

## Mindtools Kineo Integrated Management System (IMS) Policy

Version 4

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Prepared for: Mindtools Kineo

Prepared by: Legal and Compliance Manager

Approved by: Chief Operating Officer – ELT representative

**Version:** 4      **Title:** Mindtools Kineo Integrated Management System (IMS) Policy

## Document revision history

| Version | Changed by                     | Summary of change                                                                       | Approval date               |
|---------|--------------------------------|-----------------------------------------------------------------------------------------|-----------------------------|
| 1.0     | Managing Director              | Initial Document                                                                        | 2 March 2020                |
| 1.0     | Measures and Metrics Committee | No changes                                                                              | 11 February 2021            |
| 1.0     | Measures and Metrics Committee | No changes                                                                              | 21 August 2022              |
| 2       | Legal and Compliance Officer   | Privacy link added to statement of Commitment                                           | 30 August 2023              |
| 3       | Legal and Compliance Officer   | Change entity name and signatory, review content and ensure coverage across all regions | 5 <sup>th</sup> August 2025 |
| 4.      | Legal and Compliance Manager   | Rebrand, update to include BCP and Environmental and cover all regions                  | 1 <sup>st</sup> April 2026  |

## Approval

| Date effective | Superseding | Policy review date                          | Approver                                         |
|----------------|-------------|---------------------------------------------|--------------------------------------------------|
| 31 August 2023 | V1          | As required                                 | Leadership Team                                  |
| 07 August 2025 | V2          | As required                                 | Legal and Compliance Officer and Leadership Team |
| 06 April 2026  | V3          | At least annually/following material change | Chief Operating Officer and ELT                  |

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## Mindtools Kineo Integrated Management System (IMS) Policy

### Our Mission

*We deliver tailored end-to-end solutions combining behavioural science and scalable technology to equip organizations for today's challenges and tomorrow's opportunities*

### Statement of Commitment

Mindtools Kineo is committed to delivering high-quality products and services that meet applicable customer, legal, regulatory and contractual requirements and support positive outcomes for our customers and other interested parties. We promote a culture of accountability, continual improvement and operational excellence across our global operations.

We recognise that quality, information security, business continuity and operational resilience, [data protection and privacy](#), and environmental responsibility are fundamental to the successful and sustainable delivery of our products and services.

Mindtools Kineo manages risks and opportunities relating to these areas through our Integrated Management System (IMS) and through the development, implementation, maintenance and continual improvement of appropriate governance, policies, processes, controls and risk-management practices.

Our IMS provides a consistent and proportionate framework for managing our obligations and supporting effective governance across the organisation. It incorporates the principles and applicable requirements of our management systems, including ISO 9001 for Quality Management, ISO/IEC 27001 for Information Security Management and ISO 22301 for Business Continuity Management, together with applicable environmental-management requirements and our data protection and privacy framework.

Where certification is held, Mindtools Kineo maintains its management systems in accordance with the applicable certification requirements. Where certification or expansion of certification is in progress, we work towards implementation and demonstration of conformity with the relevant standard.

We are committed to establishing and maintaining practical, proportionate and effective policies, procedures and controls that protect the integrity and resilience of our operations and safeguard the interests, information and expectations of our customers, employees, partners and other interested parties.

### To support this commitment, Mindtools Kineo will:

- Comply with applicable obligations – identify, monitor and comply with applicable local, regional and international legal, regulatory, contractual and other requirements relevant to our operations, including requirements relating to quality, information security, business continuity, data protection, privacy and, where applicable, environmental management.
- Protect information and personal data – maintain appropriate technical and organisational measures to protect Mindtools Kineo and customer information and to preserve the confidentiality, integrity and availability of information throughout its lifecycle.
- Protect the environment and improve environmental performance – manage the environmental impacts associated with our operations, promote responsible use of resources, prevent pollution where applicable, consider climate-related risks and opportunities, meet applicable environmental compliance obligations, and establish objectives that support continual improvement in environmental performance.
- Maintain operational resilience – identify critical business activities, systems, resources, suppliers and dependencies and maintain appropriate Business Continuity and Disaster Recovery arrangements to support continued delivery and effective recovery following disruption.

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- Manage risks and opportunities – systematically identify, assess, treat, monitor and review risks and opportunities that may affect the achievement of IMS objectives, customer requirements or the continuity and security of our operations.
- Develop competence and awareness – provide personnel with appropriate training, information and guidance to ensure they understand their responsibilities relating to quality, information security, business continuity, data protection, privacy and other applicable IMS requirements.
- Maintain effective controls – implement proportionate and effective quality, security, privacy and continuity controls appropriate to the nature of our operations, information assets, services, technologies and associated risks.
- Manage suppliers and third parties – assess and manage relevant supplier and third-party risks and establish appropriate contractual, security, privacy, quality and continuity requirements where applicable.
- Establish measurable objectives – establish, monitor and periodically review measurable IMS objectives, measures and metrics that support the organisation's strategic direction and enable evaluation of the effectiveness and performance of the IMS.
- Monitor and evaluate performance – review IMS performance through established governance mechanisms, including relevant management forums, Measures & Metrics reviews, risk reviews, internal and external audits and formal Management Reviews.
- Respond to incidents and non-conformances – encourage the timely identification and reporting of incidents, near misses, non-conformances and control weaknesses and ensure appropriate investigation, corrective action and lessons learned.
- Continually improve – use performance data, audit results, incidents, customer and interested-party feedback, risk assessments, lessons learned and changes in the organisation or its operating environment to identify and implement opportunities for continual improvement.
- Support customer confidence – provide appropriate assurance to customers and other interested parties regarding the protection of information entrusted to Mindtools Kineo and the quality, security, resilience and governance of the services we provide.
- Maintain our reputation and organisational resilience – protect the Mindtools Kineo brand and support the organisation's ability to deliver sustainable, reliable and trusted services across its global operations.

## Management Commitment and Responsibilities

The Executive Leadership Team fully endorses this Statement of Commitment and the Integrated Management System established to support it.

The Chief Operating Officer provides executive oversight of the IMS, while the Legal & Compliance Manager / IMS Owner is responsible for coordinating its implementation, maintenance, monitoring and continual improvement.

Management is responsible for ensuring that appropriate resources are available to support the effective operation of the IMS and that its requirements remain aligned with Mindtools Kineo's strategic direction, organisational context, risks and obligations.

All employees, contractors and other personnel working on behalf of Mindtools Kineo have a responsibility, appropriate to their role, to understand and comply with applicable IMS policies, procedures and controls; protect company and customer information; report incidents, risks, near misses and non-conformances; and contribute to the continual improvement of the organisation.

The suitability, adequacy and effectiveness of the IMS and this Statement of Commitment will be reviewed periodically and following significant organisational, regulatory, technological or operational changes where appropriate.

Tracey Newman  
Chief Operating Officer

Mindtools Kineo is the trading name of Mind Tools Ltd, including all its current and future subsidiaries and affiliates.  
Date: 6-April-2026