

nexon



INTEGRATED MANAGEMENT SYSTEM MANUAL V9.0

I.T. FOR THE
DYNAMIC BUSINESS

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1 DOCUMENT CONTROL

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V9	Reviewed and updated to reflect current practices (CI 267 & 272)	Elia El-Turk	11/05/2023

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Copy	Name	Recipients
Master	Nexon Employee	QNOC online distribution

1.3 REFERENCE

Information referred
ISO 27001:2013, ISO 9001-2015, ISO14001-2015 & ISO45001-2018 Standards
IT Best practice

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2 ABOUT NEXON

Nexon Asia Pacific (Nexon) is an award-winning digital consulting and managed services partner for mid-market, enterprise, and government organisations. Our uniquely broad suite of solutions serves clients who require end-to-end capability coupled with specialist expertise in security, cloud, and digital solutions. The company continues to build upon its commercial viability with further targeted expansions within the cloud, digital, network, contact centre, workforce optimization and cybersecurity;

Committed to the highest standards of responsiveness, competency, and transparency in every interaction, Nexon is built on a unique client care model that is fuelled by continuous client feedback and high-touch service. Now employing over 450 staff across Sydney, Newcastle, Melbourne, Brisbane, Gold Coast, and Adelaide, Nexon is pointedly structured and culturally driven to deliver the highest standards of service to propel your agency forward.

Nexon operations are governed by an accredited third-party certified Integrated Management System that incorporates Quality, Environmental, Work Health & Safety, and Information Security Management disciplines. Additionally, a number of Product and/or Industry accreditations such as CREST certifications are also maintained that facilitate Premium partnerships with a number of key IT suppliers. We partner with world-class technology vendors including Microsoft, AWS, ServiceNow, Genesys, Cisco, NetApp, and more, and have won over 15 business partner awards for vision, partnership, innovation, and excellence. Our partner community extends to long-standing sub-contracting partnerships with Best Technology and Green Light to ensure adequate reach across both metro and regional Australia.

Nexon takes a lead with respect to Corporate Social Responsibilities with tangible Environmental Management (Carbon Footprint Reduction Plans) and appropriate workforce and labour management practices in place, inclusive of WGEA contribution and publication Modern Slavery Statement.

As a growing organisation, and backed by EQT Mid-Market Asia fund III, Nexon has the financial support to continuously innovate and offer businesses and government agencies commercial models that are both scalable and flexible for seeing our clients achieve, grow and prosper.

3 PURPOSE

The purpose of this document is to describe the methodology applied in the implementation of the Integrated Management System (IMS) in compliance with the requirements set in the following management systems standards:

- ISO9001:2015 Quality Management System (QMS),
- ISO14001:2015 Environmental Management System (EMS),
- ISO27001:2013 Information Security Management System (ISMS),
- ISO45001:2018 Occupational health and safety management system (OHSMS).

4 CONTEXT OF THE ORGANISATION

The following sections provide a high-level description of the Integrated Management System (IMS) context and scope.

4.1 ORGANISATIONAL CONTEXT

Management is committed to defining and determining our position in the marketplace and understanding how relevant internal factors such as values, culture, knowledge and performance of the organisation, and external arising from legal, political, economic, competitive, cultural, social and technological issues influence our strategic direction, operations and our Organisational context.

Our Strategy and Transformation team is responsible for identifying and setting the organisation strategic directions in line with our EQT strategic directions, ensuring all our internal and external issues are relevant to their respective portfolio’s purpose, its strategic direction and its ability to achieve the intended results both in terms of quality, safety, information security and the environment. These are then raised with our Executive Leadership Team (ELT) and are discussed at the regular ELT meetings to define the company goals and objectives, along with the Learning and Growth, and Processes required to achieve those objectives. This work is overseen by the CCO, who sits on the ELT.

The following diagram reflects the company approach to defining, establishing and reviewing the organisational context, strategies and directions in line and full understanding of our interested parties needs and requirements:



Management identifies, analyses, monitors and reviews factors that may affect our ability to satisfy our customers and stakeholders, as well as, factors that may adversely affect the stability of our process, or our management system’s integrity.

