microsoft, Dell etc), Regulatory bodies (ICO, HSEQ, Environmental), shareholders, competitors, neighbours, senior management

**Scope of Certification**

The systems, processes and infrastructure involved in delivering Pisys' range of software products and services in accordance with Statement of Applicability 1.0 Dated 18/12/2024

**ISMS Documentation** Structured the Manual, Process / policies and relevant records templates with the consideration of the legal, regulatory, including Climate change and contractual requirements, stored in the company SharePoint Section Information Security, Policies and Procedures, which are utilised by all business unit as and when needed.

Process Interaction chart demonstrate the information life cycle between PISYS, Customers Vendors and Regulatory bodies

**Climate Change** Issues has been considered, Stated the Risk to Data Centre and ISMS from environmental factors like Natural Disaster e.g. Energy Usage, Remote Working and Carbon Footprint monitoring. organisation has implemented the DR and BCP within the ISMS to protect / mitigate the Potential data loss and down time in case of environmental disasters.

**Conclusion**

Planned activities have been fully realised.

**Leadership and Commitment:****Organisational Control**

- 5.1 ISMS Policies,
- 5.2 ISMS Roles & Responsibilities
- 5.3 Segregation of duties
- 5.4 Management Responsibilities
- 5.5. Contact with Authorities
- 5.6 Contact with Special Interest Group
- 5.7 Threat Intelligence

**Documented Information / Evidence**

# Information Security Policy Rev 2.11 Dated 08/05/2024

**> Top Management Interview (PH- Company Director)**

A Leadership interview took place with PH- Company Director whose has demonstrate clear understanding

- Top Management demonstrate a clear commitment to information security, actively participating in the establishment, implementation, and maintenance of the ISMS.
- leadership ensures that the ISMS aligns with the Organisation's Strategic direction and business objectives, reinforcing a strong governance structure
- the organisation has implemented a framework for setting information security policies and objectives, providing a roadmap for the ISMS

#### **> ISMS & Other Policies,**

- # Information Security Statement Signed by PH - Company Director
- The ISMS Policy is well documented providing a clear and comprehensive framework for information security that is easily accessible to all relevant stakeholders.
- It is align with the organisation's overall objectives, ensuring that information security is an integral part of the business strategy e.g. Protecting the CIA, Unauthorised access to Pisys Information , Staff Awareness & Training
- The policy demonstrates a commitment to legal and regulatory compliance, outlining the organisation's responsibilities to adhere to application information security laws and standards
- The Information Security Statement has not demonstrate the methods of effective communicates aligns well with the ISO:27001:2022 standards **\*NCR Raised**

#### **> Roles and Responsibilities**

- the organisation has established a well-defined structure for managing information security responsibilities. the distribution of roles aligns with ISO:27001:2022 requirements ensuring accountability and promoting a culture of shared responsibilities for information security
- The organisation has implemented mechanisms for regular reviews and updates of roles and responsibilities to adapt to changes in the organisational structure and information security landscape
- Key Personal (Management, ISMS Team & Staff) Including the Information Security Officers and Data Owners demonstrate a clear understanding of their respective roles and actively contribute to the effectiveness of the ISMS

# ISMS Team Members Includes Director, Development Team Representative, Support Team Representative

#### **# 5.7 Threat Intelligence**

- Microsoft Health Scoring
- Microsoft Defender Installed on End User Devices
- Information Security and Access Control Review Meeting carried out Monthly
- Annual Penetration Test and Cyber Essential Certificate
- Firewall and Encryption to safe guard of sensitive data and prevent unauthorised access
- Weekly Team Meeting for Staff Awareness

# Email Notification received from Microsoft dated 22/03/2024 Stated the New Vulnerability Notification : PisysVulnerabilityNotificationRule - Vulnerability Name CVE-2025-2476 with High Severity, # Microsoft Defender Secure Score - 72.48%

#### Conclusion

Planned activities have not been realised - Non-conformance raised.

## **Planning & Operations:**

### **Documented Information / Evidence**

# Risk Assessment Process Revision 6 Dated 22/04/2024

## Risk Assessment & Treatment

Source of risk Identification - Introduction of New Assets , Product, Service Line and Teams

Key Document Review - Assets Register, SOA and Risk & Incident Register

Business Areas - Development, Support, Administration and Management

Risk Score = Likelihood x Impact (3 x 3 Matrix) - Low, Medium and High

Risk Treatment Options = Tolerate, Treat, Transfer or Terminate

### # Risk Register Template

> System ID	> Areas	> Due Date
> Outstanding On	> Risk description	> Date Created
> SOA Control Numbers	> Date Raised	> Response
> Project Name	> Date Completed	> Status
> Score Post Mitigation	> Action Description	> Priority

Total Number of Risk – 509, Open Risk - 4

Risk ID - 509 - Pisys DB1 data disk is exceeding IOPS investigate what's causing the High IOPS, Disk Might benefit from increased IOPS - 10/03/2025

Risk ID - 478 - Inadequate Consideration given to unsuccessful system logins- 09/09/2024

Risk ID 463 - Failure to review recommended actions on MS Secure Score - 10/06/2024

Risk ID 462 - Notification that base windows Intune policies have been deprecated - 10/06/2024

### Statement of Applicability Ver 1.0 dated 18/12/2024 contained the reason for inclusion, and

compliance Evidence

- > ISO Control Number
- > Control Description
- > Status of Applicability
- > Evidence Details

### ISMS Objectives & Planning for Changes

# Information Security Policy Rev 2.11 Dated 08/05/2024

### Strategic Direction of the ISMS

- > Protecting our system from Unauthorised Access
- > Ensuring that our system are always available for use
- > Ensuring that we are complying with all current legislations
- > Ensuring that Safety and comfort of our staff
- > Ensuring that we continue to be accountable to the standard enforced by our ISO 27001 Security Certification

### ISMS KPI

- > Completion of ISMS Awareness Programme - 85% - Monthly Monitoring
- > Completion of ISMS Audit Programme - 100% - Monthly Monitoring
- > O365 Defender Score - 15% better performance than similar sized company score - Monthly Monitoring
- > 99.5% Availability of Key System- Monthly Monitoring
- > 85% Resolutions of Penetration Test Risk Register Actions - Monthly Monitoring
- > 90% Management of ISMS Risk Register Actions

### Conclusion

Planned activities have been fully realised.

## Performance Evaluation & Improvement:

Documented Information / Evidence

### Objective / Performance Monitoring & Measurement

ISMS KPI are monitored on monthly basis

- > Completion of ISMS Awareness Programme - 85% - Achieved - 100%
- > Completion of ISMS Audit Programme - 100%
- > O365 Defender Score - 15% better performance than similar sized company score - Pisys Score 5.59 % / Industries Average Score 46.11%
- > 99.5% Availability of Key System - 99.995% (26 Mins down time in Since 2024)
- > 85% Resolutions of Penetration Test Risk Register Actions - Achieved 89%
- > 90% Management of ISMS Risk Register Actions - 4 Open Risk in the Risk Register - Not Achieved

**# Internal Audit** Schedule Contain the Clause 4 to 10 and SOA controls (Organisational, People, Physical and Technical)

IA Report - SOA control A.8.1 to 8.14

- IA Date -02/09/2024
- Internal Auditor - RG and KRC
- IA Scope - A8.1 to A8.14
- IA Findings - No Findings
- IA Score is 91.67%

IA Report - SOA Control A8.15 to A8.22

- IA Date - 07/10/2024
- Internal Auditor - RG and KRC
- IA Scope - A8.15 to A8.22
- IA Findings - No Audit Findings
- IA Score - 100%

IA Report - SOA Control A5.24 to A5.29

- IA Date - 15/05/2024
- Internal Auditor - RG and KRC
- IA Scope - A5.24 to A5.29
- IA Findings - No Audit Findings
- IA Score - 100%

### Management Review

it is evident that organisation has followed a set framework for evaluating and enhancing the effectiveness of its information security practices. The MRM Process demonstrating a commitment to continual improvement and a proactive approach to managing information security

The MRM conducted at planned interval (Annually) on dated 17/12/2024, ensuring a systematic and timely assessment of the ISMS. Top Management actively participates in the MRM, providing strategic insights and demonstrating a strong commitment to information security Governance. the MRM Process address key aspects, including performance evaluation, risk management, incident response and compliance with legal, regulatory and contractual requirements, However, Changes in the needs and expectation of the interested parties has not been reviewed in the annual MRM dated 17/12/2024 \* NCR Raised

Conclusion.

