CYBER SUB-COMMITTEE

Objectives

- To operate in accordance with the Terms of Reference
- To ensure the accurate, effective, efficient and timely administration of the Plan.

Aims in the next 12 months

- To prepare a Cyber / IT policy for the Plan (based on the NCSC 10 Principles)
- To review / update the existing Data Protection Policy
- To prepare a ready reckoner for all Trustees to outline actions to be taken in the event of a data breach
- To issue the updated GDPR / IT security questionnaire to all third parties involved with the Plan
- To identify an external independent party to review the Trustee's cyber readiness

TERMS OF REFERENCE

- 1. The Sub-Committee will comprise two members of the Board of Directors of AB InBev UK Pension Trust Ltd plus the AB InBev UK Pensions Manager.
- 2. The Sub-Committee shall have powers of delegated decision making subject to the restrictions set out below.
- 3. The responsibilities of the Sub-Committee are:
 - a. To ensure the Plan has a cyber policy that is reviewed at least annually
 - b. To ensure the Plan has a Data Protection policy that is reviewed at least annually
 - c. To ensure GDPR compliance of all third parties associated with the Plan who may have access to any personal data for any parts of the Plan's membership..
 - d. To identify gaps in the knowledge of the Trustee Board and arrange for appropriate training.
 - e. To monitor and review content of the IT policies of those third parties who provide significant services to the Plan.
 - f. To monitor and review the IT policy in terms of alignment with the Company's IT policy, the NCSC IT policy and any other relevant bodies.
- 4. Members of the Sub-Committee can communicate by e-mail and telephone in order to make decisions. Decisions can be made by a majority (i.e. by the agreement of two of the Sub-Committee members, one of whom must be the AB InBev Pensions Manager.

- 5. The Sub-Committee will hold bi-annual meetings and will extend invitations for Third Parties to attend as deemed necessary. They will undertake biennial site visits alongside the Admin sub-committee
- 6. Any meeting will have an agenda and papers at least 5 working days in advance and draft minutes 10 working days after.
- 7. The Sub-Committee may refer any decision back to the Trustee Board in circumstances where it feels it to be appropriate.
- 8. The Sub-Committee will make an annual report to the Trustee Board and any other time deemed necessary.
- 9. The Sub-Committee shall undertake an annual review of its objectives and terms of reference.