To ensure that our IMS is aligned with our strategy, whilst taking account of relevant internal and external factors; we initially collate and analyse pertinent information in order to determine potential impact on our context and subsequent business strategy. We then monitor and review this information to ensure that a continual understanding of each group’s requirements is derived and maintained. To facilitate the understanding of our context, we regularly consider issues that influence our context during our Executive Management Strategic review meetings and are conveyed via minutes and business planning documents.

The output from this activity is evident as an input to the consideration of risks and opportunities, and the actions that we take to address them. (Refer to Section 6.1 for more information about our risk and opportunity management framework.)

4.2 SCOPE OF THE MANAGEMENT SYSTEM

The Nexon Integrated Management System (IMS) is established to cater for the company operations across all locations. The aim is to establish an integrated management system platform upon which the broader company can operate.

The **Scope of Certification** of the Nexon Integrated Management System (IMS) is defined as follows:

Provision of Information and Communication Technology (ICT) Solutions, Support and Security Services.

The **Scope of the Integrated Management System** encompasses the operations across the following locations:

<i>Head office / Site</i>	<i>State</i>	<i>Address</i>
<i>Sydney Head office</i>	<i>NSW</i>	<i>60-70 Parramatta Rd, Summer Hill NSW 2130</i>
<i>Sydney CBD</i>	<i>NSW</i>	<i>Level 7, 55 market street Sydney NSW 2000</i>
<i>Brisbane</i>	<i>Qld</i>	<i>33 McKechnie Dr, Eight Mile Plains QLD 4113</i>
<i>Melbourne</i>	<i>Vic</i>	<i>Level 28, 570 Bourke St, Melbourne, VIC 3000</i>
<i>Gold Coast</i>	<i>Qld</i>	<i>Level 2, Gateway Building 50 Appel St, Surfers Paradise QLD 4217</i>
<i>Newcastle - CSA</i>	<i>NSW</i>	<i>21 Annie St, Wickham NSW 2293</i>
<i>Brisbane - Equate</i>	<i>Qld</i>	<i>East Tower, Level 12, 410 Ann St, Brisbane QLD 4000</i>

The services delivered by the company may differ between the sites, however, the services delivered by Nexon are set and included in the above scope of system and certification.

4.3 SCOPE EXCLUSION

The following are excluded from the scope of the certification:

ISO 27001-2013 – A.14 System Acquisition, Development and Maintenance –

The following controls are claimed as an exclusion in Statement of Applicability, and they are:

- A.14.2.4 – No software code development take place; all work is using DevOps in Azure;
- A.14.2.7. – No outsourced activities take place; all work is completed in-house.

ISO9001-2015 – Due to the nature of the business, no calibration of equipment is required and the controls are only set to cover the equipment maintenance and support activities.

Related Documents	Responsibility
SP-004 Procedure for Business Planning	Compliance Manager

5 LEADERSHIP AND PLANNING

5.1 LEADERSHIP AND COMMITMENT

Nexon management ensures that the Integrated Management System (IMS) is established, implemented and maintained in a planned and systematic manner. This is accomplished with the appointment of the Operations Manager as the company Compliance Manager, responsible for the adequate and effective implementation, management and maintenance of the system.

The company management demonstrates leadership and commitment to the IMS by:

- Taking accountability for the effectiveness of the management system;
- Ensuring that company policies and objectives are established and are compatible with the context of and strategic direction of the company;
- Ensuring the integration of the IMS requirements into the company’s business processes;
- Promoting awareness of the process approach, risk- based thinking, quality and information security awareness;
- Ensuring that the resources needed for the IMS are available;
- Communicating the importance of effective management systems and of conforming to the IMS requirements;
- Ensuring that the IMS achieves its intended results;
- Engaging, directing and supporting persons to contribute to the effectiveness of the IMS;
- Promoting improvement;
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

5.2 CUSTOMER FOCUS

Top Management Team adopts a customer-first approach which ensures that customer needs and expectations are determined, converted into requirements and are met with the aim of enhancing customer satisfaction.