Planned activities have not been realised - Non-conformance raised.

## Nonconformity, Incident and Complaints, Corrective Action, and Continual Improvement:

- 5.24 Information security incident management planning and preparation
- 5.25 Assessment and decision on information security events
- 5.26 Response to information security incidents
- 5.27 Learning from information security incidents
- 5.28 Collection of evidence
- 6.8 Information security event reporting

### Documented Information / Evidence

# Dealing with Security Incident Procedure Rev 7.0 Dated 22/04/2024

Process- Preparation - Identification - Evidence, Containment, Eradication - Recovery and Lesson Learned

- Incidents are reported to senior management or designated email box "support@pisys.co.uk"
- Evidence may be obtained from support team members, helpdesk, server logs, development team etc.
- Forensic Evidence are retained in the secure manner and link with incident records in the action tracker
- Relevant parties are informed by the authorised personnel, subject to severity and impact

# Incident Log Template contained

- > System ID
- > Business Area
- > Date
- > Incident Description
- > Priority
- > Root Cause
- > Action Required
- > Response
- > Comment

Evidence

System ID - 508

Date - 17/02/2025

Due Date 04/04/2025

Business Area - Infrastructure

Incident - SQL Time Cut (MOC 2791 Dated 15/01/2025, Shift heavy ATMS DBs to DB2) - Management of change

Priority - Medium

Date of Action 24/03/2025

### Continual Improvement

Source - Management Review, Audit findings, Industry updates and employee feedback

# Last Meeting dated 17/12/2024 Feedback evidence the following OFI and Actions for continual improvement

- Continue to Raise profile of ISMS (Team Meeting -Security Moment)
- Considering of the risk as part of development and release cycle - Action recorded in the Risk Register
- Servers updates regularly test failover but consideration is to be given to scheduling occasional out-of-the-blue server failover test
- Monthly Information Security and Access Control Meeting dated 30/01/2025 Actions as below

Review of MS Secure Score, Defender and End Point Portal, Rack space, Asset Register, Network Protocols and Cyphers, ESET Alerts, User Access

Ongoing Tickets - # 467 - Cloud Recovery, # 478- unsuccessful Logins, # 479 - Email Quarantine, # 480 - Removable Media Policy

Added # 490 - Backup Risk

Added & Close out # 496 - Increasing in Phishing email using @pisys.co.uk email from: address

Conclusion

Planned activities have been fully realised.

## Resources; Physical and Environmental Security:

### Physical & Environmental Security

7.1 Physical security perimeters

7.2 Physical entry

7.3 Securing offices, rooms and facilities

7.4 Physical security monitoring - New

7.5 Protecting against physical and environmental threats

7.6 Working in secure areas

7.7 Clear desk and clear screen

7.8 Equipment siting and protection

7.9 Security of assets off-premises

7.10 Storage media

7.11 Supporting utilities

7.12 Cabling security

7.13 Equipment maintenance

7.14 Secure disposal or re-use of equipment

8.1 User endpoint devices

### Documented Information / Evidence

# Acceptable User Policy

# Remote Working Policy

Location - 7 Queen's Garden, Aberdeen AB15 4YD, United Kingdom

**Note-** This address is used for phone answering, Correspondence and team meeting purpose only, however currently organisation does not have and dedicated space on this location and all employees are working 100% remotely. Meeting rooms are available upon request, if needed.

- Network Infrastructure - Cloud Environment with Azure and AWS DC

- Spare IT Hardware are stored at the AM - Cloud Administrator's home address, which is authorised by the director

- Leavers assets are collected face to face meeting upon exit interview with relevant personnel  
Secure WEEE disposal certificate obtained from the service provider

- Employees are followed the clear desk / clear screen policy, acceptable user policy

Conclusion

Planned activities have been fully realised.

## Communication:

### Documented Information / Evidence

- # Communication Policy Rev 1 dated 10/04/2024
- # Incident Response Procedure
- # Employee Handbook Rev 17 Dated 02/09/2024 (Section 2.10.7 social media)

**Communication Process** effectively convey the significance of information security throughout the organisation. training programs are in place to enhance awareness and competence among employees, ensuring they understand their roles in maintaining information security, aligned with ISO:27001:2022 requirements.

### Key Elements

- Secure Electronic Communications
- Voice Communication
- Physical Communication
- Social Media and Online forums
- Training and Awareness
- Incident Response Reporting

### Competency, Awareness and Training

# Security Training Register Last Reviewed on dated 28/01/2025

Date	Training Description	Attended by
29/08/2024	SANS 2024 Cloud Sec Exchange	RAG, MAK and KRC
31/10/2024	Sensitive Data Logging	MAK, RAG, PM, BRS, ASH, GS, JEE
25/01/2024	ISC2 Certified in Cyber Security	KRC
28/01/2025	ISC2 Certified in Cyber Security	MAK
20/03/2025	Team Meeting to discuss the ongoing Security updates e.g. Fake Captcha, Amazon Kills, ISO Audits	

### Conclusion

Planned activities have been fully realised.

## Documented Information & Record Retention:

### Documented Information / Evidence

- # Information Classification Policy Rev 1.0 Dated 22/04/2024
- Information Classification Policy has considered the CIA requirements
- Level - Confidentiality - Integrity - Availability
- 0 - Public - Low- Low
- 1- Internal Use- Medium - Medium
- 2- Confidential - High - High

**ISMS Documentation** Structured the Manual, Process / policies and relevant records templates with the consideration of the legal, regulatory and contractual requirements, stored in the Company SharePoint with Doc ID, Number, Title, Rev Number and Dates. ISMS Change are addressed in each policy (Change Request, Review and Approval) between the Owner, Reviewer and Approval Author on Company SharePoint Site.

Type of change - Elective and Emergency

Frequency of Doc Review - Annual

- Acceptable Use of Information and Assets Policy
- Access Control Policy
- Assets Management Process
- Audit Procedure
- Business Continuity Plan
- Capacity Management Plan for Mission Critical System
- Clear Scree and Clear Desk Policy
- Communication Policy
- Cryptography Policy
- Data Backup Policy
- Data Breach Procedure
- Data Protection Policy for Hosted Services
- Data Retention Policy
- Dealing with Security Incident Procedures
- Disaster Recovery Policy for Data Centres
- Employees Handbook
- File Sharing Policy
- Information Classification Policy
- Information Security Policy
- IS Roles and Responsibilities Policy
- IT Leavers Procedures
- IT Security Policy
- Logging Policy
- Maintain and Improve the ISMS
- Management of change Policy
- Management of Removable Media Policy
- Management Review
- Outsourcing Policy
- PISYS Information Security Policy Summary
- PISYS Service Delivery Model
- PISYS Testing Team
- User Authentication Guideline
- Privacy and Protection of PII Policy
- Protection of Intellectual Property Rights Policy
- Remote Working Policy
- Risk Assessment Process
- Risk Treatment Process
- Secure Development Policy
- Server checks
- Supplier Security Policy
- Use of cloud Services Policy
- Use of Endpoint Device Security Policy
- Vendor Review
- Vulnerability Disclosure Policy
- Work Station Build Procedures

#### **# Data Retention** Policy Rev 1 Dated 06/03/2024

Section A stated the Data Retention periods with appropriate retention periods as below

Accounting & Tax - 3 Years

Immigration Checks - 2 Years

Expense Accounts - 6 Years

Wage and Salary Records - 6 Years

Annual Leave and Working Time Records - 2 years

National Insurance Returns - 3 Years

HMRC Approval Documents - Indefinite

Backup - as per Backup Policy

Contractual - Period as agreed

CVs & Interview notes for unsuccessful job applications - 6-12 Months

Personal files and Training records - 6 Years

Pensions - 12 Years

Conclusion

Planned activities have been fully realised.

