



**Recite Me Ltd**

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| Last assessment    | 2026/08/03 |
| Next re-assessment | 2027/02/02 |

| A Security Governance |                                                                                                                                                     |                                                                                                                                                                                                                                                                       |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | Question                                                                                                                                            | Answer                                                                                                                                                                                                                                                                |
| A.1                   | Does your organisation conduct an annual independent information security review and act upon the findings?                                         | Yes                                                                                                                                                                                                                                                                   |
|                       | Answer notes:                                                                                                                                       | Cyber Essentials Plus onsite assessment: 09/04/2026 Penetration test conducted 31/12/2025 Recite Me are working towards ISO 27001, which will include external surveillance and certification audits                                                                  |
|                       | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                            |
| A.2                   | Does your organisation have an appointed person responsible for information security, such as a CISO?                                               | Yes                                                                                                                                                                                                                                                                   |
|                       | Answer notes:                                                                                                                                       | Recite Me has a dedicated Information Security and Data Protection Officer, responsible for maintaining our information security, business continuity and data protection frameworks and management systems.                                                          |
|                       | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                            |
| A.3                   | Does your organisation have a documented Cybersecurity Policy or Information Security Policy?                                                       | Yes                                                                                                                                                                                                                                                                   |
|                       | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                            |
|                       | Evidence:                                                                                                                                           | Information Security Policy                                                                                                                                                                                                                                           |
| A.4                   | Does your organisation have a formal policy on the use of mobile devices?                                                                           | Yes                                                                                                                                                                                                                                                                   |
|                       | Answer notes:                                                                                                                                       | High level references can be found in the security policy. A new mobile device policy is being drafted and reviewed for publishing.                                                                                                                                   |
|                       | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                            |
| A.5                   | Does your organisation have a formal policy for remote working that includes security?                                                              | Yes                                                                                                                                                                                                                                                                   |
|                       | Answer notes:                                                                                                                                       | High level references can be found in the security policy. A new remote working policy is being drafted and reviewed for publishing.                                                                                                                                  |
|                       | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                            |
| A.6                   | Does your organisation have a documented Acceptable Use Policy that outlines the rules for the acceptable use of company IT assets and information? | Yes                                                                                                                                                                                                                                                                   |
|                       | Answer notes:                                                                                                                                       | High level references can be found in the security policy. A new acceptable use policy is being drafted and reviewed for publishing. Further details are also published in our employee handbook, which is provided to new joiners when they first join the business. |
|                       | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                            |
| A.7                   | Does your organisation have a documented Information Classification Policy?                                                                         | Yes                                                                                                                                                                                                                                                                   |
|                       | Answer notes:                                                                                                                                       | Limited personal data is processed by Recite Me, as a Processor for our customers. The data that is processed is as instructed and is not stored as raw data, but as hashes instead. Our classification policy is attached but currently under review.                |
|                       | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                            |
|                       | Evidence:                                                                                                                                           | Data Classification Policy                                                                                                                                                                                                                                            |

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| A.8  | Does your organisation have a documented Access Control Policy?                                                              | Yes                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                | High level references can be found in the security policy. A new access control policy is being drafted and reviewed for publishing.                                                                                                                                                                                                                                              |
|      | Last modified:                                                                                                               | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                        |
| A.9  | Does your organisation have a policy governing the use of cloud services?                                                    | Yes                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                | High level references can be found in the security policy and supplier management procedure provided. The latter is being updated to include more information on cloud services.                                                                                                                                                                                                  |
|      | Last modified:                                                                                                               | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                        |
|      | Evidence:                                                                                                                    | <i>Supplier and Third-Party Management Policy</i>                                                                                                                                                                                                                                                                                                                                 |
| A.10 | Does your organisation have a Password Policy that is technically enforced throughout its IT estate?                         | Yes                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                | High level references can be found in the security policy. A new password policy is being drafted and reviewed for publishing. Our current controls for employee credentials are: Minimum 8 characters, no maximum Combination of uppercase, lowercase, number and symbol No simple or breached passwords Locked out after repeated attempts SSO used throughout using AD account |
|      | Last modified:                                                                                                               | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                        |
| A.11 | Does your organisation have a documented Backup Policy?                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                | Please refer to BCMS policy provided, which is being reviewed and updated.                                                                                                                                                                                                                                                                                                        |
|      | Last modified:                                                                                                               | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                        |
|      | Evidence:                                                                                                                    | <i>Business Continuity Policy</i>                                                                                                                                                                                                                                                                                                                                                 |
| A.12 | Does your organisation enforce a Clear Desk and Screen Policy?                                                               | Yes                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                | High level references can be found in the security policy. A new clear desk policy is being drafted and reviewed for publishing.                                                                                                                                                                                                                                                  |
|      | Last modified:                                                                                                               | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                        |
| A.13 | Does your organisation prevent the use of removable media, and is this enforced technically?                                 | Yes                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                | Enforced through Sophos installed on all devices - removable media is prohibited.                                                                                                                                                                                                                                                                                                 |
|      | Last modified:                                                                                                               | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                        |
| A.14 | If the use of removable media is not prohibited and enforced technically, is its use subject to other compensatory controls? | Not applicable                                                                                                                                                                                                                                                                                                                                                                    |
|      | Last modified:                                                                                                               | 2023/07/21                                                                                                                                                                                                                                                                                                                                                                        |
| A.15 | Are your organisation's information security policies accessible to all employees?                                           | Yes                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                | All policies and procedures are accessible on an internal shared drive. Specific elements are available to our customers via Risk Ledger or our Knowledge Base:<br><a href="https://knowledge.reciteme.com/knowledge/security-continuity-and-data-protection">https://knowledge.reciteme.com/knowledge/security-continuity-and-data-protection</a>                                |
|      | Last modified:                                                                                                               | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                        |
| A.16 | Are your organisation's information security policies reviewed and approved by senior management at least annually?          | Yes                                                                                                                                                                                                                                                                                                                                                                               |

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|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|      | Answer notes:                                                                                                                                                                             | Yes, all policies and procedures are reviewed and approved by senior management annually or upon significant change.                                                                                                                                                                                                                                                                                                                                               |     |
|      | Last modified:                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| A.17 | Has your organisation documented senior management roles and responsibilities for security within your organisation?                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |
|      | Answer notes:                                                                                                                                                                             | Please refer to our security policy attached.                                                                                                                                                                                                                                                                                                                                                                                                                      |     |
|      | Last modified:                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
|      | Evidence:                                                                                                                                                                                 | Information Security Policy                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |
| A.18 | Does your organisation include information security during the planning and delivery of projects?                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |
|      | Answer notes:                                                                                                                                                                             | Information security and data protection matters are considered during the planning and delivery of projects, new products and services, updates to existing products and services and any other areas where it might be necessary. This includes aspects such as risk assessments, DPIAs, supplier due diligence and other tools at Information Security's disposal.                                                                                              |     |
|      | Last modified:                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| A.19 | Does your organisation restrict employee access to business information based upon the principle of least privilege?                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |
|      | Answer notes:                                                                                                                                                                             | The least privilege principle is adopted and adhered to across the business.                                                                                                                                                                                                                                                                                                                                                                                       |     |
|      | Last modified:                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| A.20 | Does your organisation have an internal audit function that ensures information security requirements are being met by the business?                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |
|      | Answer notes:                                                                                                                                                                             | The Information Security and Data Protection Officer (ISDPO) is a qualified ISO 27001 Lead Auditor. An internal audit programme is being created to ensure these are carried out at least annually, as required under ISO 27001. The audits initially will be lead and conducted by the ISDPO but, over time, other employees will be trained as internal auditors to assist and conduct the audits, with the lead auditor overseeing and reviewing their reports. |     |
|      | Last modified:                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| A.21 | Does your organisation use a defined methodology to identify, assess, prioritise and track the treatment of security risks to closure?                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |
|      | Answer notes:                                                                                                                                                                             | The ISDPO is responsible for maintaining and conducting risk assessments. Recite Me follow a standard risk management framework and maintain a risk register, which is reviewed and updated at least annually or upon significant change. Operational risks are reported to senior management on a monthly basis.                                                                                                                                                  |     |
|      | Last modified:                                                                                                                                                                            | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| A.22 | Is information security and cyber risk reported to your organisation's board (or equivalent senior governing body) as part of formal risk reporting, with findings tracked at that level? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |
|      | Answer notes:                                                                                                                                                                             | The ISDPO is responsible for maintaining and conducting risk assessments. Recite Me follow a standard risk management framework and maintain a risk register, which is reviewed and updated at least annually or upon significant change. Operational risks are reported to senior management on a monthly basis.                                                                                                                                                  |     |
|      | Last modified:                                                                                                                                                                            | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| A.23 | Does your organisation have a formal confidentiality or non disclosure agreement in place for all staff, contractors and third parties?                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |
|      | Answer notes:                                                                                                                                                                             | A confidentiality agreement is included as a clause in our employment contracts.                                                                                                                                                                                                                                                                                                                                                                                   |     |
|      | Last modified:                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |
| A.24 | Does your organisation segregate duties to prevent unauthorised disclosure or access to information?                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes |

|      |                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                            | Due to the size of the company, segregation of duties is in place where possible and absolutely necessary. For example, financial sign-off over a certain amount require 2-3 sign-offs. Where it is not always possible at this time, in the case of security and data protection, the roles and responsibilities are documented and adhered to so that the DPO duties remain as objective as they can be. Similarly, internal audits will be conducted objectively by the ISDPO, with any findings against senior management or security being raised and documented. |
|      | Last modified:                                                                                                                                           | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| A.25 | Does your organisation have a defined process that is followed when a client contract is terminated that includes the secure destruction of client data? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Answer notes:                                                                                                                                            | Upon contract termination, all customer data is destroyed. Upon request, data will be returned to customers prior to destruction. No data is stored post contract termination, in line with our Processor obligations and responsibilities.                                                                                                                                                                                                                                                                                                                            |
|      | Last modified:                                                                                                                                           | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| A.26 | Does your organisation use threat intelligence to inform decisions about information security?                                                           | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Answer notes:                                                                                                                                            | Threat intelligence is received from a variety of sources, such as our investors, vulnerability platforms, global security bulletins and other sources. When necessary, this information is communicated to the relevant stakeholders for investigation and any subsequent action.                                                                                                                                                                                                                                                                                     |
|      | Last modified:                                                                                                                                           | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| B Security Certifications |                                                                                                                                                         |                                                                                                                                                                                                                                                                                   |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scoping question:         | [object Object]                                                                                                                                         | Answer: Yes                                                                                                                                                                                                                                                                       |
| Scoping notes:            | Cyber Essentials and Cyber Essentials Plus Recite Me are aligned to and working towards ISO 27001 certification, with the hope to achieve this in 2027. |                                                                                                                                                                                                                                                                                   |
|                           | Question                                                                                                                                                | Answer                                                                                                                                                                                                                                                                            |
| B.1                       | Is your organisation Cyber Essentials certified?                                                                                                        | Yes                                                                                                                                                                                                                                                                               |
|                           | Last modified:                                                                                                                                          | 2026/04/14                                                                                                                                                                                                                                                                        |
|                           | Evidence:                                                                                                                                               | <i>Recite Me - Cyber Essentials (April 2026-2027)</i>                                                                                                                                                                                                                             |
| B.2                       | Is your organisation Cyber Essentials Plus certified?                                                                                                   | Yes                                                                                                                                                                                                                                                                               |
|                           | Last modified:                                                                                                                                          | 2026/04/23                                                                                                                                                                                                                                                                        |
|                           | Evidence:                                                                                                                                               | <i>Recite Me - Cyber Essentials Plus (April 2026-2027)</i>                                                                                                                                                                                                                        |
| B.3                       | Is your organisation ISO 27001 certified?                                                                                                               | No                                                                                                                                                                                                                                                                                |
|                           | Answer notes:                                                                                                                                           | Our policies and procedures have been aligned to ISO 27001 and we are working towards certification. We hope to achieve this in early 2027, based on our current roadmap and goals. Our SoA will be uploaded here in the future, once published. Our security policy is attached. |
|                           | Last modified:                                                                                                                                          | 2026/07/09                                                                                                                                                                                                                                                                        |
|                           | Evidence:                                                                                                                                               | <i>Information Security Policy</i>                                                                                                                                                                                                                                                |
| B.4                       | Is your organisation aligned with the NIST Cybersecurity Framework?                                                                                     | No                                                                                                                                                                                                                                                                                |
|                           | Answer notes:                                                                                                                                           | Recite Me will be aligning with the ISO 27001 framework. However, we will be regularly reviewing changes to the NIST framework and guidance and will adapt controls as necessary, to ensure best practice.                                                                        |
|                           | Last modified:                                                                                                                                          | 2026/07/09                                                                                                                                                                                                                                                                        |

|     |                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| B.5 | Does your organisation store, process, transmit or otherwise have the ability to impact the security of cardholder data (CHD) or sensitive authentication data (SAD)?                                                              | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|     | Answer notes:                                                                                                                                                                                                                      | No card data is processed or stored                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|     | Last modified:                                                                                                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| B.6 | Has your organisation performed validation of compliance to the Payment Card Industry Data Security Standard (PCI DSS) v4 or above for your services or environments that impact cardholder data or sensitive authentication data? | Not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|     | Answer notes:                                                                                                                                                                                                                      | N/A - We don't process credit card data                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|     | Last modified:                                                                                                                                                                                                                     | 2026/01/29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| B.7 | Does your organisation have a defined process for managing and monitoring Third-Party Service Providers (TPSP) that provide services impacting your PCI DSS compliance?                                                            | Not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|     | Last modified:                                                                                                                                                                                                                     | 2026/01/29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| B.8 | Does your organisation have any other certifications or audit reports that cover information security (such as a SOC 2 report)?                                                                                                    | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|     | Answer notes:                                                                                                                                                                                                                      | Recite Me does not hold a SOC 2 attestation report. Recite Me is Cyber Essentials and Cyber Essentials Plus certified. As part of our 2026-2027 security roadmap, we are actively aligned with and working towards formal ISO 27001 certification, targeting achievement in 2027. We selected the ISO 27001 framework over SOC 2 for several strategic reasons: A globally recognised certification: Unlike SOC 2, which results in a point-in-time attestation report, ISO 27001 requires a rigorous internal and external audit cycle, resulting in an internationally recognised certificate. This is highly valued and sought after by our global enterprise-level customers. A scalable and integrated Management System: The ISO framework provides a granular, repeatable structure to document and maintain our Information Security Management System (ISMS). This allows us to integrate supplementary standards as Recite Me grows, such as ISO 27017 (Code of Practice for Cloud Services), ISO 27018 (Protecting Personal Data in the Cloud as a Processor), ISO 22301 (Business Continuity), and ISO 42001 (AI Management System). This ensures we manage a single compliance framework that all employees understand and adhere to. Continuous improvement: ISO standards are updated to reflect evolving industry best practices, ensuring our security posture remains mature and resilient against emerging threats. A fundamental requirement of the standard is to continuously improve, which we will do through internal and external audits, management reviews, feedback loop processes, and robust internal controls. Resource allocation: Implementing an ISO-based ISMS provides a long-term return on investment for our framework compliance by establishing a repeatable internal framework. Furthermore, as our Information Security and Data Protection Officer is a qualified ISO 27001 Lead Auditor, we are utilising that direct knowledge and experience to implement the ISO standards natively and correctly. Integrity: By pursuing a UKAS-accredited ISO certification, Recite Me ensures its controls are validated by internationally recognised certification bodies, avoiding the variability in audit quality sometimes observed with SOC 2 audits. By building this integrated management system, Recite Me guarantees robust, regularly audited controls that safeguard our operations while remaining agile enough to adopt future standards as the technological landscape evolves. |
|     | Last modified:                                                                                                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| C HR Security |                                                                            |        |
|---------------|----------------------------------------------------------------------------|--------|
|               | Question                                                                   | Answer |
| C.1           | Does your organisation perform background checks on staff and contractors? | Yes    |

|     |                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | Answer notes:                                                                                                                                              | Background checks are conducted, including employment, education, right to work and references. Where local law permits, criminal record checks will be conducted (e.g. DBS check in the UK).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|     | Last modified:                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| C.2 | Do employment contracts include consenting to all information security responsibilities in line with organisational policies and procedures?               | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|     | Last modified:                                                                                                                                             | 2023/07/31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| C.3 | Do employees and contractors receive an information security and data protection training programme?                                                       | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|     | Answer notes:                                                                                                                                              | Upon joining, employees receive a security induction advising them of the company policies and procedures, guidance and important security information. Alongside this, they also receive online courses they must complete within their first couple of weeks. On an annual basis, online awareness training will be conducted, which is mandatory for all employees. Regular security bulletins are published to all employees about policy updates, important security news within the company and in the wider public domain and any other information that may be pertinent to their roles and responsibilities. Additionally, the ISDPO will provide virtual courses which employees can attend to learn more about security and privacy topics, such as ISO 27001, social engineering, keeping safe online and so on. Recite Me also conduct phishing simulations on a periodic basis to ensure employees are familiar with phishing attempts, what to look for and how to report them correctly. Our training programme and content is reviewed and updated annually. |
|     | Last modified:                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| C.4 | Is there a formal disciplinary process for employees who have breached company policy (including any breaches of company security policy)?                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|     | Answer notes:                                                                                                                                              | Contained within the employee handbook. Non-compliance to any of our policies and procedures could result in disciplinary action, including dismissal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|     | Last modified:                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| C.5 | Does your organisation have arrangements in place to provide an alternate resource when a member of staff is not available for an extended period of time? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|     | Answer notes:                                                                                                                                              | Processes are in place for this scenario. In departments such as Customer Success and Sales, customer accounts will be transferred to another member of the team to assist. For support areas such as IT and Security, knowledge and information is spread to ensure there is not a single point of failure. Plans are being reviewed and updated to support our business continuity management system.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|     | Last modified:                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| D IT Operations |                                                                                                                                                                 |                                                     |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
|                 | Question                                                                                                                                                        | Answer                                              |
| D.1             | Does your organisation keep an up-to-date inventory of all IT assets with assigned owners?                                                                      | Yes                                                 |
|                 | Answer notes:                                                                                                                                                   | Assets are recorded and reviewed at least annually. |
|                 | Last modified:                                                                                                                                                  | 2026/07/09                                          |
| D.2             | Does your organisation keep an up-to-date inventory of all data repositories (such as databases) with assigned owners?                                          | Yes                                                 |
|                 | Last modified:                                                                                                                                                  | 2023/08/07                                          |
| D.3             | Does your organisation have a formal process to ensure that employees, contractors and third party users return all IT assets when they leave the organisation? | Yes                                                 |