This is accomplished by assuring:

- a) customer and applicable statutory and regulatory requirements are determined, understood and consistently met;
- b) the risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed;
- c) the focus on enhancing customer satisfaction is maintained.

As part of the process of continual improvement, top management monitors and reviews information about its external and internal issues to stay ahead of the game.

5.3 COMPANY POLICIES

Management have prepared and issued several company policies to be adhered to and followed within the organisation. These policies cover a wide range of business activities, including but not limited to the requirements of ISO9001, ISO14001, ISO27001 and ISO45001 standards; Policies are included and or referenced in the company induction process.

The company policies are regularly reviewed, maintained and promoted internally within the organisation & externally where and as applicable to the company clients and stakeholders as part of our commitment to comply with the relevant regulations, acts and statutory requirements as applicable.

Related Documents	Responsibility
SY01 – Integrated Management System Policy	CEO
Other policies - QNOC	CEO

5.4 RESPONSIBILITY AND AUTHORITY

Management provides sufficient resources to guarantee the implementation and maintenance of the IMS. Relevant roles, responsibilities and authorities are defined, documented and communicated in order to facilitate effective management.

All position descriptions include specific requirements for compliance with quality and information security responsibilities. These responsibilities are communicated as part of the recruitment process and during inductions.

Our Chief Customer Services Officer (CCSO) has been appointed with responsibility and authority to:

- ensure the implementation and maintenance of the management system and promotion of awareness of customer requirements.
- ensure that the performance, evaluation and necessary measures for improvement of the management system are reported to the company's management.

The CCSO has delegated the IMS responsibility to the Compliance Manager to manage and maintain the Nexon IMS and standards related requirements.

<i>Related Documents</i>	<i>Responsibility</i>
Organisation Chart (also reflected in Bamboo)	People Experience
Job Descriptions	People Experience

6 PLANNING

6.1 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

A Risk Management Methodology is established and maintained within the company. The approach taken is to identify, manage and address any opportunities and risks (risk-based thinking) that might affect the business at all levels. Risk management starts at the strategic level and spreads across all levels of the business.

All opportunities raised from CI's, incidents, near misses, safety issues, business reviews, or any potential concern that may reflect a threat or hazard on the company is identified and managed using the company established risk register and addressed using the established risk treatment process.

<i>Related Documents</i>	<i>Responsibility</i>
SP027 - Risk Management Methodology	Compliance Manager
Risk Register – QNOC	Risk owner / Management Team

6.2 ENVIRONMENTAL ASPECTS, HEALTH, AND SAFETY HAZARDS

6.2.1 WHS AND ENVIRONMENTAL ASPECTS

Nexon management is responsible to identify the WHS hazards and Environmental impacts of the activities, products and services over which the Organization has control or influence, including activities, products or services of subcontractors and suppliers. The company considers these WHS and Environmental risks which have or can have impact on safety and the Environment when setting WHS and Environmental objectives.

We periodically review WHS hazards and Environmental aspects, and their risks and impacts during / resulting from:

- Operational reviews
- management reviews
- impending change(s) to a process
- installation of a new or reconfigured product
- interested party or regulatory authority feedback

6.2.2 PLANNING IDENTIFICATION, ASSESSMENT AND CONTROL OF RISKS

The management Team is responsible to implement and maintain procedures to identify WHS hazards and Environmental aspects and assess and control the associated risks of activities, products and services over which Nexon has control or influence, including activities, products or services of subcontractors and suppliers.

6.3 INTEGRATED MANAGEMENT SYSTEM OBJECTIVES

Nexon has established its Integrated Management System or business objectives, and ensures these objectives are communicated to and understood by all relevant levels of staff. Targets are established and monitored by management on a continuing basis and reviewed at least annually during management review meeting.