## Human Resource (Screening & Background Checks):

- 5.4 Management responsibilities
- 6.1 Screening
- 6.2 Terms and conditions of employment
- 6.3 Information security awareness, education, and training
- 6.4 Disciplinary process
- 6.5 Responsibilities after termination or change of employment
- 6.6 Confidentiality or non-disclosure agreements
- 6.7 Remote Working
- 6.8 Information security event reporting

### Documented Information / Evidence

- # Acceptable User of Information Assets Rev 3.0 Dated 31/05/2024
- # Form 105 - Application Form
- # Form 106- Onboarding Checklist
- # Employment Contract
- # Employee Handbook
- # Procedure 021 - IT Leavers Procedures Rev 1.1 Dated 27/05/2023
- # Remote working Policy Rev 1 Dated 01/07/2024

- The Organisation implemented effective HR controls for managing the entire employment lifecycle including onboarding, changes in the roles and offboarding, ensuring a comprehensive approach to personnel security

#### Evidence

- HR Controls align cohesively with the organisation's business objectives underscoring a strategic integration of human resource practice into the broader information security framework.
- Intellectual Property Rights Policy Covers the Copyrights, Trademark, Patent, Trade Secret and Confidential Information
- Employee must follow the Acceptable Use of Information and Assets Policy
- Employee Hand Book,
  - > Appendix 1, Section 9.1 PISYS Disciplinary Procedure
  - > Section 2.10.6 Confidentiality
- ID Documents - Passport, Right To Work, Driving License
- Other Documents CV, P45 / P46, Education Certificate, Previous Work Experience, Personal References

### Induction Training

- Employment Guide
- Information Security Management - ISO 27001 System
- IT Asset Allocation
- Incident Reporting

# Remote Working Policy Stated the following

- > Remote Access Approval
- > Secure Remote Access
- > Security of Device, Network, Data Working Environment, Communication, Physical,
- > Incident Reporting
- > Awareness and Training
- > Employee Responsibilities for Remote Working

**IT Leavers** Checklist Contain the Responsibilities for the Office Manager and Technical support during the leavers event occurrence

Office Manager Ensure that PISYS IT Assets are returned / collected from the staff on the last working day and notify the Technical support team who are responsible for disable the network access, email forwarding and remove the user from bug system within 24 hours

### # Evidence

New Starters Employee - EM - Software Tester

Start Date - 17/02/2023

Police Scotland Check Ref # B01582192 Dated

UK Passport Ending with - 2753

Employment Contract - 07/04/2023

Regular Attendance in Weekly ISMS Awareness Meeting (Last dated 27th Feb 2025, 13th & 20th Mar 2025)

- Fake Captchas

- Amazon Kills on Device Alex Processing

Conclusion

Planned activities have been fully realised.

## Access Control:

5.15 Access control

5.16 Identity management

5.17 Authentication information

5.18 Access rights

8.2 Privileged access rights

8.3 Information access restriction

8.4 Access to source code

8.5 Secure authentication

8.18 Use of privileged utility programs

### Documented Information / Evidence

# Acceptable User of Information Assets Rev 3.0 Dated 31/05/2024

# Form 106- Onboarding Checklist

# Procedure 021 - IT Leavers Procedures Rev 1.1 Dated 27/05/2023

# Access Control Policy Rev 6 dated 12/04/2024

# Microsoft Entra Admin Centre (User Management)

Access Control Principle - Least Privileged, Separation of Duties, Access Control Mechanisms, Access Review and Access Removal

Access to Pisys Information Assets, Network, Application and Data, which are access by all Supporting Assets including all Endpoint devices e.g. laptops, mobile devices, servers, cloud based services, software's and physical premises, if any

- Access request must be raised by the user's managers and Information Security Officer with justification of valid reason

- Access Request approval (data Owners and IS Officer) based on the job roles and responsibilities with users identity and authentication

- Unique user credential, password and MFA

- Access review rights are regularly reviewed to reflect the changes in the system architecture and user's job roles

**IT Onboarding Checklist** include allocation of Work Email, User Credential Network Access (Bug system, AWS, RACKSPACE, ESET, Server Domain, IMD, VPN Certificate, Public Calendar), IT Assets Allocation, SharePoint Access, Office 365 Account

- Use of Secure VPN or other approved secure methods are mandatory to connect with PISYS Network
- Employees are responsible to protect their password, MFA (Microsoft Authenticator) and up to date antivirus, software firewall and security patches
- Office Manager Ensure that PISYS IT Assets are returned / collected from the staff on the last working day and notify the Technical support team who are responsible for disable the network access, email forwarding and remove the user from bug system within 24 hours

# User Access are recorded in the MS Entra Active Directory (22 User Account including Cloud Admin(2), Permit to Work, Pisys Support, Pisys Public, Mail@trackpipe.com

### **# Evidence**

EMP Name - EM

Start Date - 17/04/2023

Information Access - Work Email, PISYS Intranet, ISMS Policy and Procedure, Corporate Laptop Assigned

Last Login - 26/03/2025

Group Member Include following

> PisyswindowsDeviceCompliance

> PTW ProdUsers

>All Users,

> All Pisys Users

> ATMS DevUsers

>ATMProdControlPanelUsers

>ATMSProdUsers

>Developers

>Pisys

>PisysMFA

>PTWCCControlPanelUsers

User Type - Member, Since 11/04/2023

Software Installed / Access - 1 Password, Microsoft Office 365, Adobe, Dell Standard Applications, MS Copilot, MS Defender, MS Intune Extension

Access to Testing Environment

Ticket # MOC2831

Dated 12/02/2025

Description - Add Fiona and Lynda to order email distribution

Approved by JE - Cloud Admin

Priority - Normal

Type - Standard Task

Closed by 12/02/2025

Ticket # MOC 2825

Dated - 10/02/2025

Description - Create Admin User for JIM to Access ESET Portal

Approved by - AM

Priority - Normal

Type - Standard Task

Closed - 10/02/2025

**Conclusion**

Planned activities have been fully realised.