|      |                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                       |     |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|      | Last modified:                                                                                                                                                                                        | 2023/07/26                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.4  | Does your organisation have a process for editing or removing employee access to systems and information (whether digital or physical) when they are changing role or leaving the organisation?       |                                                                                                                                                                                                                                                                                                                                                                                                       | Yes |
|      | Answer notes:                                                                                                                                                                                         | If employees move roles, access is updated accordingly and any unnecessary access removed. When an employee leaves, all their accounts are disabled close of business on the day they leave to prevent any unauthorised access. If an employee is leaving with immediate effect, then access is terminated at that point.                                                                             |     |
|      | Last modified:                                                                                                                                                                                        | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.5  | Does your organisation have a documented process for provisioning user accounts for all of your IT services that includes appropriate authorisation and secure account creation with unique user IDs? |                                                                                                                                                                                                                                                                                                                                                                                                       | Yes |
|      | Answer notes:                                                                                                                                                                                         | All users are provisioned unique accounts upon joining. No shared accounts are used.                                                                                                                                                                                                                                                                                                                  |     |
|      | Last modified:                                                                                                                                                                                        | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.6  | Does your organisation enforce multi-factor authentication on all remotely accessible services?                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                       | Yes |
|      | Answer notes:                                                                                                                                                                                         | MFA is in place and enforced where possible. Where it isn't possible to enforce, it is policy to ensure it is enabled and used.                                                                                                                                                                                                                                                                       |     |
|      | Last modified:                                                                                                                                                                                        | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.7  | Are privileged access accounts, and accounts of a sensitive nature, subject to a higher level of authorisation than user accounts before being provisioned?                                           |                                                                                                                                                                                                                                                                                                                                                                                                       | Yes |
|      | Answer notes:                                                                                                                                                                                         | Administrator accounts must be approved by the appropriate line manager, which is typically a member of our Technology team. Where necessary, Information Security may be involved to provide additional approval.                                                                                                                                                                                    |     |
|      | Last modified:                                                                                                                                                                                        | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.8  | Does your organisation regularly audit employee access rights for all IT services (whether internal or third party based)?                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                       | Yes |
|      | Answer notes:                                                                                                                                                                                         | Standard accounts are reviewed on a 6 monthly basis Privileged accounts are reviewed on a 3 monthly basis Security will work with the Technology teams to get access lists and review them with the appropriate line managers / head of departments / software owners.                                                                                                                                |     |
|      | Last modified:                                                                                                                                                                                        | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.9  | How many access audits does your organisation conduct each year, for regular employee accounts?                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                       | 2   |
|      | Last modified:                                                                                                                                                                                        | 2024/08/13                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.10 | How many access audits does your organisation conduct each year, for privileged employee accounts?                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                       | 4   |
|      | Last modified:                                                                                                                                                                                        | 2024/08/13                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.11 | Does your organisation use Privileged Access Management controls to securely manage the use of privileged accounts for system administration?                                                         |                                                                                                                                                                                                                                                                                                                                                                                                       | Yes |
|      | Answer notes:                                                                                                                                                                                         | Additional approval required from the ISDPO for privileged access. Alerts in place, which are sent to InfoSec, for any change in admin roles or users. These will be investigated and acted upon. Those with privileged access are instructed to not use credentials for certain functions (e.g. web-browsing) and the accounts are restricted to specific functions as best as technically possible. |     |
|      | Last modified:                                                                                                                                                                                        | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                            |     |
| D.12 | Do all of your organisations systems automatically lock after a short period of inactivity (requiring re-authentication)?                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                       | Yes |

|      |                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|      | Last modified:                                                                                                                                                                                                      | 2025/07/23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.13 | For how many minutes does a user have to be inactive before the system is locked?                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 10  |
|      | Answer notes:                                                                                                                                                                                                       | 10 minutes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
|      | Last modified:                                                                                                                                                                                                      | 2023/07/31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.14 | Does your organisation use/provision a password manager to ensure passwords are of the required complexity and only used once?                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |
|      | Answer notes:                                                                                                                                                                                                       | All users have Google Password Manager available to them as default, based on their Google accounts. Recite Me instructs users to use this password manager for day-to-day work use, to ensure password security but also to flag if passwords / accounts are ever compromised. In addition, some employees in support functions use separate password manager utilities, such as 1Password, but they are instructed to have separate personal and work vaults. Recite Me are exploring a company wide password manager as an option in the future. |     |
|      | Last modified:                                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.15 | Has your organisation removed local administrator rights on all end point devices for all employees that do not require it?                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |
|      | Last modified:                                                                                                                                                                                                      | 2023/08/07                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.16 | Does your organisation operate a secure configuration process to reduce any unnecessary vulnerabilities in your IT systems including servers, endpoints, network devices and systems hosted in a cloud environment? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |
|      | Answer notes:                                                                                                                                                                                                       | All devices are setup based on a similar image. InfoSec can approve / reject devices into our estate and vulnerability scanner when being configured by our Technology team. All company devices have AV and vulnerability scanning in place which ensures they are up-to-date with the latest signatures and patches. Patches are rolled out automatically or can be pushed out via our vulnerability management software.                                                                                                                         |     |
|      | Last modified:                                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.17 | Do all systems (such as network devices) have their default credentials changed on installation or provision?                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |
|      | Last modified:                                                                                                                                                                                                      | 2023/08/04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.18 | Does your organisation have a formal change management process that gives consideration to information security?                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |
|      | Answer notes:                                                                                                                                                                                                       | Change management is in line with ISO 27001 requirements. Changes must be approved and have rollback plans in place before commencing. Major changes are documented via change forms and recorded on the change register. General changes, such as product releases, code releases, etc, are tracked via Jira and Github tickets, so do not need separate change control forms.                                                                                                                                                                     |     |
|      | Last modified:                                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.19 | Does your organisation use anti-malware controls, such as an Endpoint Detection and Response (EDR) solution, to protect all of its endpoints and internal IT infrastructure?                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |
|      | Answer notes:                                                                                                                                                                                                       | Sophos is in place across all company devices. Signatures are updated regularly and scans are automatically initiated on a regular basis to ensure devices are protected. Users can also self-initiate scans for malware or Potentially Unwanted Applications (PUA).                                                                                                                                                                                                                                                                                |     |
|      | Last modified:                                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| D.20 | Does your organisation have procedures in place to control the installation of software on IT production systems (such as servers)?                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |



|      |                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                      | Only approved accounts with privileged access are able to install software. Standard / approved software is deployed and updated via NinjaOne endpoint management.                                                                                                                                                                                                                                                                  |
|      | Last modified:                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.21 | Does your organisation have procedures in place to control the installation of software on user endpoint systems?                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|      | Answer notes:                                                                                                                                      | Software installations are limited to Administrators. Requests for software must be approved. Once approved, admins must install via remote connection or in person (if in the office). We use endpoint management software (NinjaOne, Sophos) to monitor for unapproved software. Software that is not approved must have due diligence carried out first by Information Security, in line with our supplier management procedure. |
|      | Last modified:                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.22 | Does your organisation enforce full-disk encryption on all organisation-provisioned endpoint devices?                                              | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|      | Answer notes:                                                                                                                                      | Bitlocker in place on all devices.                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Last modified:                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.23 | Can your organisation perform a remote wipe on all organisation-provisioned endpoint devices?                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|      | Last modified:                                                                                                                                     | 2026/01/15                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.24 | Does your organisation allow staff to access company data or services from employee-owned devices?                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|      | Answer notes:                                                                                                                                      | This is restricted to personal mobile devices only, for access to company email, communication platforms and ticket management software only. No access to corporate network, databases or production environments is possible from a personal device.                                                                                                                                                                              |
|      | Last modified:                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.25 | Does your organisation enforce equivalent technical security controls on BYOD endpoint devices before allowing access to company data or services? | No                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Answer notes:                                                                                                                                      | Mobile phones are only authorised to use company email, communication platforms and ticket management software. Accounts can be disabled if any non-compliance or compromise is suspected. MDM and MAM are being considered as potential controls in the future to enhance our security posture, once the appropriate risk assessments and gap analysis are conducted and reviewed.                                                 |
|      | Last modified:                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.26 | Can your organisation perform a remote wipe of organisation data on all BYOD endpoint devices?                                                     | No                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Answer notes:                                                                                                                                      | However, accounts can be disabled if any non-compliance or compromise is suspected to prevent further use. As SSO is used, suspending the account will prevent any further usage across other internal tools.                                                                                                                                                                                                                       |
|      | Last modified:                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.27 | Does your organisation encrypt client data on its IT systems using appropriate cryptographic standards?                                            | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|      | Answer notes:                                                                                                                                      | All data is encrypted in transit using HTTPS/TLS 1.2 or higher. Data at rest is also encrypted using AES-256 or equivalent standards.                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                     | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                          |
| D.28 | Which countries or jurisdictions is client data stored, processed, or transferred to or through?                                                   | United Kingdom of Great Britain and Northern Ireland, United States of America, Australia, Ireland                                                                                                                                                                                                                                                                                                                                  |

