

INFORMATION SECURITY POLICY SUITE

Change Management Policy

Glaxtons Consulting Limited

REF GCL-CMP-01

VERSION 6.0

CLASSIFICATION Confidential, internal and authorised third parties

DOCUMENT REFERENCE	GCL-CMP-01
CLASSIFICATION	Confidential, internal and authorised third parties
POLICY OWNER	Operations Director
APPROVED BY	The Board of Glaxtons Consulting Limited
EFFECTIVE DATE	May 2026
NEXT SCHEDULED REVIEW	May 2027
APPLIES TO	Glaxtons Consulting Limited, 3 More London Place, London SE1 2RE

1 Purpose

This policy ensures that changes to the services the Company provides, to its IT systems, and to the locations where Company or client data is stored or processed, are planned, assessed and communicated in a controlled manner.

2 Scope

This policy applies to material changes to Company services, IT systems and data processing locations.

3 Definitions

In this policy, "Company" means Glaxtons Consulting Limited, "Personnel" means employees, workers, contractors, consultants and temporary staff of the Company, and "client" means any current or prospective client, customer or partner of the Company.

4 Policy

4.1 Changes to services

Material planned changes to the services provided to a client are recorded and assessed for their impact on that client. Where a change is expected to affect a client within the following quarter, the client's designated contact is notified with reasonable advance notice appropriate to the nature of the change.

4.2 IT changes affecting data

Planned changes to IT systems that affect the storage, processing or security of Company or client data are subject to a documented change request, including a risk and data protection impact assessment, testing before deployment, a rollback plan, and approval by the Operations Director or the IT lead before implementation. Emergency changes follow an expedited process, with retrospective approval and review within five working days.

4.3 Changes to processing sites

Planned changes to the sites, facilities or cloud regions where Company or client data is stored or processed are assessed in advance for their effect on data location, applicable transfer mechanisms under the Data Protection and Compliance Policy, and physical and environmental security, and are communicated to affected clients ahead of implementation.

4.4 Change log

All changes falling within the scope of this policy are recorded in a central change log, including the nature of the change, its approval, the outcome of testing, and its implementation date, and are reviewed as part of the quarterly risk register review.

5 Alignment with client due diligence requests

This policy addresses the following reference points commonly raised in client and prospective client vendor due diligence and security assessments: V.RA-39, V.RA-40, V.RA-41. Where a client raises a due diligence question falling within this policy's scope, the relevant section of this policy may be used as the basis for the Company's response, subject to review by the Operations Director.

6 Roles and responsibilities

- The Operations Director approves in-scope changes and reviews the change log quarterly.
- The IT function carries out technical implementation, testing and rollback where required.
- Client-facing leads are responsible for communicating relevant changes to affected clients.

7 Non-compliance and exceptions

Breach of this policy may result in disciplinary action up to and including dismissal, and, in the case of a contractor, consultant or supplier, termination of the relevant engagement or contract. Any exception to this policy must be requested in writing, is subject to a documented risk assessment, and requires the approval of the Operations Director before it takes effect.

8 Related policies

- Information Security Policy
- Data Security Policy
- Data Protection and Compliance Policy
- Risk Assessment and Vulnerability Management Policy

9 Version history

VERSION	DATE	SUMMARY OF CHANGE	AUTHOR
6.0	May 2026	Scheduled annual review, reissued and approved by the Board.	Legal Department

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