**Assets Management:**

- 5.9 Inventory of information and other associated assets
- 5.10 Acceptable use of information and other associated assets
- 5.11 Return of assets
- 5.12 Classification of information
- 5.13 Labelling of information
- 7.10 Storage media
- 8.9 Configuration management - New
- 8.10 Information deletion - New
- 8.11 Data masking - New
- 8.12 Data leakage prevention - New

**Documented Information / Evidence**

- # Asset Management Process Rev 1.5 Dated 27/05/2024
- # Work Station Build Procedure Rev 2.0 Dated 17/03/2025
- # Privacy Protection of PII Policy Rev 2.0 Dated 17/06/2024

Information Assets Classification - Desktop, Monitor, Laptop, Printer/ Printer Hardware, Network Hardware, Servers, Power Related Hardware, Information (Internal / External), Facilities, Documentation, and Personnel

- Laptops are BitLocker Encrypted
- All Devices are built with latest Windows Operating System, Protected with Windows Defender XDR and enrolled in the Entra ID.
- Data Bearing Devices are cleaned by using Bit Raiser before recycled / disposal
- Each Laptop has the Unique Device TAG, which is listed in the assets register
- Pisys Staff trained and trusted their knowledge about Information security, however no DLP control has been placed on the end user devices. but annual review is placed
- Access to USB on the end user devices are available upon Approved MOC Request, Currently all developers are authorised to transmit the data via USB Slots, Risk has been address in the ISMS Risk Register
- Very Limited PII Data has been managed by the Pisys, which require to Mask during the Processing, e.g. User Password, Financial, Client confidential and HR Data
- Secure VPN, TLS 1.2 and above are used to protect the DLP during the Transit in Production Environment / Pisys Cloud Infrastructure
- IaaS, PaaS, and SaaS Service Provider is responsible to protect the DLP along with their services e.g. Azure / AWS

**# Evidence**

- # Assets Register Content include, Title, Business Area, Assets Type, Specification, Tag No., Location, Status (Working/ Broken / Scrapped / Recycled), Comment, Purchase Date, Cost, Last PAT Test, Confidentiality, Integrity, Availability, Disposal Date, Disposal Destination, Disposal MOC
- Assets Register configured on the Company SharePoint Site
- # Total Laptops - 017 Working

Tag No. LAP028  
Employee- AM  
Device - Dell Precision 3530  
Mfg- Dell  
Purchase Date 11/11/2019  
Status - Working

Tag Number - LAP025  
Employee - JM  
Device - XPS15  
Mfg - Dell  
Purchase Date 28/03/2019  
Status - Working

TAG - LAP032  
Employee Name - EM - Software Tester  
Device - Vostro 7000Etid  
Mfg - Dell  
Purchase Date - 11/05/2021  
Status - Working

Tag LAP017  
Device - Latitude E6530  
Mfg - Dell  
Status - Disposed Dated 25/08/2021  
Destruction Doc - Donated to Charity with Servers (See MOC 1722) AMIC collected the item on 29/04/2023

Ticket # MOC 2880  
Dated 27/03/2025  
Description - Hess ATMS DB Delete (Demo Version)  
Priority - Normal  
Task - Standard  
Ticket Closed - 27/03/2025

Ticket # MOC2872  
Dated 12/03/2025  
Description - Delete Old DB Backups from DB1 and DB2  
Priority - Normal  
Task- Standard  
Ticket Closed - 12/03/2025

Conclusion  
Planned activities have been fully realised.

## IT Operational Security, Network Security, Cryptography: Encryption Key Management & Regulation:

- 5.14 Information transfer
- 5.37 Documented operating procedures

- 6.6 Confidentiality or non-disclosure agreements
- 8.6 Capacity management
- 8.7 Protection against malware
- 8.8 Management of Technical Vulnerability
- 8.13 Information backup
- 8.14 Redundancy of Information Processing Facilities
- 8.15 Logging
- 8.16 Monitoring activities - New
- 8.17 Clock synchronization
- 8.19 Installation of software on operational systems
- 8.20 Networks security
- 8.21 Security of network services
- 8.22 Segregation of networks
- 8.23 Web filtering - New
- 8.24 Use of cryptography
- 8.31 Separation of development, test, and production environments
- 8.32 Change management
- 8.34 Protection of information systems during audit testing

**Documented Information / Evidence**

# PISYS AWS Hosting Environment Rev 3 Dated 21/03/2025

- > Subnet and Network Routing
- > Access Control List
- > Security Groups
- > Load Balancers
- > TLS Security
- > Web Application Firewall
- > Endpoint Protection
- > Windows Firewall
- > Identity and Access Management
- > Data Encryption

# Pisys AWS Architecture Documented Diagram has segregated e.g. SG- Pisys LB, SG Apps, SG - DB, SG - DC and SG- Pisys- CVPN

# AWS Environment synchronised with AWS Cloud Watch

# **Clock Synchronisation** - Windows NTP

# Subnets are segregated public and private

# AWS VPN, Load Balancer, Amazon Router53, S3 Storage, VPC End Point, Amazon Cloud Watch, NAT Gateway, Router, Internet Gateway, AWS Inbuilt features are in use

# Two Private Database Server and Two Private Web Server, Two Load Balancer,

# Six Access Control List

- ACL-Pisys-Private DC - Active Directory Domain Controller
- ACL-Pisys-Private DB -Associated with DB Server
- ACL-Pisys-Private Apps - Associated with Web Server
- ACL-Pisys-Public- LB- Associated with Load Balancer
- ACL-Pisys-Public - NAT- Associated with NAT Subnet
- ACL-Pisys-Private- CVPN - Associated with CVPN Subnet

# AWS Client VPN Secure with 2048 RSA certificate and Encryption with AES256, Only Https traffic

allowed to App Servers and RDP & SSH Traffic to all servers with authenticated users through VPN  
# Microsoft SQL Server 2022 running in high configuration standards for availability, storage, CPU and log files  
# Five security groups serve as a stateful firewall for inside subnet resource  
# AD Authentication and authorisation process is placed to control remote access to servers for Pisys Staff connected to AWS VPN  
# TLS 1.2 and / or TLS 1.3 (ELB Security Policy - TLS13-1-2-Res-2021-06) secure all communication between web servers and browsers of whether sensitive data is being transmitted or not  
# Secure Development Practice and mitigate OWASP's top10 threat within the applications

### **# End Point Protection** includes

- Real-time file System protection from Virus and Malware
- Host intrusion prevention
- Advanced Memory Scanning to Protect from Obfuscated threats
- Exploit blocker to protect against exploits in applications
- Ransomware shield
- An intrusion detection system (IDS) provides network attack protection
- Botnet protection
- Web access protection
- Anti Phishing Protection
- Email client protection

### **Capacity and Event Log Management**

# Windows Servers 2022 OS installed with built in firewall enabled on all servers and configured  
# Pisys Staff are managed through Microsoft Entra ID Domain & Office365 Email address  
# AWS Servers access provided via 2048 -bit RSA Security certificate and server domain user account  
# Disks and AWS S3 Buckets are protected with AES256 encryption  
# Data Files (200GB) DB Logs (200GB) are stored in the AWS  
# Each Server has an encrypted 600GB disks to store database backups.  
# Alert Notification is placed upon usage of 90% of resources e.g. CPU, Memory, Storage  
# Server Events Logs are linked with AWS and cloud Watch, every 5 mins (90 days retention)  
# MS Defenders running on the End User Devices (NO Malware Remediated, 6% noncompliant, and Secure Score 72.48%, No. of Active Devices - 23)  
# Servers are protected with ESET End Point Protection - No Vulnerability Found - No. of Active Servers & Computers - 14, 1 Alerts for Outdated WinRAR Ver 7.1.0 (New Version 7.1.1) running on End User Device.