Related Documents	Responsibility
Objectives Register - QNOC	Compliance Manager
SP004 - Procedure for Business Planning	Compliance Manager

6.4 PLANNING FOR CHANGE

The integrated management system is planned and implemented to meet our corporate objectives and the requirements of ISO 9001, 14001, 27001 & 45001. The planning process involves establishing and communicating our policies, objectives and associated operational procedures.

This manual constitutes our overall plan for establishing, maintaining, and improving the integrated management system. For each instance of management system planning, the output is documented and retained accordingly, and changes are conducted in a controlled manner. The management review and the internal audit processes ensure that the integrity of the IMS is maintained when significant changes are planned which may affect key processes.

Whenever the integrated management system changes are planned, Top management ensures that all personnel are made aware of any changes which affect their process, and that subsequent monitoring is undertaken to ensure that IMS changes are effectively implemented.

7 SUPPORT- RESOURCES

7.1 PEOPLE, COMPETENCE, TRAINING, AND AWARENESS

Resources are allocated to their respective roles based on the company structure and requirements. If in-house personnel do not have sufficient background / qualifications to undertake the activities, they will be sub-contracted to approved suppliers/ third party of such activities by the Operations Manager or CEO.

Allocation of Resources for the correct completion and performance of all the activities carried out within the Company are detailed in this Manual, supporting procedures and instructions as applicable. Competency needs are identified based on clients relevant / requested services. Personnel are engaged based on their skills and experience.

Induction and awareness training are established and delivered to ensure staff at all relevant levels are aware of the Nexon’s IMS, as well as their roles / responsibilities and procedures relevant to their tasks.

Personnel performing specific assigned tasks are competent on the basis of education, appropriate training and/or experience as required. Records are maintained for each staff as required.

Related Documents	Responsibility
SY010 - IS Awareness and Training Policy	Compliance Manager
Employee Competency / Training Records	Compliance Manager
SF001 - Checklist for new / exit employee – Induction	Compliance Manager

7.2 ORGANIZATIONAL KNOWLEDGE

Nexon determines the knowledge necessary for the operation of its processes and to achieve conformity of products and services. This may include knowledge and information obtained from:

- a) internal sources, such as lessons learned, part competence gained by experience, feedback from subject matter experts, and/or intellectual property.
- b) external sources such as standards, academia, conferences, and/or information gathered from customers or suppliers.

This knowledge is maintained and made available to the extent necessary.

When addressing changing needs and trends, Nexon considers its current knowledge and determine how to acquire or access the necessary additional knowledge.

7.3 COMMUNICATION PARTICIPATION AND CONSULTATION

Nexon recognises the need for effective communication, participation, and consultation internally, between all levels of the organisation, and externally with the clients, contractors and all stakeholders. This is important to:

- ensure that all staff are aware of the company objectives
- ensure that all staff are aware of quality, safety, environmental and information security issues relating to the system
- demonstrate commitment to the integrated management system requirements.
- ensure that all staff are aware of changes in the organisation such as latest updates, acquisition, new threats and so on.

Nexon will facilitate this through communication emails, reports, staff team meetings, change board or toolbox talks meetings, and management review meetings. Where required, external communication may take place with customers, third party or suppliers as required.

Related Documents	Responsibility
Management review meeting – QNOC	Compliance Manager
ST013- Communication Plan	Compliance Manager
SP006 Consultation Communication & Participation	Compliance Manager

7.4 DOCUMENTED INFORMATION

Documented Information covers the controls exercised by Nexon management over all Company related information and the methods established to manage, maintain, secure and control such information.

Our documents consist of an integrated management system manual, policies, procedures, job descriptions, forms, templates, and registers.

The document, records control, and procedure for Information Labelling and Handling are made available to staff via QNOC to describe method of storage, specify storage requirements of secured documents and data to protect records from misuse, damage, deterioration, loss and unauthorised use.