|      |                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                             |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                                                                               | Please refer to sub-processor list for further information: <a href="https://knowledge.reciteme.com/knowledge/recite-me-sub-processors">https://knowledge.reciteme.com/knowledge/recite-me-sub-processors</a> . Please note that hosting locations will only be used for country specific customers (e.g. UK customers will only be hosted in the UK, US customers in the USA, etc)                         |
|      | Last modified:                                                                                                                                                                                              | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                  |
| D.29 | Does your organisation ensure that all IT systems are regularly patched with security patches in line with vendor recommendations, including end point devices, servers, network devices, and applications? | Yes                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Answer notes:                                                                                                                                                                                               | Please refer to our patch management procedure provided                                                                                                                                                                                                                                                                                                                                                     |
|      | Last modified:                                                                                                                                                                                              | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Evidence:                                                                                                                                                                                                   | <i>Patch Management Procedure</i>                                                                                                                                                                                                                                                                                                                                                                           |
| D.30 | Does your organisation use any applications, operating systems or hardware that are no longer supported by the vendor and no longer receive security updates?                                               | No                                                                                                                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                               | Any software or operating system (OS) reaching end of life / end of support will be decommissioned and an alternative software / OS used or, if Long Term Support is available, this will be taken while a transition takes place or LTS finishes. For hardware reaching end of life, it will be replaced prior to the deadline with supported hardware. Any EoL hardware will then be wiped and destroyed. |
|      | Last modified:                                                                                                                                                                                              | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                  |
| D.31 | Does your organisation ensure that all used digital media (that may have stored data) is disposed of securely and are certificates of destruction obtained?                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Answer notes:                                                                                                                                                                                               | Hardware or media which is no longer needed is securely destroyed and certificates of destruction will be obtained.                                                                                                                                                                                                                                                                                         |
|      | Last modified:                                                                                                                                                                                              | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                  |
| D.32 | Does your organisation take regular immutable backups of its digital production data in line with current best practise guidelines?                                                                         | Yes                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Answer notes:                                                                                                                                                                                               | Please refer to business continuity policy for further details.                                                                                                                                                                                                                                                                                                                                             |
|      | Last modified:                                                                                                                                                                                              | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Evidence:                                                                                                                                                                                                   | <i>Business Continuity Policy</i>                                                                                                                                                                                                                                                                                                                                                                           |
| D.33 | Does your organisation encrypt the backups using appropriate cryptographic standards to prevent unauthorised access to the backup data?                                                                     | Yes                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Answer notes:                                                                                                                                                                                               | Data at rest is also encrypted using AES-256 or equivalent standards.                                                                                                                                                                                                                                                                                                                                       |
|      | Last modified:                                                                                                                                                                                              | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                  |
| D.34 | Does your organisation regularly test backups to ensure their effectiveness?                                                                                                                                | Yes                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Answer notes:                                                                                                                                                                                               | Failover tests are conducted at least annually.                                                                                                                                                                                                                                                                                                                                                             |
|      | Last modified:                                                                                                                                                                                              | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                  |
| D.35 | Does your organisation use opportunistic TLS on all email services and are you able to apply enforced TLS to specific domains on request?                                                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Answer notes:                                                                                                                                                                                               | Opportunistic TLS by default. We could explore enforced TLS on a case-by-case basis with customers, but it is not typically needed or requested by customers, based on the services provided and the content discussed over email not being of a sensitive nature or containing large volumes of personal data.                                                                                             |
|      | Last modified:                                                                                                                                                                                              | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                  |
| D.36 | Has your organisation implemented SPF, DMARC, and DKIM for all of its email services?                                                                                                                       | Yes                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Last modified:                                                                                                                                                                                              | 2023/08/07                                                                                                                                                                                                                                                                                                                                                                                                  |

|      |                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| D.37 | Does your organisation prevent unauthorised transfer of data via email, web browsers, or other data transfer mechanisms?            | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                       | USB Removable Media devices are blocked As Recite Me does not process personal data for our customers to the degree it may be processed by other SaaS platforms, this risk is quite low. There is little data to transfer via email, web browsers or SFTP. The data we do hold, such as in our CRM system, is limited in it's access and cannot be easily exported / downloaded. Monitoring is in place for large volumes of data being downloaded and will be investigated. |
|      | Last modified:                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| D.38 | Does your organisation use email security controls to detect, filter or quarantine malicious inbound email before it reaches users? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                       | Mail gateway in place via Google, with quarantine measures and filters in place.                                                                                                                                                                                                                                                                                                                                                                                             |
|      | Last modified:                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| E Software Development |                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scoping question:      | Does your organisation develop any software or apps?                                                                                                      | Answer: Yes                                                                                                                                                                                                                                                                                                                                                              |
| Scoping notes:         | Recite Me have a number of accessibility platforms and services which we supply to our customers.                                                         |                                                                                                                                                                                                                                                                                                                                                                          |
|                        | <b>Question</b>                                                                                                                                           | <b>Answer</b>                                                                                                                                                                                                                                                                                                                                                            |
| E.1                    | Does your organisation control access to program source code in a secure manner?                                                                          | Yes                                                                                                                                                                                                                                                                                                                                                                      |
|                        | Answer notes:                                                                                                                                             | Source code held in Github, restricted to developers only.                                                                                                                                                                                                                                                                                                               |
|                        | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                               |
| E.2                    | Does your organisation have a documented and approved software development life-cycle (SDLC) process that includes security input?                        | Yes                                                                                                                                                                                                                                                                                                                                                                      |
|                        | Answer notes:                                                                                                                                             | Please refer to the attached SDLC policy                                                                                                                                                                                                                                                                                                                                 |
|                        | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                               |
|                        | Evidence:                                                                                                                                                 | <i>Software Development Lifecycle Policy</i>                                                                                                                                                                                                                                                                                                                             |
| E.3                    | Does your organisation develop apps and systems using security best practice (for example, by following the OWASP secure coding practices)?               | Yes                                                                                                                                                                                                                                                                                                                                                                      |
|                        | Answer notes:                                                                                                                                             | OWASP Top 10 is included in our software development lifecycle policy. Further training and guidance is provided on best practice, to ensure data protection by design and default. The ISDPO works closely with the Product teams to ensure that any new or updated functionality or products consider security and data protection requirements from the design phase. |
|                        | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                               |
| E.4                    | Does your organisation validate all data inputs and outputs to and from its apps?                                                                         | Yes                                                                                                                                                                                                                                                                                                                                                                      |
|                        | Last modified:                                                                                                                                            | 2023/08/07                                                                                                                                                                                                                                                                                                                                                               |
| E.5                    | Does your organisation conduct threat modelling throughout the SDLC, incorporating an up to date understanding of threats, for each app or system build?  | Yes                                                                                                                                                                                                                                                                                                                                                                      |
|                        | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                               |
| E.6                    | Do all of your organisation's apps and systems use industry best practice for authentication, including storing all user passwords as appropriate hashes? | Yes                                                                                                                                                                                                                                                                                                                                                                      |
|                        | Answer notes:                                                                                                                                             | Toolbar - N/A as no user roles or authentication required.                                                                                                                                                                                                                                                                                                               |
|                        | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                               |