## Last Pen Test Date 17/01/2024,  
Scope - Web Application Security for ATMS (<https://atms.pisys.co.uk>),  
Conducted by AKIMBORCORE,  
Pen Test Findings - 6 Low and 2 Medium  
Current Status of findings - Closed (Refer Risk Register Actions - 542 to 552 and "YouTrack" Ref for Action Tracking)

### **## Web Filtering**

- All PISYS Work Stations managed through MS Intune, and Windows Defender  
- Blocked Category - Cults, Gambling, Nudity, Pornography/Sexually Explicit, Sex Education, Tasteless Violence, Child Abuse Images, Criminal Activity, Hacking, Hate & Intolerance, Illegal Drug, Illegal Software  
School Cheating, Self-Harm, Weapons

**## Data Backup** Policy Rev 5.0 Dated 18/10/2024

- Automated incremental backup for Production, Testing and DevOps Environments running every hours between 24/7 365
- 30 Days SLA with customer
- 60 Days SLA with Pisys
- Monthly Full Snapshots

Pisys retain data for the last 30days, enabling Points in time recovery. Admin will inform the staff members about customer offboarding by raising MOC Tickets

BCP Test Ticket - MOC 2819

Dated - 05/02/2025

Description - Grab a Copy of the audits DB from QC sites

Methods - DB1 Files Copied from DB and Installed in to Local SQL Server, Delete the Backup from server

Results - Successful

Down Time - no Downtime

Client Data backed up in the datacentre and replicated to backup sites

Backup integrity test undertaken by the IT support Staff

**## Change Management**

Ticket # MOC2749

Dated 18/11/2024

Description - Create Stanley Black & Decker PTW db - Trial

Priority - Normal

Completed - 18/11/2024

Ticket # MOC 2855

Dated 27/02/2025

Description - Delete Stanley Black & Decker PTW db - Trial

Priority - Normal

Completed 27/02/2025

**## Cryptographic** Policy Rev 1.6 dated 16/12/2024

Key Management - AWS, Azure DevOps, Server Certificate (SSL and DB Server Encryption )

Authentication - TLS Certificate

Protection - AWS Certificate Manager

Certificates are backed up on the Secure Web Servers

Validity - 1 Year

Ticket - MOC2523

Dated - 01/05/2024

Description - Issue a New \*.pisys.co.uk and update it on AWS Certificate Manager, IMD VPN and OTS Servers

Priority - Normal

Completed 02/04/2024

**Conclusion**

Planned activities have been fully realised.

**## Good Practice ##**

## Software / System Acquisition, Development and Maintenance & Project Management:

- 5.8 Information security in project management
- 8.25 Secure development life cycle
- 8.26 Application security requirements
- 8.27 Secure system architecture and engineering principles
- 8.28 Secure coding - New
- 8.29 Security testing in development and acceptance
- 8.30 Outsourced development
- 8.31 Separation of development, test and production environments
- 8.32 Change management
- 8.33 Test information

### Documented Information / Evidence

- # Secure Development Policy Rev 3 Dated 12/11/2024
- # OWASP Guide Ver 4.05
- # Microsoft Integrated Security into DevOps Processes (DevSecOps)
- # PISYS Testing Team (SOP), Rev 1.6 Dated

- Information Security Risk address at any point of the development lifecycle e.g. Design, Coding, Build, Deploy and run
- Zero Trust Architecture and Governance followed and every stage of SDLC
- Each User Account has granted the information access followed by Need to know and least privileged principle

Information Security Objective followed, specified by Microsoft

- > Established security standard, metrics and governance
- > Require use of proven security features languages and frameworks
- > Perform Security Design review and threat modelling
- > Define and use cryptographic standard
- > Secure the software supply chain
- > Secure the engineering environment
- > perform security testing
- > Ensure operational platform security
- > Implement security monitoring and response
- > Provide security training

Sprint Management - You Track Portal (Open, In-Progress, To Verify and Done / Passed)

Dedicated Channel on the You Track for Each Pisys Software Product

Coding Platform - MS Visual Studio and Visual Studio Code

# Developers are not allowed to ignore any Code Warning

# Second Opinions are obtained for the design and threat model

# Password Rotations is not mandate for user account, however regular rotation of the certificate is mandatory

# Static and Dynamic Analysis Security testing adopted

# Application Pen Test run annually e.g. Cyber Essential and External Pen Test

# Existing and Potential Security Issues are reviewed / discussed in the weekly team meeting

# Security moment shared via the shared blog post from Information security authorities

# Testing Documentation - SharePoint, YouTrack and Qase

# Testing Life Cycle - Requirement - Planning - Case Creation & Design - Execution and Cycle Closer  
# Type of Test - Automation & Manual  
# Test outcome logged and stored in the SharePoint with version control  
# Test Requirement Gathered and Defact Management - YouTrack  
# Test Case Management - Qcase  
# Automated Test Environment - Regression Testing using subset of Qase test cases & Robot Framework and Selenium

**Evidence**

# PTW V 1.6.3.10 - Patch Release Test Plan Rev1 Dated 16/12/2025

# PTW V 1.6.3.10 - Patch Release Rev1 Dated 15/01/2025

# PTW Ver 1.6.3.10 Patch Release - Release Note Rev 1.0 dated 15/01/2025

Scope of Dev, Testing, and Release of following Tickets for above version of the Software product - PTW (Permit to Work)

# 1701 - Isolation Status

# 1703 - Improvements of Isolation

# 1709 - Permit List - Validation Between Filter

# 1708 - A user without admin rights for any of the general permit or isolation items is unable to edit any contractor documents

# 1705 - long term isolation improvement

# 1701 - isolation "Live Only" Checkbox

# 1702 - Isolation Rejects

# Ticket - MOC2793 dated 15/01/2025 - Update PTW to V 1.6.3.10,

Priority - Normal

Type - Standard Task

Completed -15/01/2025 at 19:00

down Time - 15 Mins

- Technique Used - Blackbox Testing, Static Analysis, Data Injection (Positive & Negative), and Visual Inspection

- Test Deliverables - Test Script, Interval Progress Report, Release Test Report, Environmental Details, Detailed Software Test Tool Set, Regression Test Pack

- Test Conducted by - KRC and EM,

- Developer - GS

- Release between 16/12/2024 to 17/01/2025

- Objective Achieved

**Conclusion**

Planned activities have been fully realised.

**Supplier Security (Selection / Review / Monitoring / NDA):**

5.19 Information security in supplier relationships

5.20 Addressing information security within supplier agreements

5.21 Managing information security in the ICT supply chain

5.22 Monitoring, review and change management of supplier services

5.23 Information security for use of cloud services - New

6.6 Confidentiality or non-disclosure agreements

**Documented Information / Evidence**

# Supplier Security Policy Rev 1.2 Dated 18/10/2024

- Suppliers are reviewed and approved by the director in consultation relevant Team members
- Supplier Agreements are mandatory along with SLA, NDA, Intellectual Property Rights and Termination T&Cs
- Contract owner is responsible to monitor the supplier performance and proposed any required changes
- Cloud Service Supplier Assessment Criteria Includes VPC, Compute, Storage, IAM, DNS Security, Geographical Location, and Data Encryption
- All Suppliers are listed in the Company SharePoint
- Access rights are managed in accordance with Pisys Access Control Policy

**# Documented Information Retained**

- Supplier Contract
- Non Disclosure Agreement - Pisys Template Valid from 31/05/2024
- Supplier Performance Records

**Evidence - List of Current Suppliers**

- AWS
- BSI - <https://bsigroup.com/en-GB/about-bsi/compliance-and-ethics-in-bsi/>
- Dell
- Log me In
- Rackspace Technology
- Red Evolutions
- Microsoft Ireland
- Akimbo Core
- Google Cloud
- Twilio Ireland Ltd
- SAGE
- Shopify
- 3T Training
- Embarcadero - Contract DocuSign Envelop ID D9CD258DFFBB, Expire on dated 01/09/2025 (C++ Builder Professional Name User Support ESID PID 1032468, PO Number 12874 Dated 26/06/2024

**Conclusion**

Planned activities have been fully realised.

