

National Distribution Centre Unit 10, Kites Croft Business Park, Fareham, Hampshire, PO14 4LW

Access Control Policy

Overview

Passwords are an important aspect of computer security. A poorly chosen password may result in unauthorized access and/or exploitation of SMI Group's resources. All users, including contractors and vendors with access to SMI Group systems, are responsible for taking the appropriate steps, as outlined below, to select and secure their passwords.

Purpose

The purpose of this policy is to establish a standard for creation of strong passwords, the protection of those passwords, and the frequency of change.

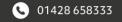
Scope

The scope of this policy includes all personnel who have or are responsible for an account (or any form of access that supports or requires a password) on any system that resides at any SMI Group facility, has access to the SMI Group network, or stores any non-public SMI Group information.

Policy:

General

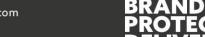
- All system-level passwords (e.g., root, enable, Windows Administrator, application administration accounts, etc.) must be changed on at least a quarterly basis.
- All production system-level passwords must be part of the InfoSec administered global password management database.
- All user-level passwords (e.g., email, web, desktop computer, etc.) must be changed at least every six months.
- User accounts that have system-level privileges granted through group memberships or programs such as "sudo" must have a unique password from all other accounts held by that user.
- Where SNMP is used, the community strings must be defined as something other than the standard defaults of "public," "private" and "system" and must be different from the passwords used to log in interactively. A keyed hash must be used where available (e.g., SNMPv2).
- All user-level and system-level passwords must conform to the guidelines described below.













Head Office

Vision House, Bedford Road, Petersfield, Hampshire, **GU323QB**

National Distribution Centre Unit 10, Kites Croft Business Park, Fareham, Hampshire, PO14 4LW

Guidelines:

General Password Construction Guidelines

All users at SMI Group should be aware of how to select strong passwords.

Strong passwords have the following characteristics:

- Contain at least three of the five following character classes:
- 1. Lower case characters
- 2. Upper case characters
- 3. Numbers
- 4. Punctuation
- 5. "Special" characters (e.g. @#\$%^&*()_+|~-=\`{}[]:";'<>/ etc)
- Contain at least fifteen alphanumeric characters.

Weak passwords have the following characteristics:

- 1. The password contains less than fifteen characters
- 2. The password is a word found in a dictionary (English or foreign)
- 3. The password is a common usage word such as:
- Names of family, pets, friends, co-workers, fantasy characters, etc.
- Computer terms and names, commands, sites, companies, hardware, software.
- The words "SMI Group", "sanjose", "sanfran" or any derivation.
- Birthdays and other personal information such as addresses and phone numbers.
- Word or number patterns like aaabbb, qwerty, zyxwvuts, 123321, etc.
- Any of the above spelled backwards.
- Any of the above preceded or followed by a digit (e.g., secret1, 1secret)

Try to create passwords that can be easily remembered. One way to do this is create a password based on a song title, affirmation, or other phrase. For example, the phrase might be: "This May Be One Way To Remember" and the password could be: "TmB1w2R!" or "Tmb1W>r~" or some other variation.

(NOTE: Do not use either of these examples as passwords!)

Password Protection Standards

 Always use different passwords for SMI Group accounts from other non-SMI Group access (e.g., personal ISP account, option trading, benefits, etc.).











National Distribution Centre Unit 10, Kites Croft Business Park, Fareham, Hampshire, PO14 4LW

- Always use different passwords for various SMI Group access needs whenever possible. For example, select one password for systems that use directory services (i.e. LDAP, Active Directory, etc.) for authentication and another for locally authenticated access.
- Do not share SMI Group passwords with anyone, including administrative assistants or secretaries. All passwords are to be treated as sensitive, confidential SMI Group information.
- Passwords should never be written down or stored on-line without encryption.
- Do not reveal a password in email, chat, or other electronic communication.
- Do not speak about a password in front of others.
- Do not hint at the format of a password (e.g., "my family name")
- Do not reveal a password on questionnaires or security forms
- If someone demands a password, refer them to this document and direct them to the Information Security Department.
- Always decline the use of the "Remember Password" feature of applications (e.g., Eudora, OutLook, Netscape Messenger).

If an account or password compromise is suspected, report the incident to the Information Security Department.