|      |                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                        |  |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|      | In relation to:                                                                                                                                           | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                                                                           |  |
| E.6  | Do all of your organisation's apps and systems use industry best practice for authentication, including storing all user passwords as appropriate hashes? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Answer notes:                                                                                                                                             | We offer the user ability to create their own username/password combination to login or use SSO with Google or Microsoft                                                                                                                                                                                                                                                                                               |  |
|      | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                             |  |
|      | In relation to:                                                                                                                                           | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                                                                       |  |
| E.6  | Do all of your organisation's apps and systems use industry best practice for authentication, including storing all user passwords as appropriate hashes? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Answer notes:                                                                                                                                             | We offer the user ability to create their own username/password combination to login or use SSO with Google or Microsoft                                                                                                                                                                                                                                                                                               |  |
|      | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| E.7  | Does your organisation conduct appropriate security testing as part of your development lifecycle?                                                        | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Answer notes:                                                                                                                                             | SAST and peer review is in place. As part of each release, QA must take place and be signed off before any branches can be merged and pushed to Production from the test environment. In addition, Recite Me get an independant and approved vendor to conduct application and infrastructure penetration tests on at least an annual basis. These are conducted against each application and the full infrastructure. |  |
|      | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| E.8  | Does your organisation segregate development environments from any testing or production environments?                                                    | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Answer notes:                                                                                                                                             | Logically separated                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| E.9  | Does your organisation use dummy test data when undergoing testing of systems (and not live production data)?                                             | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Answer notes:                                                                                                                                             | Test data is used by default, unless a customer instructs us to use live data. Any live data used will be wiped once testing is completed.                                                                                                                                                                                                                                                                             |  |
|      | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| E.10 | Does your organisation ensure that all apps that it builds are maintained with regular security patches?                                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Answer notes:                                                                                                                                             | Whilst our applications are developed in-house, any relevant patches or updates are regularly tested and released.                                                                                                                                                                                                                                                                                                     |  |
|      | Last modified:                                                                                                                                            | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| E.11 | Does your organisation conduct regular penetration tests of any apps or systems that it develops?                                                         | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Answer notes:                                                                                                                                             | Recite Me get an independant and approved vendor to conduct application and infrastructure penetration tests on at least an annual basis. These are conducted against each application and the full infrastructure.                                                                                                                                                                                                    |  |
|      | Last modified:                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| E.12 | Does your organisation ensure that appropriate logging and monitoring is in place for all apps or systems it develops?                                    | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Last modified:                                                                                                                                            | 2023/08/07                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| E.13 | Is this logging and monitoring used to detect unauthorised changes to applications or system components?                                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|      | Last modified:                                                                                                                                            | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                             |  |

|      |                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                   |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E.14 | Is your organisation able to demonstrate the composition and provenance of software it develops (including third-party and open-source components)? | Yes                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                       | Recite Me can provide information on how the applications are developed and composed, upon request. At present, we do not have a documented SBOM we can proactively provide to customers. However, this is being discussed and considered.                                                                                                                        |
|      | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                                        |
| E.15 | Does your organisation continuously monitor all software components for vulnerabilities?                                                            | Yes                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                       | Between our vulnerability management software, vulnerability monitoring portals and alerts / bulletins from approved sources, Recite Me continuously monitors and addresses vulnerabilities in our estate and applications, as and when they may occur. These are then remediated as required, or mitigations may be put in place if remediation is not possible. |
|      | Last modified:                                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                                        |
| E.16 | Does your organisation provide a clear way for third parties to report security vulnerabilities in your software, products or services?             | No                                                                                                                                                                                                                                                                                                                                                                |
|      | Answer notes:                                                                                                                                       | Whilst we accept any feedback or vulnerability concerns from our customers via our Customer Success team, we do not currently have a public vulnerability disclosure process. If anyone wishes to disclose a potential vulnerability, these can email in and we will investigate it but there is no formal bug bounty or disclosure process in place.             |
|      | Last modified:                                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                        |
| E.17 | Does your organisation control and authorise all access to data and services in your software, products or services?                                | Yes                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                       | RBAC in place                                                                                                                                                                                                                                                                                                                                                     |
|      | Last modified:                                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                        |
| E.18 | Are service credentials for your software, products or services rotated regularly, and can they be revoked promptly if compromised?                 | Yes                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                        |
| E.19 | Does your organisation implement role-based access controls, based on the principle of least privilege, in your software, products or services?     | Yes                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                        |
| E.20 | Does your organisation enforce a modern password policy for user access to your software, products or services?                                     | Yes                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                       | Internal systems: authentication / SSO in place Toolbar: N/A, as no authentication to use the toolbar required Checker / PDF Remediation: We offer the user ability to create their own username/password combination to login or use SSO with Google or Microsoft                                                                                                |
|      | Last modified:                                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                        |
| E.21 | Does your organisation enforce multi-factor authentication (MFA) for user access to your software, products or services?                            | Yes                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                       | Internal systems: enforced MFA in place Toolbar: N/A, as no authentication to use the toolbar required Checker / PDF Remediation: We support customers implementing MFA from their own AD                                                                                                                                                                         |
|      | Last modified:                                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                        |
| E.22 | Does your organisation support Single Sign-On (SSO) or another federated identity mechanism for your software, products or services?                | Yes                                                                                                                                                                                                                                                                                                                                                               |

|      |                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                              | Internal systems: SSO in place Toolbar: N/A, as no authentication to use the toolbar required Checker / PDF Remediation: We offer the user ability to create their own username/password combination to login or use SSO with Google or Microsoft                                                                                                                                                                                                                                                                           |
|      | Last modified:                                                                                                                             | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| E.23 | Does administrative or privileged access within your software, products or services carry additional controls beyond standard user access? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Answer notes:                                                                                                                              | Toolbar: N/A, as no authentication required Checker / PDF Remediation: We offer three basic roles that correspond to the editing & viewing actions the user take take. Admin: Has full rights across the platform; can add/remove users & domains, run scans and change domain settings. Editor: Has rights to view scan information, but can also edit scan settings. They do not have the ability to edit users. Viewer: Only has rights to view scan information; They do not have the ability to edit users or domains. |
|      | Last modified:                                                                                                                             | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| F Network & Cloud Security |                                                                                                                         |             |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------|-------------|
| Scoping question:          | Does your organisation run any of its own servers, networks or cloud systems?                                           | Answer: Yes |
| Scoping notes:             | Recite Me maintain our infrastructure on an approved third-party cloud hosted environment.                              |             |
|                            | Question                                                                                                                | Answer      |
| F.1                        | Are all ingress and egress points for traffic through your network or cloud environment protected by firewalls?         | Yes         |
|                            | Last modified:                                                                                                          | 2023/08/04  |
| F.2                        | Were the firewalls implemented using a deny all policy, with rules built around your organisation's requirements?       | No          |
|                            | Last modified:                                                                                                          | 2023/08/04  |
| F.3                        | Does your organisation review its firewall rules at least annually?                                                     | Yes         |
|                            | Last modified:                                                                                                          | 2023/08/07  |
| F.4                        | Does your organisation have web application firewalls (WAFs) implemented to protect web applications?                   | Yes         |
|                            | Last modified:                                                                                                          | 2023/08/07  |
| F.5                        | Were the WAFs implemented with rulesets that have been built or tailored to your organisation's requirements?           | Yes         |
|                            | Last modified:                                                                                                          | 2023/08/07  |
| F.6                        | Does your organisation review its WAF rules at least annually?                                                          | Yes         |
|                            | Last modified:                                                                                                          | 2023/08/07  |
| F.7                        | Has your organisation appropriately implemented segmentation or segregation in your networks and/or cloud environments? | Yes         |
|                            | Last modified:                                                                                                          | 2026/08/03  |
| F.8                        | Does your organisation place all publicly accessible services in isolated network DMZs (or separate subnets)?           | Yes         |
|                            | Last modified:                                                                                                          | 2023/08/07  |

