



SANCTIONS POLICY

CHANGE HISTORY

Date	Version	Created by	Approved By	Description of change
08/10/2024	1.0	Bharath S	Ashwin Khosla	Basic document outline and submitted for review

Purpose

The purpose of the Sanctions Policy is to outline the procedures at Veranda Learning to consistently and without bias deal with all reported InfoSec Policy violations.

Scope

The sanctions policy applies to the following personnel

- All Employees of Veranda Learning
- All Contractors of Veranda Learning

Background

Every organization must occasionally deal with policy violations (both intentional and unintentional). It is the responsibility of the organization to fairly and consistently resolve all complaints and reported violations after conducting a proper investigation.

Policy

Veranda Learning 's sanctions policy is aimed at taking appropriate action when non-compliance to a policy is reported. Each action is proportional to the severity, intent, and impact of the violation. Factors used to determine the disciplinary actions are

- Unintentional vs. Deliberate violation
- Good faith vs. Harmful intent
- Self- Reported or detected/caught by audit action etc.
- Potential risk to personnel
- Potential risk to information systems

In Veranda Learning following guidelines are used for sanctions

Severity of Violation	Disciplinary Action
Unintentional violation caused by carelessness lack of adequate training or human error	<ul style="list-style-type: none">• Mandatory remedial education course• Verbal or written warning
Violations attributed to poor job performance or failure to understand/follow policies	<ul style="list-style-type: none">• Written warning• Mandatory remedial education course
Intentional violation due to curiosity or failure to understand access/authorization	<ul style="list-style-type: none">• Final written warning• Mandatory remedial education course• Suspension• Termination depending on the circumstances
Intentional violations causing an employee or organizational harm	<ul style="list-style-type: none">• Termination

Other guidelines

- The mandatory remedial education course must be completed within 7 days of the issuance of the sanction.
- A subsequent violation after receiving a final written warning should result in termination.
- The sanctions imposed may be one or more from the above category. In addition to any sanctions imposed the employee may be reported to the appropriate law governing body and legal action will ensue.

Enforcement

The sanctions policy is generally enforced by the sanctions body. The body is comprised of CISO, COO and other senior or executive members

Validity and Document Management

The owner of this document is the management, who must check and, if necessary, update the document at least once every 12 months