7.4.1 DOCUMENT SECURITY CLASSIFICATION

An Information Classification policy is established and followed within the system. The policy covers the internal or external usage of the documents which are identified as follows:

Level	Labeling	Classification criteria	Access restriction
Public or General	(unlabeled)	Making the information public cannot harm the organization in any way	Information is available to the public
Internal use	(unlabeled)	Unauthorized access to information may cause minor or no damage and/or inconvenience to the organization	Information is available to all employees and selected third parties

Level	Labeling	Classification criteria	Access restriction
<i>Commercial</i>	<i>Commercial in Confidence</i>	<i>Information associated with customers / suppliers / business partnerships</i>	<i>Information is available only to a specific group of employees and authorized third parties</i>
<i>Restricted</i>	RESTRICTED	<i>Access to the information is limited to authorized personnel with relevant clearances (where required). Unauthorized access may cause considerable damage to the business and/or its reputation.</i>	<i>Information is available only to a specific group of employees with relevant security where and as applicable</i>

7.4.2 DOCUMENTATION HOSTING

The main system used to manage and maintain all IMS related documents is QNOC. All master copies are maintained and managed in QNOC. However, and for users' convenience copies of some documents are maintained in other environments such as SharePoint or Bamboo, etc

Documented information pertaining to a customer's environment is maintained in the Managed Services knowledge base in SNOW. This includes:

- Documented information required for the provisions of services to contract customers e.g., work instructions and guidelines.
- Documented information needed to support products specific to contract customers e.g., trouble shoot guides.
- Knowledge base articles relating to products and technology

Any paper copy of a document is uncontrolled and staff must ensure that it is the latest copy by checking its source. Similarly, any local electronic copy (i.e. on user's laptop or workstation) is uncontrolled. It is the responsibility of the user to ensure that it is the latest copy by checking its source.

HR related documented information, policies and procedures are maintained in Bamboo. Nexon personnel are provided access to such information.

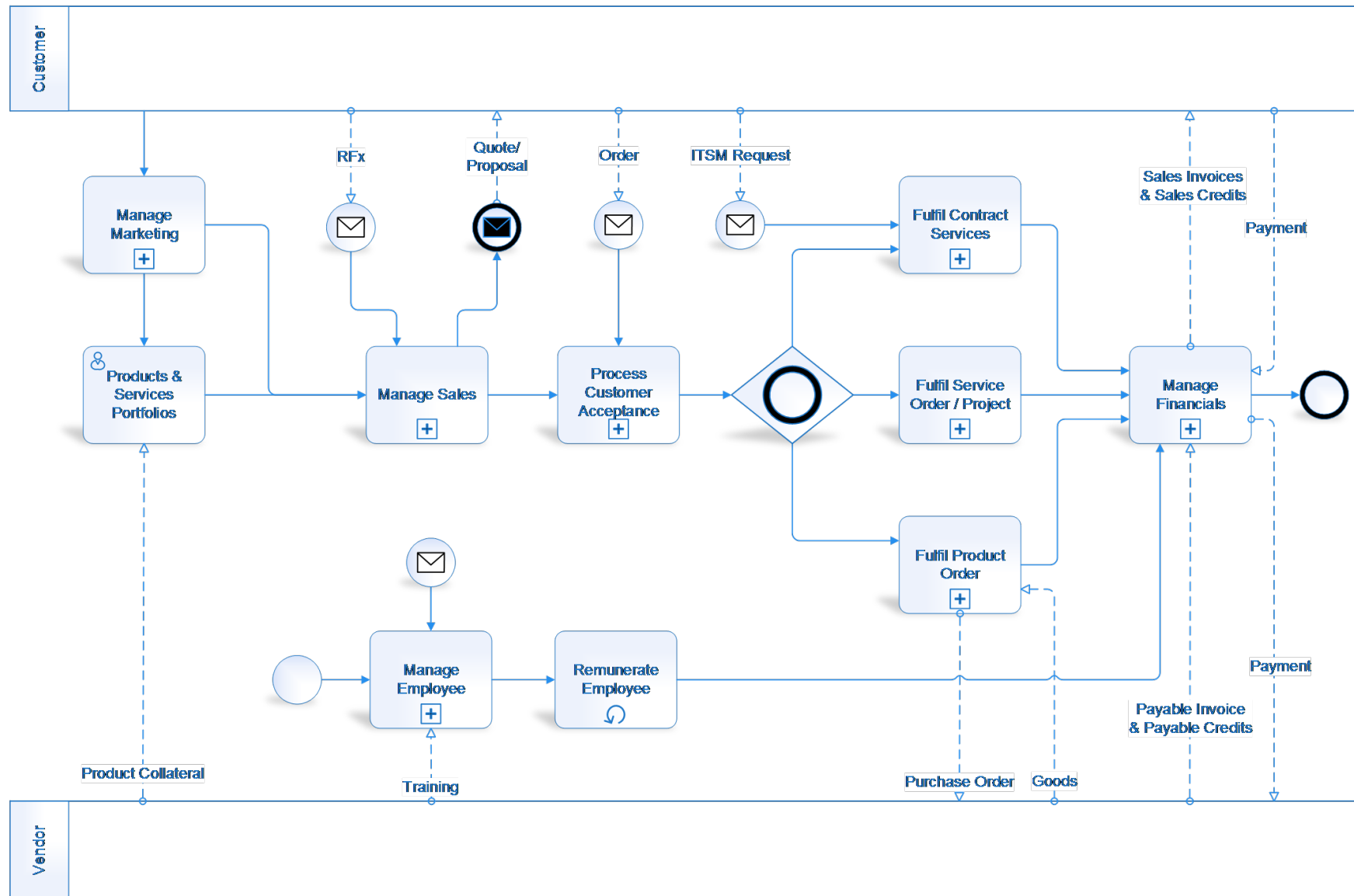
Related Documents	Responsibility
SP-001 Document Control	Compliance Manager
SR-002 Records Control	Compliance Manager
SY-009 Information Classification Policy	Compliance Manager
SP-012 Procedure for Information Labelling and Handling	Compliance Manager