|      |                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                              |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| F.9  | Does your organisation have any controls implemented to protect it against Denial of Service (and Distributed Denial of Service) attacks?                                                      | Yes                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                  | In place using Cloudflare firewalls.                                                                                                                                                                                                                                                                         |
|      | Last modified:                                                                                                                                                                                 | 2026/07/10                                                                                                                                                                                                                                                                                                   |
| F.10 | Does your organisation secure and encrypt remote connections to its network or environment using an appropriate control/protocol (for example, by using VPNs or SSH connections)?              | Yes                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                  | Both SSH and VPNs are used for these connections.                                                                                                                                                                                                                                                            |
|      | Last modified:                                                                                                                                                                                 | 2026/07/10                                                                                                                                                                                                                                                                                                   |
| F.11 | Does your organisation secure and encrypt all data transfers using an appropriate control/protocol (for example, SFTP, HTTPS), and are all data transfers subject to review and authorisation? | Yes                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                  | All data is encrypted in transit using HTTPS/TLS 1.2 or higher. Data at rest is also encrypted using AES-256 or equivalent standards. There is little to no data transferred via other means to Recite Me, as we don't process data in that manner. Therefore, the use of SFTP is not relevant at this time. |
|      | Last modified:                                                                                                                                                                                 | 2026/07/10                                                                                                                                                                                                                                                                                                   |
| F.12 | Does your organisation encrypt all data in transit as it flows between internal components within your services (for example, between application servers and databases)?                      | Yes                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                  | All data is encrypted in transit using HTTPS/TLS 1.2 or higher. Data at rest is also encrypted using AES-256 or equivalent standards.                                                                                                                                                                        |
|      | Last modified:                                                                                                                                                                                 | 2026/08/03                                                                                                                                                                                                                                                                                                   |
| F.13 | Does your organisation encrypt all client data at rest by default in the product or service you provide to clients, including any metadata derived from that data?                             | Yes                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                  | All data is encrypted in transit using HTTPS/TLS 1.2 or higher. Data at rest is also encrypted using AES-256 or equivalent standards.                                                                                                                                                                        |
|      | Last modified:                                                                                                                                                                                 | 2026/08/03                                                                                                                                                                                                                                                                                                   |
| F.14 | Does your organisation manage and control the use of, and access to, any cryptographic keys?                                                                                                   | Yes                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                  | Encryption keys are securely managed on our servers with restricted access to authorised personnel only. While we do not currently use a dedicated KMS or HSM, this is under review as part of our security roadmap.                                                                                         |
|      | Last modified:                                                                                                                                                                                 | 2026/07/10                                                                                                                                                                                                                                                                                                   |
| F.15 | Does your organisation enforce multi-factor authentication for all remote access to its network and cloud environments?                                                                        | Yes                                                                                                                                                                                                                                                                                                          |
|      | Answer notes:                                                                                                                                                                                  | MFA is enforced.                                                                                                                                                                                                                                                                                             |
|      | Last modified:                                                                                                                                                                                 | 2026/07/10                                                                                                                                                                                                                                                                                                   |
| F.16 | Does your organisation keep a list of approved network connections (such as site to site VPNs) between your corporate network and third parties?                                               | No                                                                                                                                                                                                                                                                                                           |
|      | Answer notes:                                                                                                                                                                                  | This is not applicable, as we do not have any connections of this nature between us and third parties and / or customers.                                                                                                                                                                                    |
|      | Last modified:                                                                                                                                                                                 | 2026/07/10                                                                                                                                                                                                                                                                                                   |
| F.17 | Is each of the approved network connections subject to a risk assessment?                                                                                                                      | Not applicable                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                                                 | 2025/02/03                                                                                                                                                                                                                                                                                                   |
| F.18 | Is each of the approved network connections subject to regular review?                                                                                                                         | Not applicable                                                                                                                                                                                                                                                                                               |

|      |                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                 |     |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|      | Last modified:                                                                                                                                                                                                         | 2025/02/14                                                                                                                                                                                                                                                                                                      |     |
| F.19 | Does your organisation conduct regular automated vulnerability scans of its public facing IT infrastructure and remediate any findings?                                                                                |                                                                                                                                                                                                                                                                                                                 | Yes |
|      | Answer notes:                                                                                                                                                                                                          | Please refer to our patch management procedure for further details.                                                                                                                                                                                                                                             |     |
|      | Last modified:                                                                                                                                                                                                         | 2026/07/10                                                                                                                                                                                                                                                                                                      |     |
|      | Evidence:                                                                                                                                                                                                              | Patch Management Procedure                                                                                                                                                                                                                                                                                      |     |
| F.20 | How many external automated vulnerability scans does your organisation conduct each year?                                                                                                                              |                                                                                                                                                                                                                                                                                                                 | 12  |
|      | Last modified:                                                                                                                                                                                                         | 2024/08/13                                                                                                                                                                                                                                                                                                      |     |
| F.21 | Does your organisation conduct regular automated vulnerability scans of its internal IT infrastructure and remediate any findings?                                                                                     |                                                                                                                                                                                                                                                                                                                 | Yes |
|      | Answer notes:                                                                                                                                                                                                          | Please refer to our patch management procedure for further details.                                                                                                                                                                                                                                             |     |
|      | Last modified:                                                                                                                                                                                                         | 2026/07/10                                                                                                                                                                                                                                                                                                      |     |
| F.22 | How many internal automated vulnerability scans does your organisation conduct each year?                                                                                                                              |                                                                                                                                                                                                                                                                                                                 | 52  |
|      | Last modified:                                                                                                                                                                                                         | 2025/02/03                                                                                                                                                                                                                                                                                                      |     |
| F.23 | Does your organisation conduct regular penetration tests of its public facing IT infrastructure?                                                                                                                       |                                                                                                                                                                                                                                                                                                                 | Yes |
|      | Answer notes:                                                                                                                                                                                                          | These are conducted annually by an approved third-party vendor. Executive summaries of pentest reports and the associated corrective actions are available to prospective and existing customers upon request under NDA.                                                                                        |     |
|      | Last modified:                                                                                                                                                                                                         | 2026/07/10                                                                                                                                                                                                                                                                                                      |     |
| F.24 | Does your organisation conduct regular penetration tests of its internal systems where the test assumes perimeter controls have been compromised?                                                                      |                                                                                                                                                                                                                                                                                                                 | No  |
|      | Answer notes:                                                                                                                                                                                                          | Currently, these types of tests are not conducted. Our current vendor uses the grey box methodology, so they have the necessary IPs / URLs and credentials and see what vulnerabilities or security concerns they can find.                                                                                     |     |
|      | Last modified:                                                                                                                                                                                                         | 2026/07/10                                                                                                                                                                                                                                                                                                      |     |
| F.25 | Does your organisation have processes in place to triage and remediate identified vulnerabilities by inputting them into the relevant workflows?                                                                       |                                                                                                                                                                                                                                                                                                                 | Yes |
|      | Answer notes:                                                                                                                                                                                                          | Upon a vulnerability being discovered or a pentest report identifying findings, these are documented and tickets raised to the Development team for investigation and remediation. Where remediation is not possible, mitigations will be documented and put in place to lower the risk to an acceptable level. |     |
|      | Last modified:                                                                                                                                                                                                         | 2026/07/10                                                                                                                                                                                                                                                                                                      |     |
| F.26 | Has your organisation implemented any network or cloud monitoring controls such as Intrusion Detection Systems (IDS), Intrusion Prevention Systems (IPS), or Security Information and Event Management (SIEM) systems? |                                                                                                                                                                                                                                                                                                                 | Yes |
|      | Answer notes:                                                                                                                                                                                                          | IDS & IPS implemented SIEM capabilities is on the information security roadmap                                                                                                                                                                                                                                  |     |
|      | Last modified:                                                                                                                                                                                                         | 2026/01/15                                                                                                                                                                                                                                                                                                      |     |
| F.27 | Does your organisation have defined processes in place to ensure that all security alerts from logging and monitoring solutions are reviewed and actioned as necessary?                                                |                                                                                                                                                                                                                                                                                                                 | Yes |
|      | Answer notes:                                                                                                                                                                                                          | Alerts come into Information Security for investigation and remediation. Alerts include potential spoofing and phishing, as well as potential data loss concerns.                                                                                                                                               |     |
|      | Last modified:                                                                                                                                                                                                         | 2026/07/10                                                                                                                                                                                                                                                                                                      |     |



|      |                                                                                                                                                                                                                         |                                                                                                                                                                         |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| F.28 | Does your organisation monitor the capacity of its systems processing client information to make sure they are able to cope with load?                                                                                  | Yes                                                                                                                                                                     |
|      | Answer notes:                                                                                                                                                                                                           | We do monitor the capacity of our systems. Due to the products we offer and how they are used by our customers, we have an uptime SLA of 99.9%                          |
|      | Last modified:                                                                                                                                                                                                          | 2026/07/10                                                                                                                                                              |
| F.29 | Does your organisation record and store user activity logs for all cloud environments, networks and associated services?                                                                                                | Yes                                                                                                                                                                     |
|      | Last modified:                                                                                                                                                                                                          | 2023/08/07                                                                                                                                                              |
| F.30 | For how many months does your organisation store its user activity logs?                                                                                                                                                | 12                                                                                                                                                                      |
|      | Last modified:                                                                                                                                                                                                          | 2023/08/07                                                                                                                                                              |
| F.31 | Does your organisation record and store the logs of root/super user/ administrator actions for all cloud environments, networks and associated services?                                                                | Yes                                                                                                                                                                     |
|      | Last modified:                                                                                                                                                                                                          | 2023/08/07                                                                                                                                                              |
| F.32 | For how many months does your organisation store its root/super-user/administrator logs?                                                                                                                                | 12                                                                                                                                                                      |
|      | Last modified:                                                                                                                                                                                                          | 2023/08/07                                                                                                                                                              |
| F.33 | Are all logs stored on a secure/hardened server that is logically separate from the systems being logged?                                                                                                               | Yes                                                                                                                                                                     |
|      | Last modified:                                                                                                                                                                                                          | 2023/08/07                                                                                                                                                              |
| F.34 | Does your organisation have a process to test the deployment of business critical applications to their target managed environment (cloud or on-prem) to ensure there are no adverse impacts on operations or security? | Yes                                                                                                                                                                     |
|      | Last modified:                                                                                                                                                                                                          | 2023/08/04                                                                                                                                                              |
| F.35 | Is your organisation currently registered with the UK National Cyber Security Centre's (NCSC) Early Warning service?                                                                                                    | Yes                                                                                                                                                                     |
|      | Answer notes:                                                                                                                                                                                                           | The ISDPO is responsible for reviewing the alerts from the NCSC and has access to the NCSC portal for further investigation. Weekly reports are received from the NCSC. |
|      | Last modified:                                                                                                                                                                                                          | 2026/07/10                                                                                                                                                              |
| F.36 | Have you ensured that access to management interfaces for your boundary firewalls or other edge devices is appropriately secured?                                                                                       | Yes                                                                                                                                                                     |
|      | Last modified:                                                                                                                                                                                                          | 2026/08/03                                                                                                                                                              |

