



INFORMATION SECURITY POLICY STATEMENT

"Virtual Pay International Limited ("Virtual Pay") is committed to ensuring integrity, confidentiality, availability, and security of our physical and information assets at all times for serving the needs and expectations of our interested parties both within organization and from external parties."

At Virtual Pay, we will work as one team to effectively secure our IT systems and information by:

1. Making sure information is protected to an appropriate level, based upon the impact of its disclosure, modification or loss.
2. Complying with all relevant information management legislation, regulations and standards.
3. Making sure that employees are clear about their responsibilities regarding ownership of information security, and that we expect them to take their legal and moral role seriously.
4. Managing the security of all computer systems and supporting infrastructure through the implementation of appropriate technical security controls.
5. Controlling access through the implementation of usernames, passwords and system privileges.
6. Making sure that security is an integral part of information systems including segregation of duties, change control procedures and agreed testing and approval processes.
7. Ensuring Information Security events and weaknesses are formally managed to allow timely corrective action to be taken.
8. Protecting critical information systems from the effects of major failures or disasters by deploying appropriately resilient infrastructure.
9. Ensuring redundant equipment, media and papers are disposed of securely.

We will annually review the Information Security policy and the way it operates, or more frequently in the case of significant change to the nature or scope of risk in the business.

ANDREW GUTHUA, CEO - 2026