Application Development Standards

Application developers must ensure their programs contain the following security precautions. Applications:

- Shall support authentication of individual users, not groups.
- Shall not store passwords in clear text or in any easily reversible form.
- Shall provide for some sort of role management, such that one user can take over the functions of another without having to know the other's password.
- Shall support TACACS+, RADIUS and/or X.509 with LDAP security retrieval wherever possible.













National Distribution Centre Unit 10, Kites Croft Business Park, Fareham, Hampshire, PO14 4LW

Use of Passwords and Passphrases for Remote Access Users

Access to the SMI Group Networks via remote access is to be controlled using either a one-time password authentication or a public/private key system with a strong passphrase.

Passphrases

Passphrases are generally used for public/private key authentication. A public/private key system defines a mathematical relationship between the public key that is known by all, and the private key, that is known only to the user. Without the passphrase to "unlock" the private key, the user cannot gain access.

Passphrases are not the same as passwords. A passphrase is a longer version of a password and is, therefore, more secure. A passphrase is typically composed of multiple words. Because of this, a passphrase is more secure against "dictionary attacks."

A good passphrase is relatively long and contains a combination of upper and lowercase letters and numeric and punctuation characters. An example of a good passphrase:

"The*?#>*@TrafficOnThe101Was*&#!#ThisMorning"

All of the rules above that apply to passwords apply to passphrases.

Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. Password cracking or guessing may be performed on a periodic or random basis by the Information Security Department or its delegates. If a password is guessed or cracked during these exercises, the user/owner will be required to change it.

Terms and Definitions

Definition <u>Term</u>

Application Administration Account Any account that is for the administration of an application (e.g., Oracle database administrator, ISSU administrator).













National Distribution Centre Unit 10, Kites Croft Business Park, Fareham, Hampshire, PO14 4LW

Revision History

Author - Data

Workstation Security Policy

Purpose

The purpose of this policy is to provide guidance for workstation security for SMI Group workstations to ensure the security of information on the workstation and information the workstation may have access to. Additionally, the policy provides guidance to ensure the requirements of the HIPAA Security Rule "Workstation Security" Standard 164.310(c) are met.

Scope

This policy applies to all SMI Group employees, contractors, workforce members, vendors and agents with a SMI Group-owned or personal-workstation connected to the SMI Group network.

Policy

Appropriate measures must be taken when using workstations to ensure the confidentiality, integrity and availability of sensitive information, including protected health information (PHI) and that access to sensitive information is restricted to authorized users.

Workforce members using workstations shall consider the sensitivity of the information, including protected health information (PHI) that may be accessed and minimize the possibility of unauthorized access.

SMI Group will implement physical and technical safeguards for all workstations that access electronic protected health information to restrict access to authorized users.

Appropriate measures include:

- Restricting physical access to workstations to only authorized personnel.
- Securing workstations (screen lock or logout) prior to leaving area to prevent unauthorized access.
- Enabling a password-protected screen saver with a short timeout period to ensure that workstations that were left unsecured will be protected
- Complying with all applicable password policies and procedures.
- Ensuring workstations are used for authorized business purposes only.













National Distribution Centre Unit 10, Kites Croft Business Park, Fareham, Hampshire, PO14 4LW

- Never installing unauthorized software on workstations.
- Storing all sensitive information, including protected health information (PHI) on network servers
- Keeping food and drink away from workstations in order to avoid accidental spills.
- Securing laptops that contain sensitive information by using cable locks or locking laptops up in drawers or cabinets.
- Complying with the Portable Workstation Encryption policy
- Complying with the Anti-Virus policy
- Ensuring that monitors are positioned away from public view. If necessary, install privacy screen filters or other physical barriers to public viewing.
- Ensuring workstations are left on but logged off in order to facilitate after-hours updates. Exit running applications and close open documents
- Ensuring that all workstations use a surge protector (not just a power strip) or a UPS (battery backup).
- If wireless network access is used, ensure access is secure by following the Wireless Access policy

Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Definitions

Workstations include laptops, desktops, PDAs, computer based medical equipment containing or accessing patient information and authorized home workstations accessing the SMI Group network.

Workforce members include employees, volunteers, trainees, and other persons under the direct control of SMI Group

Revision History













Head Office

Vision House, Bedford Road, Petersfield, Hampshire, **GU323QB**

National Distribution Centre Unit 10, Kites Croft Business Park, Fareham, Hampshire, PO14 4LW