| G Physical Security |                                                                                                                                  |                                                                                                                                                                                                                                                                  |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scoping question:   | Does your organisation use any buildings, such as offices, warehouses, or data centres?                                          | Answer: Yes                                                                                                                                                                                                                                                      |
| Scoping notes:      | Recite Me have physical offices in the UK and USA, and use approved third-party data centres for hosting.                        |                                                                                                                                                                                                                                                                  |
|                     | Question                                                                                                                         | Answer                                                                                                                                                                                                                                                           |
| G.1                 | Does your organisation enforce a secure physical perimeter around all of its physical locations (e.g. offices, data centres...)? | Yes                                                                                                                                                                                                                                                              |
|                     | Answer notes:                                                                                                                    | Head office is in multi-tenant building, owned by local council. Building management team responsible for security and Recite Me are responsible for office security. Data centre providers are responsible for the physical security around their data centres. |
|                     | Last modified:                                                                                                                   | 2026/07/10                                                                                                                                                                                                                                                       |
| G.2                 | Does your organisation use CCTV to monitor entry and exit points of all premises?                                                | Yes                                                                                                                                                                                                                                                              |

|      |                                                                                                                            |                                                                                                                                                                                                                                                  |     |
|------|----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|      | Last modified:                                                                                                             | 2023/07/31                                                                                                                                                                                                                                       |     |
| G.3  | For how many days does your organisation keep CCTV footage?                                                                |                                                                                                                                                                                                                                                  | 30  |
|      | Last modified:                                                                                                             | 2023/07/31                                                                                                                                                                                                                                       |     |
| G.4  | Does your organisation use an access control system on its premises entry and exit points that includes logging of access? |                                                                                                                                                                                                                                                  | Yes |
|      | Answer notes:                                                                                                              | Access control system maintained and overseen by building management (HQ) Data centre access control is maintained by data centre vendor.                                                                                                        |     |
|      | Last modified:                                                                                                             | 2026/07/10                                                                                                                                                                                                                                       |     |
| G.5  | For how many months does your organisation keep its physical access control audit logs?                                    |                                                                                                                                                                                                                                                  | 12  |
|      | Last modified:                                                                                                             | 2023/08/09                                                                                                                                                                                                                                       |     |
| G.6  | Are all of your organisation's physical premises secured with an alarm?                                                    |                                                                                                                                                                                                                                                  | Yes |
|      | Last modified:                                                                                                             | 2023/07/31                                                                                                                                                                                                                                       |     |
| G.7  | Are all of your organisation's physical premises staffed 24/7 by a security team or reception team?                        |                                                                                                                                                                                                                                                  | Yes |
|      | Answer notes:                                                                                                              | Data centre used to host Recite Me products have 24/7 onsite security Office HQ has manned reception during opening hours and then monitored by local external security agency out of hours. There is no 24/7 security within the office domain. |     |
|      | Last modified:                                                                                                             | 2026/07/10                                                                                                                                                                                                                                       |     |
| G.8  | Does your organisation use visitor log books (or the digital equivalent) to record visitors at all premises?               |                                                                                                                                                                                                                                                  | Yes |
|      | Last modified:                                                                                                             | 2023/07/31                                                                                                                                                                                                                                       |     |
| G.9  | Does your organisation require visitors to undergo an ID check on arrival at all premises?                                 |                                                                                                                                                                                                                                                  | Yes |
|      | Answer notes:                                                                                                              | ID checks are carried out for access to the data centre where are products are hosted.                                                                                                                                                           |     |
|      | Last modified:                                                                                                             | 2025/07/23                                                                                                                                                                                                                                       |     |
| G.10 | Does your organisation protect sensitive equipment from power failures?                                                    |                                                                                                                                                                                                                                                  | Yes |
|      | Last modified:                                                                                                             | 2023/08/08                                                                                                                                                                                                                                       |     |
| G.11 | Does your organisation ensure confidential paper waste is disposed of securely?                                            |                                                                                                                                                                                                                                                  | Yes |
|      | Last modified:                                                                                                             | 2023/07/31                                                                                                                                                                                                                                       |     |

| H Business Resilience |                                                                                                              |                                                               |        |
|-----------------------|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|--------|
|                       | Question                                                                                                     |                                                               | Answer |
| H.1                   | Does your organisation have a documented Incident Response Plan?                                             |                                                               | Yes    |
|                       | Answer notes:                                                                                                | Please refer to the current procedure provided                |        |
|                       | Last modified:                                                                                               | 2026/07/10                                                    |        |
|                       | Evidence:                                                                                                    | Information Security Incident Management Procedure (Redacted) |        |
| H.2                   | Does your organisation's Incident Response Plan allow for the classification of information security events? |                                                               | Yes    |
|                       | Last modified:                                                                                               | 2023/07/31                                                    |        |
| H.3                   | Does your Incident Response Plan include consideration of legal and regulatory commitments?                  |                                                               | Yes    |

|      |                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                      |     |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|      | Last modified:                                                                                                                                                                                                                                              | 2023/07/31                                                                                                                                                                                                                           |     |
| H.4  | Does your organisation's Incident Response Plan include roles and responsibilities in the event of an incident?                                                                                                                                             |                                                                                                                                                                                                                                      | Yes |
|      | Last modified:                                                                                                                                                                                                                                              | 2023/08/07                                                                                                                                                                                                                           |     |
| H.5  | Does your organisation's Incident Response Plan include alternative communication systems in case your usual systems are disrupted?                                                                                                                         |                                                                                                                                                                                                                                      | Yes |
|      | Last modified:                                                                                                                                                                                                                                              | 2023/08/07                                                                                                                                                                                                                           |     |
| H.6  | Does your organisation's Incident Response Plan get tested through regular exercises, incorporating lessons from past incidents (including those affecting other organisations) and scenarios informed by threat intelligence and your own risk assessment? |                                                                                                                                                                                                                                      | Yes |
|      | Last modified:                                                                                                                                                                                                                                              | 2026/08/03                                                                                                                                                                                                                           |     |
| H.7  | Does your organisation have a cyber incident response and forensic capability (either internally or via a third party or cyber insurance policy)?                                                                                                           |                                                                                                                                                                                                                                      | Yes |
|      | Answer notes:                                                                                                                                                                                                                                               | Provided by cyber insurance provider                                                                                                                                                                                                 |     |
|      | Last modified:                                                                                                                                                                                                                                              | 2026/07/10                                                                                                                                                                                                                           |     |
| H.8  | Does your organisation have a process for employees, contractors, suppliers, or any external entities to report suspected or known information security breaches and weaknesses?                                                                            |                                                                                                                                                                                                                                      | Yes |
|      | Answer notes:                                                                                                                                                                                                                                               | Please refer to the provided procedure. All employees are made aware via new joiner and additional awareness training on incident management and reporting.                                                                          |     |
|      | Last modified:                                                                                                                                                                                                                                              | 2026/07/10                                                                                                                                                                                                                           |     |
| H.9  | Does your organisation have a process for reporting information security breaches that affect your clients to them in a timely manner?                                                                                                                      |                                                                                                                                                                                                                                      | Yes |
|      | Answer notes:                                                                                                                                                                                                                                               | Within 24 hours of discovery and verification                                                                                                                                                                                        |     |
|      | Last modified:                                                                                                                                                                                                                                              | 2026/07/10                                                                                                                                                                                                                           |     |
| H.10 | Does your organisation conduct a root cause analysis for all information security incidents that are reported?                                                                                                                                              |                                                                                                                                                                                                                                      | Yes |
|      | Answer notes:                                                                                                                                                                                                                                               | This forms part of the incident investigation and is a documented section within our incident report template.                                                                                                                       |     |
|      | Last modified:                                                                                                                                                                                                                                              | 2026/07/10                                                                                                                                                                                                                           |     |
| H.11 | Does your organisation have an approved Business Continuity Plan to ensure the continuity of service in a disaster?                                                                                                                                         |                                                                                                                                                                                                                                      | Yes |
|      | Answer notes:                                                                                                                                                                                                                                               | Please refer to our current business continuity policy provided.                                                                                                                                                                     |     |
|      | Last modified:                                                                                                                                                                                                                                              | 2026/07/10                                                                                                                                                                                                                           |     |
|      | Evidence:                                                                                                                                                                                                                                                   | <i>Business Continuity Policy</i>                                                                                                                                                                                                    |     |
| H.12 | Is your organisation's Business Continuity Plan based on a current risk assessment of your business?                                                                                                                                                        |                                                                                                                                                                                                                                      | Yes |
|      | Answer notes:                                                                                                                                                                                                                                               | Evidence of our risk assessments are not provided externally. However, they will form part of future surveillance audits conducted against Recite Me, as we work towards, obtain and maintain ISO 27001 and ISO 22301 certification. |     |
|      | Last modified:                                                                                                                                                                                                                                              | 2026/07/10                                                                                                                                                                                                                           |     |
| H.13 | Does your organisation's Business Continuity Plan address the backup and restoration of your business data and the data you process for your clients?                                                                                                       |                                                                                                                                                                                                                                      | Yes |