**Business Continuity Management / ICT Readiness:**

5.29 Information security during disruption

5.30 ICT readiness for business continuity - New

8.14 Redundancy of information processing facilities

**Documented Information / Evidence**

# Business Impact Analysis Rev 2.0 Dated 18/03/2025

# Business Continuity Plan Rev 1.5 Dated 12/06/2024

# Disaster Recovery Policy for Data Centre Rev 2.0 Dated 19/03/2025

Strategy - Prevention - Detection - Response and Recovery

Prevention - Risk Assessment, Training, Access Control, Regular Backup and Physical Security

Detection - System Monitoring, Incident Response Team and Reporting Procedure

Response - Activation of the IRT, Containment, Eradication, Recovery and Post Incident Review

Recovery - BCP, DRP, Testing and Exercise, Vendor Management and Insurance

RTO- Restore Operation within 2 Hrs during the normal office time between Mon - Fri 09:00 to 17:30 UK time

BCP Includes Incident Occurrence - First Hr Strategy - Incident Response Team - Critical System - Recovery - Data Backup - Recovery Objectives and Alternative Communication

BCP Commitment for Employee Awareness, regular review of BCP, Generic Response to DR, Emergency Contract, and ensure the information security during DR situation

BCP Responsibilities are assigned to Information Security Manager, Employees, Contractors, Vendors and Overall Day to Day Task

Key Business Function - Development, Finance, InfoSec, IT, People, Quality, Sales and Support

Info Assets - Client Data, Contracts, People, PO, System Spec, Source Code, System Documentation, Supplier Invoice, Marketing Materials, Phone / 1-1 Conversation, Account Info, SharePoint Site , Test Plan, Run cases

Impact area - Financial, Legal and Reputation

BCP Risk - Physical Damage, system Breakdown, Access Restriction Physical & Logical, Utility Outage, Supply chain interruption, Damage to loss or corruption of IT

### **# Evidence**

Currently 100% Remote Working in PISYS

BCP Test Ticket - MOC 2871

Dated 12/03/2025

Description - Copy Anasuria ATMS database to MAK Dev Machine to investigate visibility issues

Methods - Login to DB1 and restore backup files to MAKs Dev Machine

Results - successful

Down time - No Downtime

BCP Test Ticket - MOC 2755

Dated 25/11/2024

Description - Restore CLEAN Linen Services Backup to QC

Methods - follow Wizard at <http://qcp.pisys.co.uk/PTW/>

Results - successful

Down time - No Downtime

Conclusion

Planned activities have been fully realised.

### **Legal / Regulatory / Contractual Compliance:**

5.31 Legal, statutory, regulatory, and contractual requirements

5.32 Intellectual property rights

5.33 Protection of records

5.34 Privacy and protection of PII

5.35 Independent review of information security

5.36 Compliance with policies, rules, and standards for information security

8.8 Management of technical vulnerabilities

### **Documented Information / Evidence**

# Privacy Protection of PII Policy Rev 2.0 Dated 17/06/2024

# Data Retention Policy Rev 1 Dated 06/03/2024

# Information Security Policy Section C.2. Legal regulatory and Contractual Compliance

# Protection of Intellectual Property Rights Policy Rev 1.0 Dated 07/06/2024

- Intellectual Property Rights and Non Disclosures are address in the Relevant Contractual documents e.g. Supplier, Employees and Customers
- Sensitive and PII Data Records are retained and protected with standard encryption provided by the relevant service provider and in accordance with the data retention policy & Privacy Protection of PII Policy
- Source of Legislative Updates - Industry Forum, Workshop's, [www.legislation.gov.uk](http://www.legislation.gov.uk) and Direct Contact between the director and authorities
- Intellectual Property Rights Policy Covers the Copyrights, Trademark, Patent, Trade Secret and Confidential Information

### **# Evidence**

- The Data Protection Act 2018
- Copyright, Design and Patents Act 1988
- Computer Misuse Act 1990
- Regulation of Investigatory Power Act 2000
- Human Rights Act 1998
- Electronics Communications Act 2000
- The Copyrights and rights in Database Regulations 1997
- Requirements of Writing (Scotland) Act 1995
- The Electronics Documents (Scotland) Regulations 2014
- GDPR 2018
- The Intellectual Property Rights 2014
- WEEE Directive 2012 /19/EU
- Modern Slavery Act 2015

# Employment Contract Template Section

### **Cyber Essential**

Organisation - Pisys Limited

Scope - Whole Organisation

Profile Version - 3.1 Montpellier

Certificate Number - e8621ff1-d07c-4c48-a237-39748974a038

Certificate Date 27/02/2025

Re-Certificate Date - 27/02/2026

**ICO Registration** reference: Z5787765

Date registered: 20 September 2001

Registration expires: 19 September 2025

Payment tier: Tier 1

Data controller: Pisys Limited

Address: 7 Queen's Gardens, Aberdeen - AB15 4YD

**Last Pen Test** Date 17/01/2024,

Scope - Web Application Security for ATMS (<https://atms.pisys.co.uk>),

Conducted by AKIMBORCORE,

Pen Test Findings - 6 Low and 2 Medium

Current Status of findings - Closed (Refer Risk Register Actions - 542 to 552 and "YouTrack" Ref for Action Tracking)

Conclusion

Planned activities have been fully realised.

## Competency, Awareness and Training (Staff Interview):

### Documented Information / Evidence

- The Organisation demonstrate a clear understanding of the significance of employee awareness and education, as evidence by the information security awareness programs and regular training sessions.

### Induction Training

- Employment Guide
- Information Security Management - ISO 27001 System
- IT Asset Allocation
- Incident Reporting

**# Remote Working Policy** Stated the following

- > Remote Access Approval
- > Secure Remote Access
- > Security of Device, Network, Data Working Environment, Communication, Physical,
- > Incident Reporting
- > Awareness and Training
- > Employee Responsibilities for Remote Working

# Regular Attendance in Weekly ISMS Awareness Meeting (Last dated 27th Feb 2025, 13th & 20th Mar 2025)

- Fake Captchas
- Amazon Kills on Device Alex Processing

### Emp Name - KRC - Product Manager

- Join Pisys as QA Tester
- Internal and External Engagement via Email, Teams
- Weekly Product Meeting
- Security Risk for Test Data base needs to sanitised and cleaned
- Phishing email awareness demonstrated with observation of sender's email address, body part, signature panel
- Data sensation skills use as necessary
- No Testing Data Retention
- Test Cases are stored in the Qcase
- Test notes and release notes are stored in the Company SharePoint
- Password Change Every 90 days (12 Characters Length with Lower, upper, Numbers and Special Characters)

- Information Security Policy were shared onscreen

**Emp Name - JE - Software Developer**

- Internal Engagement
- Tools Use- You Track - Sprint Management
- Code Writing - Java Script, SQL Servers and Local Machine
- Code Review related Risk has been considered during merging, QA and Release process, if any
- Phishing email awareness demonstrated with observation of sender's email address, body part, signature panel
- Password Change Every 90 days (12 Characters Length with Lower, upper, Numbers and Special Characters)
- Information Security Policy were shared onscreen

**Conclusion**

Planned activities have been fully realised.

