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Review & Approved by	Reviewed by Technology Committee & Approved by Board of Directors

1. Overview

The intention of this Software Policy is to encourage an environment of informed and responsible behavior that supports the company's established culture of openness, trust and integrity whilst facilitating effective software asset management. Information Technology Services is committed to protecting employees, business partners, clients and the broker itself from illegal or damaging actions caused by individuals, either knowingly or unknowingly breaking software copyright. This policy outlines the acceptable activities in dealing with software at the Company.

Ineffective governance exposes the Company to risks including the inability to manage software with respect to costs, assets and media, licensing compliance and legal issues.

A centralized approach to software asset management enables the Company to maximize the return on investment and to minimise the risks related to software. The benefits of this approach include strategic alignment, volume purchasing, improved productivity, version optimization, better software support, easier administration, reduced risks from viruses and illegal software, and mitigation against breach of copyright and litigation due to non-compliance.

2. Definitions

2.1 Licence

The right to use the software granted by the licensor to the licensee under the conditions of the agreement.

2.2 Illegal software

Software that is copied or used outside the terms of the software Licence. Such copying and use is illegal under the Copyright Act and carries high penalties. This may apply to freeware, shareware, open source, proprietary, demo or trial versions of software.

2.3 Company clients

Employees, clients, Sub Broker, Authorised Person, Franchisee, Branch, Remisier, consultants, temporary staff and other officers at the Company, including all personnel affiliated through third parties.

2.4 Standard operating environment

Standard operating environment (SOE) is a specification for a standard computer architecture and software applications that is used within the Company. The implementation of a SOE leads to an environment that manages down the risks of copyright breaches or Licence non-compliance, improves reporting and reduces the total cost of ownership by increasing efficiency and productivity. The Company identifies a list of software applications that is made available to Company clients as required.

2.5 Authorised software

Software included in the list of authorised software applications, permitted to be used with or installed onto Company equipment.

3. Scope

This policy applies to all Company clients and computer equipment that is owned or leased by the Company and computers owned or leased by other parties that contain software licensed by the Company.

4. Key roles and responsibilities

4.1 The System Administrator has overall responsibility for software copyright compliance.

4.2 The Chief Financial Officer is responsible for implementing controls in Procurement to reinforce this policy.

4.3 The Designated Officer is responsible for the signing of software Licence agreements, development and implementation of controls, procedures and standards to implement this policy.

- 4.4** Cost Centre Managers are responsible to implement controls within their area of responsibility to reinforce this policy.
- 4.5** IT Services is responsible to inform Company clients about this policy, related procedures and standards including a list of authorised software applications that is used within the Company's SOE.
- 4.6** Company computer clients are responsible for knowing this policy, and to conduct their activities accordingly.

5. Policy

5.1 Software copyright compliance

5.1.1 The Company will only use a genuine copy of legally acquired software that is configured and used in accordance with the Licence terms and conditions as set out by the copyright holder.

5.1.2 The making or use of unauthorized or illegal software copies is prohibited.

5.2 Standardization of the operating environment

5.2.1 The Company deploys a standard operating environment (SOE) to all client computing systems to deliver a stable, supportable and secure platform for Company related activity.

5.2.2 Exceptions to the SOE and permission to self install software are subject to approval by the Cost Centre Manager and the Designated Officer or his/her delegate. Company clients who, under this clause, acquire and/or install software are responsible for ensuring that they do so in accord with the relevant IT Services procedure. In all instances clients must ensure that software is used in accordance with the Licence terms and conditions as set out by the copyright holder.

5.3 Software asset management

5.3.1 Software sourcing and acquisition is conducted through Information Technology Services in consultation with appropriate staff to ensure suitable Licence terms and conditions, pricing and compatibility with the Company's SOE.

5.3.2 Software is installed and distributed through Information Technology Services. As the software is licensed to the Company, the Company reserves the right to redistribute or withdraw software in support of evolving business needs.

5.3.3 Software media and administration documentation, whether hardcopy or electronic, is to be securely stored in a central repository.

5.3.4 Software user manuals will be added to the Library collection and may be available for loan.

5.3.5 Copies of software and documentation may be created for backup and disaster recovery purposes as permitted by the Licence terms and conditions.

5.3.6 Where software is subject to a periodic renewal, this renewal may be subject to review of continuing business needs. Where a renewal is required to retain valid software Licence but the Licence is not subsequently renewed, the software will be withdrawn from access.

5.3.7 Software media, backup and documentation are disposed of in accordance with the software Licence terms and the Company's disposal practices.

5.4 Policy enforcement

5.4.1 Where possible, controls will be in place within the Company to prevent the making or use of unauthorized or illegal software copies. These controls will include effective measures to verify compliance with acquired software licenses and Company standards.

5.4.2 Internal software audits will be conducted periodically on Company computers.

5.4.3 The Company reserves the right to remove unauthorized or illegal software, and to do so without prior notification where the risk to the Company is considered to be significant.

5.4.4 External audits, when requested by exchange, or other auditing bodies, are to be directed to the Designated Officer in the initial instance.

5.4.5 Breaches of this policy shall be treated as misconduct or serious misconduct and are dealt with in strict sense. The Company reserves the right to restrict access by an individual to information technology resources when faced with evidence of a breach of Company policies or law. Breaches that violate exchange and SEBI rules shall be reported to the appropriate authorities.