8 OPERATIONAL CONTROL

8.1 PLANNING AND CONTROL

Management and staff identify, plan and control operations and activities that are associated with Nexon services and customers' requirements. We ensure that those activities are suitably controlled and managed to meet or exceed the specified and defined requirements. This will be achieved through procedures and support documentation, all prepared, managed and readily available in QNOC.

The Nexon business processes interactions are defined and reflected in the following diagram:



Process Interactions Diagram

8.2 REQUIREMENTS FOR PRODUCTS AND SERVICES

Business development managers and Account Managers are tasked with managing customer relationships. Dynamics or business solutions 365 is used as follows:

- *MS Dynamics 365 CRM as a centralised CRM solution for all marketing and customer relationship management (Sales, Business Development, Opportunities, Quotations);*
- *DGIT for all Service Ordering and Billing (CPQ, Telflow, Inomial)*
- *MS Dynamics 365 Business Central for all finance systems*
- *Service Now (SNOW) ITSM for all Managed Services;*
- *Service Now (SNOW) for Professional Services/Projects Automation (PSA)*

8.3 DESIGN AND DEVELOPMENT

Nexon Design process is limited to the provision of business applications solutions using the Microsoft portfolio (Azure, Dynamics, O365, Business Central, etc.). The solutions are developed and built using the Microsoft environment and in line with the Microsoft procedures and instructions.

Processes are defined and established within the company for the delivery followed when performing the work are established and followed using the DevOps processes, libraries, and methodologies.

8.4 PROJECT MANAGEMENT

A Project Management Methodology is established within the organisation and followed when delivering services and solutions to the customers. The methodology is well established and followed within the organisation for the delivery of medium and major projects, regardless of the service or solution. Project plans, schedules and teams are set and assigned to deliver the work securely, on time, budget and to the requirements of the clients. Risk management rules and methodologies are applied and followed when delivering projects.