**Closing Meeting:**

The closing meeting was conducted, and the report findings summarised to those present. The BSI standard assessment approach including confidentiality, nature of sampling, appeals process (if required), and any forward actions following this assessment were confirmed. The next visit planning arrangements were reviewed and confirmed

## Minor (2) nonconformities arising from this assessment.

<b>Finding Reference</b>	2630475-202503-N1	<b>Certificate Reference</b>	IS 618522
<b>Certificate Standard</b>	ISO/IEC 27001:2013	<b>Clause</b>	5.2
<b>Location reference</b>	0047530525-000		
<b>Assessment Number</b>	3991942		
<b>Category</b>	Minor		
<b>Area/process:</b>	Leadership and Commitment		
<b>Statement of non-conformance:</b>	Organisation has not demonstrated the methods of communication within Information Security Policy Statement		
<b>Clause requirements</b>	Policy Top management shall establish an information security policy that: f) be communicated within the organization; and g) be available to interested parties, as appropriate.		
<b>Objective Evidence</b>	Information Security Policy Statement		
<b>Cause</b>			
<b>Correction/containment</b>			
<b>Corrective action</b>			

<b>Finding Reference</b>	2630475-202503-N2	<b>Certificate Reference</b>	IS 618522
<b>Certificate Standard</b>	ISO/IEC 27001:2013	<b>Clause</b>	2022_9.3.2
<b>Location reference</b>	0047530525-000		
<b>Assessment Number</b>	3991942		
<b>Category</b>	Minor		
<b>Area/process:</b>	Performance Evaluation & Improvement		
<b>Statement of non-conformance:</b>	Changes in the needs and expectations of interested parties has not been reviewed in the ISMS Management Review Meeting		
<b>Clause requirements</b>	Management review inputs The management review shall include consideration of:		

	b) changes in external and internal issues that are relevant to the information security management system;
<b>Objective Evidence</b>	Annual Management Review Minutes Dated 17/12/2024
<b>Cause</b>	
<b>Correction/containment</b>	
<b>Corrective action</b>	

## Next visit objectives, scope and criteria

The objective of the assessment is to conduct a surveillance assessment and look for positive evidence to verify that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system; that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives as applicable with regard to the scope of the management standard; to confirm the ongoing achievement and applicability of the forward strategic plan.

The scope of the assessment is defined in the plan provided in terms of locations and areas of the system and organization to be assessed.

The criteria of the assessment was ISO: 27001:2022 and Pisys Ltd's management system documentation.

Please note that BSI reserves the right to apply a charge equivalent to the full daily rate for cancellation of the visit by the organization within 30 days of an agreed visit date. It is a condition of registration that a deputy management representative be nominated. It is expected that the deputy would stand in should the management representative find themselves unavailable to attend an agreed visit within 30 days of its conduct.

## Next visit plan

<b>Date</b>	<b>Auditor</b>	<b>Time</b>	<b>Area/process</b>
			CAV1
17/03/2026	James Stewart	09:00	Opening Meeting Introduction, attendees, programme, visit criteria, scope, confidentiality, methodology, sampling, limitations, findings, H&S, issues, plan, Q&A.
		09:15	Business update and Review of the ISMS
		09:30	Context and Policy (4,5) : Change/Update, Leadership, Roles/Responsibilities, Context/Scope, Core policy Changes to Org Context, Needs / expectations of interested parties, Scope Statement validation, Management System Policies/Processes, Roles Responsibilities & Authorities
		10:00	Leadership & Commitment (5) Leadership Interview
		10:30	Planning and Operations (6,8) : SOA, Risk Assessment/Treatment, Objectives, Change
		11:00	Evaluation and Improvement (9,10) : Internal Audit, Corrective Actions, Performance, Management Review, Improvement
		11:30	Organisational: information assets (A.5.9 - 5.14)
		12:00	Lunch & Report Writing
		13:00	Organisational: information security incident management (A.6.8, 5.24 - 5.28)
		13:30	Technological: use of cryptography (A.8.24)
		14:00	Technological: information deletion, masking & data loss prevention (DLP) (A.8.10 - 8.12)
		14:30	Technological: networks incl segregation, web filtering & redundancy (A.8.20 - 8.23, 8.14)
		15:00	Daily Review & Updates
			Closing Meeting
		15:30	Report Writing & Audit Trails

## Appendix: Your certification structure & ongoing assessment programme

### Scope of certification

#### IS 618522 (ISO/IEC 27001:2022)

The systems, processes and infrastructure involved in delivering Pisys' range of software products and services in accordance with Statement of Applicability 1.0 Dated 01/03/2025

### Assessed location(s)

The audit has been performed at Central Office.

#### Aberdeen / IS 618522 (ISO/IEC 27001:2013)

<b>Location reference</b>	<b>0047530525-000</b>
<b>Address</b>	Pisys Ltd 7 Queen's Gardens, Aberdeen AB15 4YD United Kingdom
<b>Visit type</b>	Re-certification Audit (RA Opt 2)
<b>Assessment number</b>	3991942
<b>Assessment dates</b>	24/03/2025
<b>Deviation from audit plan</b>	No
<b>Total number persons within scope of certification across ALL locations</b>	15
<b>Total number of persons within scope of certification at THIS location</b>	15
<b>Scope of activities at the site</b>	The systems, processes and infrastructure involved in delivering Pisys' range of software products and services in accordance with Statement of Applicability 1.0 Dated 18/12/2024
<b>Assessment duration</b>	3 day(s)

**Aberdeen / IS 618522 (ISO/IEC 27001:2022)**

<b>Location reference</b>	<b>0047530525-000</b>
<b>Address</b>	Pisys Ltd 7 Queen's Gardens Aberdeen AB15 4YD United Kingdom
<b>Visit type</b>	Transition Audit
<b>Assessment number</b>	30121028
<b>Assessment dates</b>	27/03/2025
<b>Deviation from audit plan</b>	No
<b>Total number persons within scope of certification across ALL locations</b>	15
<b>Total number of persons within scope of certification at THIS location</b>	15
<b>Scope of activities at the site</b>	The systems, processes and infrastructure involved in delivering Pisys' range of software products and services in accordance with Statement of Applicability 1.0 Dated 18/12/2024
<b>Assessment duration</b>	1 day(s)

## Certification assessment programme

**Certificate number - IS 618522**  
**Location reference - 0047530525-000**

		<b>Audit 1</b>	<b>Audit 2</b>	<b>Audit 3</b>	<b>Audit 4</b>	<b>Audit 5</b>	<b>Audit 6</b>	<b>Audit 7</b>
<b>Business area/location</b>	<b>Date (mm/yy):</b>	01/25	03/25	03/25	03/26	01/27	01/28	03/28
	<b>Duration (days):</b>	1	3	1	1	2	0.5	3
RR		X						
PM		X					X	
TR				X				
CAV					X	X		
RAV			X					X
Opening Meeting Introduction, attendees, programme, visit criteria, scope, confidentiality, methodology, sampling, limitations, findings, H&S, issues, plan, Q&A.		X	X	X	X	X		X
Business update and Review of the ISMS			X		X	X		X
Context and Policy (4,5) : Change/Update, Leadership, Roles/Responsibilities, Context/Scope, Core policy Changes to Org Context, Needs / expectations of interested parties, Scope Statement validation, Management System Policies/Processes, Roles Responsibilities & Authorities			X		X	X		X
Leadership & Commitment (5) Leadership Interview			X		X	X		X
Planning and Operations (6,8) : SOA, Risk Assessment/Treatment, Objectives, Change			X		X	X		X
Evaluation and Improvement (9,10) : Internal Audit, Corrective Actions, Performance, Management Review, Improvement			X		X	X		X
Support (7) : Resources, Competency, Awareness, Communications,			X			X		X