8.5 MANAGED SERVICES

Managed Services are planned and delivered using SNOW in line with the ITIL Framework in relation to the following processes:

- *Configuration Management – provides comprehensive information about all components in the infrastructure that enable all other processes to function more effectively and efficiently.*
- *Change Management – covers the process for all types of change (from request, to assessment, to scheduling, to implementation, and finally to review). It produces approval (or not) for any change.*
- *Release Management – undertakes the planning, design, build and testing of hardware and software to create a set of release components for a live environment.*
- *Incident Management – the goal of this process is to restore normal service as quickly as possible following loss of services, and to minimise the adverse impact on business operations, thus ensuring the best possible levels of service quality and availability are maintained.*
- *Problem Management – is both reactive and proactive. The reactive aspect is concerned with identifying and solving problems in response to one or more incidents. The proactive aspect is concerned with identifying and solving the underlying causes of incidents before they recur.*
- *Service Desk - a central point of contact for Customers to report difficulties. It integrates business processes into the service management infrastructure by providing an interface for other activities such as Change Requests, Service Level Agreements and Configuration Management.*

Related Documents	Responsibility
SP-054 Business Acquisition Procedure	Sales / Presales
SP-055 Business Handover Procedure	Sales / Presales

Related Documents	Responsibility
SP-008 Project Delivery Methodology Procedure	Project Manager
SP-026 Service Management lifecycle Procedure	Service Delivery Manager / Service Desk Manager / Operations Manager / Compliance Manager

8.6 EQUATE TECHNOLOGIES

Equate Technologies (Equate) is a Nexon Asia Pacific Company operating from Brisbane. The company provides Integrated Cyber Security Solutions as part of the Nexon Portfolio. While operating from Brisbane, the services are provided nationally as part of the Nexon suite of products and services.

The processes established and followed by Equate follow the same process flow and approach set within the Nexon processes, however, using in some cases different tools to perform the work. The processes established and tools used are listed below:

1. Sales & Pre-Sales using the Accelo online application;
2. Professional Services O365 and Confluence/Jira
3. Managed Services using Confluence/Jira system

Alignment and integration of processes within the Nexon system are planned and taking place. Most of the alignment activities are set to migrate the processes to start using the Nexon tools unless specified and approved otherwise.

In addition, a number of tools are applications are used for the delivery of the services to cover Security, Capacity Management etc. These tools are listed as part of the Nexon Asset Register and maintained accordingly.

8.7 EHS OPERATIONAL CONTROL

Management ensures EHS controls are identified, understood and implemented to ensure our employees, clients, contractors and/or visitors enjoy a safe and environmentally friendly work environment. In general, the nature of the work environment is somewhat of a low to medium risk.

The company operations do not include any high-risk activities or operations, with the exceptions of stored diesel fuel quantities located within approved industry quality containment. These have been built and established in environmentally friendly and safe environments.

All the company safety hazards & risks, environmental aspects and impacts as well as information security threats and impacts are clearly identified and addressed in accordance with the company Risk methodology plan. Risk register(s) are prepared at the corporate and data centres levels to identify, address, and review the various risks and related controls.

8.8 PURCHASING

Purchased goods and services are limited to purchasing products / services to be incorporated in the solutions developed and delivered to customers and Nexon capital expenses. All suppliers / third party with Nexon are reviewed, evaluated and monitored.

Related Documents	Responsibility
SP-010 Purchasing Procedure	Operations Manager
SY-030 Third Party Management Policy	CEO, Operation Manager

8.9 EMERGENCY PREPAREDNESS AND RESPONSE

Nexon has established an Emergency Preparedness and Response process that identifies the potential for emergency situations and ensure that the appropriate response mechanisms are

established for incidents and emergency situations within the office, and where and when applicable on Nexon premises.

Related Documents	Responsibility
SP-056 - Nexon Service Continuity - Business Continuity Disaster Recovery Plan	Operations Manager / Compliance Manager / Process owners
SP057 - Nexon Service Continuity - BCP DR Test Plan	Operations Manager / Compliance Manager / Process owners

9 REVIEWING AND IMPROVING OUR SYSTEMS

9.1 MONITORING, MEASUREMENT, ANALYSIS & EVALUATION

The Nexon IMS Policy is reviewed and updated (where required) regularly to ensure key concepts and processes remain relevant. This will be achieved through:

- Monitoring and reviewing implementation processes, outputs and Nexon business directives.
- Undertaking periodic controls assessments where the results are reported to the management in form of a flash report; and
- Ensuring ownership of the processes and risk profiles developed rests with Nexon management.

Compliance with the IMS Policy will be monitored on a regular basis. This Policy, with its supporting documentation, are reviewed as per the document control plan to ensure completeness, effectiveness, and usability.

Evaluation of services for quality, safety, environmental and compliance with relevant client's specifications or contractual requirements are determined by the review and verifications of the relevant reports or activities performed by staff members. Nexon ensures that any non-conforming services are identified, recorded and the Compliance Manager is notified to enable action to be taken to rectify the relevant issue, determine the cause and ensure adequate corrective actions take place.

IMS related issues are reviewed by the team in a forum. This includes risk management matters such as the level of residual risk and acceptable risk, considering changes to the business, technology, business objectives, processes, potential threats, social climate and legislation.

9.2 CUSTOMER SATISFACTION

Nexon monitors information on client satisfaction and /or dissatisfaction as one of the key performance indicators through ticketing system.

The following methodologies are used to measure and monitor client satisfaction and /or dissatisfaction:

- analysis of the number, type and frequency of client complaints / feedback through ticketing system.
- collection and analysis of client feedback.
- analysis of corrective action to resolve customer issue.

9.3 INTERNAL AUDIT

A documented procedure and program for internal audits is used to verify the use and effectiveness of the documented and implemented IMS. The internal audits are planned, scheduled, and conducted by external skilled and independent personnel on a regular basis. Audit plan, schedule, audit notes, audit findings, are recorded and maintained in QNOC and the result is taken as input into the Management review meeting.

9.4 MANAGEMENT REVIEW

Our system is reviewed at least annually through meetings between management and staff (as and when required) to ensure suitability and effectiveness. The review inputs and outputs are set

in accordance with the requirements of the Quality, and Information Security standards of the Integrated Management System.

Related Documents	Responsibility
SP-003 Internal Audit Procedure	Compliance Manager
SM-001 IMS Manual	Compliance Manager
SP-002 Continuous improvement procedure	Compliance Manager
SP-004 Procedure for Business Planning	Compliance Manager
Audit Schedule (QNOC)	Compliance Manager
Audit Reports (QNOC)	Compliance Manager
Management Review Reports (QNOC)	Compliance Manager

10 IMPROVEMENT

The IMS continual improvement process describes the steps taken by Nexon management to ensure the effectiveness of its IMS is continually improved using its risk management approach, IMS policies, audit results, and relevant IMS related processes.

Critical to the continual improvement process, is the corrective actions process. Nexon strive to resolve all corrective actions to the best of its capabilities and within all reasonable attempts.

10.1 NONCONFORMITY AND CORRECTIVE ACTION

Nexon carries out the necessary steps wherever applicable on best effort basis to eliminate the causes of nonconformities against the IMS in order to prevent recurrence. The process for corrective action defines the requirements for:

- Identifying nonconformities.
- Determining the causes of nonconformities.
- Evaluating the need for actions to ensure that nonconformities do not recur.
- Budget planning for corrective actions.
- Determining and implementing the corrective action needed.
- Recording results of action taken; and
- Reviewing corrective action taken.

10.2 CONTINUAL IMPROVEMENT

The implementation of the IMS is not a 'once-off' event. The integrated management system is a continuous improvement process to facilitate effective management of risks. This is critical to the achievement of strategic objectives embedded in and underpinning Nexon's goals and business plan.

Related Documents	Responsibility
SP-002 Continuous improvement procedure	Compliance Manager