Document Management							
.							
Organisational: policies, responsibilities, contacts, threat intelligence (A.5.1 - 5.7)		X	X				X
Organisational: information assets (A.5.9 - 5.14)		X		X			X
Organisational: suppliers including use of cloud services (A.5.19 - 5.23)		X			X		X
Organisational: information security incident management (A.6.8, 5.24 - 5.28)		X		X			X
Organisational: legal, statutory, regulatory requirements, data privacy, review (A.5.31 - 5.36)		X			X		X
Organisational: information security during disruption including ICT readiness (A.5.29, 5.30)		X					X
People: starters & leavers, awareness training incl. remote working (A.6.1 - 6.7)		X			X		X
Physical: perimeter, facilities, monitoring, protection, cabling, maintenance (A.7.1-7.8, 7.11-7.13)		X					X
Technological: operational procedures & management (A.5.37, 8.6, 8.17, 8.18)		X			X		X
Technological: IT asset management (A.8.1, 7.9, 7.10, 7.14)		X	X		X		X
Technological: use of cryptography (A.8.24)		X		X			X
Technological: identity & access management (IAM) (A.5.15 - 5.18, 8.2 - 8.5)		X			X		X
Technological: anti-malware protection & vulnerability management (A.8.7, 8.8)		X			X		X
Technological: information deletion, masking & data loss prevention (DLP) (A.8.10 - 8.12)		X		X			X
Technological: information backup & test restores (A.8.13)		X			X		X

Technological: logging & monitoring incl. security information event management (SIEM) (A.8.15, 8.16)		X			X		X
Technological: networks incl segregation, web filtering & redundancy (A.8.20 - 8.23, 8.14)		X		X			X
Technological: secure development - requirements, design, coding & testing (A.8.25- 8.34)		X			X		X
Technological: IS in project management, change & configuration management (A.5.8, 8.32, 8.9, 8.19)		X			X		X
Business Function sample: Operations/Awareness [4-10, A.X]							
Local ISMS controls and Processes (9.2, 8.2, A.5.29-30, A.5.24-28, A.5.9-14)							
Lunch & Report Writing	X	X	X	X	X	X	
Report Writing & Audit Trails	X	X	X	X	X	X	
Daily Review & Updates	X	X	X	X	X	X	
Closing Meeting	X	X	X	X	X	X	

## Mandatory requirements – recertification

Review of assessment finding regarding conformity, effectiveness and relevance of the management system:

The organization has shown a positive approach to improving the ISMS. However, two minor NCRs were identified during the assessment. Root cause analysis and corrective actions will be provided within the agreed timeframe

Management system strategy and objectives:

During the assessment, top leadership showed a positive approach by providing strategic direction and committing to legal, regulatory, and contractual SLAs, along with technical and training resources provisioning

Review of progress in relation to the organization's objectives:

Software developers monitor ISMS objectives and review them with senior leadership every month.

Review of assessment progress and the recertification plan:

The three-year plan was reviewed during this audit to ensure it fits the number of employees and meets the scheme's requirements.

BSI client management impartiality and surveillance strategy:

Auditor does have all P, T and S Codes as require over the Certification Cycle and impartiality has been maintained in accordance with BSI Processes and procedures.

Continue with the current total assessment days/cycle.

## Expected outcomes for accredited certification

### What accredited management system certification means?

To achieve an organization's objectives related to the Expected Outcomes intended by the management systems standard, the accredited management system certification is expected to provide confidence that the organization has a management system that conforms to the applicable requirements of the specific ISO standard.

In particular, it is to be expected that the organization

- has a system which is appropriate for its organizational context and certification scope, a defined policy appropriate for the intent of the specific management system standard and to the nature, scale and impacts of its activities, products and services over their lifecycles, is addressing risks and opportunities associated with its context and objectives;
- analyses and understands customer needs and expectations, as well as the relevant statutory and regulatory requirements related to its products, processes and services;
- ensures that product, process and service characteristics have been specified in order to meet customer and applicable statutory/regulatory requirements;
- has determined and is managing the processes needed to achieve the Expected Outcomes intended by the management system standard;
- has ensured the availability of resources necessary to support the operation and monitoring of these products, processes and services;
- monitors and controls the defined product process and service characteristics;
- aims to prevent nonconformities, and has systematic improvement processes in place including the addressing of complaints from interested parties;
- has implemented an effective internal audit and management review process;
- is monitoring, measuring, analysing, evaluating and improving the effectiveness of its management system and has implemented processes for communicating internally, as well as responding to and communicating with interested external parties.

### What accredited management systems certification does not mean?

It is important to recognize that management system standards define requirements for an organization's management system, and not the specific performance criteria that are to be achieved (such as product or service standards, environmental performance criteria etc).

Accredited management systems certification should provide confidence in the organization's ability to meet its objectives related to the intent of the management system standard. A management systems audit is not a full legal compliance audit and does not necessarily ensure ethical behaviour or that the organization will always achieve 100% conformity and legal compliance, though this should of course be a permanent goal.

Within its scope of certification, accredited management systems certification does not imply or ensure, for example:

- that the organization is providing a superior product and service, or
- that the organization's product and service itself is certified as meeting the requirements of an ISO (or any other) standard or specification.

## Definitions of findings:

Nonconformity:

Non-fulfilment of a requirement.

Major nonconformity:

Nonconformity that affects the capability of the management system to achieve the intended results.

Nonconformities could be classified as major in the following circumstances:

- If there is a significant doubt that effective process control is in place, or that products or services will meet specified requirements;
- A number of minor nonconformities associated with the same requirement or issue could demonstrate a systemic failure and thus constitute a major nonconformity.

Minor nonconformity:

Nonconformity that does not affect the capability of the management system to achieve the intended results.

Opportunity for improvement:

It is a statement of fact made by an assessor during an assessment, and substantiated by objective evidence, referring to a weakness or potential deficiency in a management system which if not improved may lead to nonconformity in the future. We may provide generic information about industrial best practices, but no specific solution shall be provided as a part of an opportunity for improvement.

## How to contact BSI

Visit the BSI Connect Portal, our web-based self-service tool to access all your BSI assessment and testing data at a time that's convenient to you. View future audit schedules, submit your corrective action plans and download your reports and Mark of Trust logos to promote your achievement. Plus, you can benchmark your performance using our dashboards to help with your continual improvement journey.

Should you wish to speak with BSI in relation to your certification, please contact your local BSI office – contact details available from the BSI website:

<https://www.bsigroup.com/en-GB/UK-office-locations/>

## Notes

*This report and related documents are prepared for and only for BSI's client and for no other purpose. As such, BSI does not accept or assume any responsibility (legal or otherwise) or accept any liability for*

*or in connection with any other purpose for which the Report may be used, or to any other person to whom the Report is shown or into whose hands it may come, and no other persons shall be entitled to rely on the Report. If you wish to distribute copies of this report external to your organization, then all pages must be included.*

*BSI, its staff and agents shall keep confidential all information relating to your organization and shall not disclose any such information to any third party, except that in the public domain or required by law or relevant accreditation bodies. BSI staff, agents and accreditation bodies have signed individual confidentiality undertakings and will only receive confidential information on a 'need to know' basis.*

*This audit was conducted through document reviews, interviews and observation of activities. The audit method used was based on sampling the organization's activities and it was aimed to evaluate the fulfilment of the audited requirements of the relevant management system standard or other normative document and confirm the conformity and effectiveness of the management system and its continued relevance and applicability for the scope of certification.*

*As this audit was based on a sample of the organization's activities, the findings reported do not imply to include all issues within the system.*

## **Regulatory compliance**

*BSI conditions of contract for this visit require that BSI be informed of all relevant regulatory non-compliance or incidents that require notification to any regulatory authority. Acceptance of this report by the client signifies that all such issues have been disclosed as part of the assessment process and agreement that any such non-compliance or incidents occurring after this visit will be notified to the BSI client manager as soon as practical after the event.*