|      |                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                                       | Please refer to our business continuity policy provided for our RTO and RPO RPO = 24 hours RTO = 4 hours                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|      | Last modified:                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.14 | Does your organisation's Business Continuity Plan include operation of business activities from an alternative location?                                            | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                                       | If the offices are not accessible, employees can work remotely from home. There is no requirement for additional / emergency office space.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|      | Last modified:                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.15 | Does your organisation's plan include the maintenance of security controls in a disaster?                                                                           | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.16 | Does your organisation have a programme in place to regularly rehearse and maintain your Business Continuity and Disaster Recovery plans?                           | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                                       | Database / infrastructure failovers were conducted as part of the patching and vulnerability management which took place as part of our Cyber Essentials Plus assessment. Reports will be added to Risk Ledger once suitable for external visibility. A wider business continuity testing programme is being drawn up and implemented to include table top exercises. This is not in place yet but once functioning, there will be a variety of tests being conducted of our business continuity plans and processes over the course of the year, but with a failover test conducted on at least an annual basis. |
|      | Last modified:                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.17 | Has your organisation set Recovery Time Objectives (RTO) and / or Recovery Point Objectives (RPO)?                                                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                                       | RPO = 24 hours RTO = 4 hours                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      | Last modified:                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.18 | What is your Recovery Time Objective (RTO) in hours?                                                                                                                | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|      | Answer notes:                                                                                                                                                       | 4 hour RTO related to the Recite Me Toolbar product                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                      | 2025/02/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.19 | What is your Recovery Point Objective (RPO) in hours?                                                                                                               | 24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|      | Answer notes:                                                                                                                                                       | 24 hour RPO related to the Recite Me Toolbar product                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | Last modified:                                                                                                                                                      | 2025/02/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.20 | Did your organisation's most recent Business Continuity/Disaster Recovery test meet its defined Recovery Time Objectives (RTO) and Recovery Point Objectives (RPO)? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                      | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| H.21 | Does your organisation have cyber insurance?                                                                                                                        | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                      | 2026/03/31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|      | Evidence:                                                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| H.22 | What is the limit of your organisation's cyber insurance policy (in GBP)?                                                                                           | 2.0M                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | Last modified:                                                                                                                                                      | 2026/03/31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|      | Evidence:                                                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|      |                                                                                                                                                                                                                                                                                     |            |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| H.23 | Does your organisation maintain an understanding of the data important to the operation of your essential function(s), including where it is stored, where it flows (including to and from third parties), and the impact that an incident would have on the essential function(s)? | Yes        |
|      | Last modified:                                                                                                                                                                                                                                                                      | 2026/08/03 |

| I Supply Chain Management |                                                                                                                                                                                    |                                                                                                                                                                                              |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | Question                                                                                                                                                                           | Answer                                                                                                                                                                                       |
| I.1                       | Does your organisation have formal agreements in place to control third party use of personal data, including any requirements stipulated by relevant data protection legislation? | Yes                                                                                                                                                                                          |
|                           | Answer notes:                                                                                                                                                                      | Formal contractual agreements and DPAs are in place with our third-parties and sub-processors.                                                                                               |
|                           | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                   |
| I.2                       | Does your organisation have formal agreements in place that have appropriate security clauses, including a right to audit and mandatory adherence to security policies?            | Yes                                                                                                                                                                                          |
|                           | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                   |
| I.3                       | Does your organisation conduct a business impact assessment for each supplier and give them a corresponding criticality rating?                                                    | Yes                                                                                                                                                                                          |
|                           | Last modified:                                                                                                                                                                     | 2023/08/07                                                                                                                                                                                   |
| I.4                       | Does your organisation have a supplier security policy that outlines the security requirements that your suppliers are expected to meet?                                           | Yes                                                                                                                                                                                          |
|                           | Answer notes:                                                                                                                                                                      | We conduct security due diligence on our suppliers to ensure they have adequate security controls that meet our minimum requirements. Our current supplier management procedure is provided. |
|                           | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                   |
|                           | Evidence:                                                                                                                                                                          | <i>Supplier and Third-Party Management Policy</i>                                                                                                                                            |
| I.5                       | Does your organisation conduct security due diligence against suppliers before entering into a contract?                                                                           | Yes                                                                                                                                                                                          |
|                           | Last modified:                                                                                                                                                                     | 2023/08/04                                                                                                                                                                                   |
| I.6                       | Does your organisation conduct regular assurance activities against suppliers to ensure they are meeting their information security requirements?                                  | Yes                                                                                                                                                                                          |
|                           | Answer notes:                                                                                                                                                                      | We review on an annual basis                                                                                                                                                                 |
|                           | Last modified:                                                                                                                                                                     | 2025/08/06                                                                                                                                                                                   |

| J Data Protection |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scoping question: | Does your organisation collect, process, or store personal data, other than that of your own employees?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Answer: Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Scoping notes:    | <p>Extract from Schedule 1 of our DPA: Toolbar: Assistive Toolbar user IP addresses used to securely deliver the service. These are anonymised before storage and used to provide usage reports to the Client. Whilst unidentifiable, it still is considered personal data under Data Protection Legislation. Any Personal Data the Client publishes on its website(s) and/or application(s) integrated with the Assistive Toolbar, which cannot be determined in advance. Input fields used on a website, such as 'contact us' forms, are not processed by design and by default. HTML markup attributes in the webpage source can be used to ignore any Personal Data contained in the website(s) or application(s) content. Checker: Authorised employee names and email addresses for account management purposes to use the Accessibility Checker. Any Personal Data the Client publishes on its website(s) and/or application(s) scanned by the Accessibility Checker, which cannot be determined in advance. Clients should avoid scanning websites that display Personal or Account Data and instead scan templates or staging /environments. PDF Remediation: Authorised employee names and email addresses for account management purposes to use the PDF Accessibility Remediation platform. Any Personal Data the client contains within the PDFs being scanned and remediated by the PDF Accessibility Remediation platform, which cannot be determined in advance. Clients should remove or avoid PDFs which contain Personal or Account Data when running the PDF Accessibility Remediation platform. Accessibility Auditing: Any Personal Data the Client publishes on its website(s) and/or application(s) being reviewed or tested by the Accessibility Audit Consultants, which cannot be determined in advance. Clients should avoid scanning websites that display Personal or Account Data and instead scan templates or staging /environments. Online Accessibility Training: Authorised employee names and email addresses for account management purposes to use the online training platform. As a controller, we may collect and process data for our employees, former employees and those who visit our website and interact with us in relation to marketing activities.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                   | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Answer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| J.1               | Which countries do you store personal data in, or transfer personal data to?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | United Kingdom of Great Britain and Northern Ireland, Ireland, United States of America, Australia                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                   | Answer notes:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Data processing can be regionalised based on the clients location. For example, for a client using the UK hosted Toolbar service, all data processing* can be limited to within the EEA. *This requires not enabling features that use overseas sub-processors, e.g. AI functionality For further information, we direct all customers to our DPA and sub-processor list: DPA: <a href="https://knowledge.reciteme.com/knowledge/data-Sub-processors">https://knowledge.reciteme.com/knowledge/data-Sub-processors</a> : <a href="https://knowledge.reciteme.com/knowledge/recite-me-sub-processors">https://knowledge.reciteme.com/knowledge/recite-me-sub-processors</a> |
|                   | Last modified:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| J.2               | Do you use appropriate legal mechanisms for all international transfers of personal data?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

|     |                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | Answer notes:                                                                                                                                        | Recite Me has Standard Contractual Clauses (SCCs) or the UK International Data Transfer Agreement (IDTA) in place with applicable sub-processors outside the UK / EU, e.g. for data transfers to / from the UK and USA. For data transfers UK / UK, data transfers are covered under the DPA 2018 and UK GDPR. For data transfers UK / EU or vice versa, data transfers are covered under the Adequacy agreement between the UK / EU.                                                                                                                       |
|     | Last modified:                                                                                                                                       | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| J.3 | Has your organisation been subject to any personal data access requests from governments or other authorities in the last 24 months?                 | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|     | Last modified:                                                                                                                                       | 2023/07/31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| J.4 | Does your organisation have a nominated Data Protection Officer (DPO)?                                                                               | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|     | Answer notes:                                                                                                                                        | Whilst Recite Me does not meet the criteria under Article 37 of GDPR to require a Data Protection Officer (DPO), the Information Security and Data Protection Officer holds that position. The Information Security and Data Protection Officer acts in accordance with Article 38 of GDPR. Recite Me are registered with the Information Commission (also known as the Information Commissioner's Office or ICO). Please find the details below: Registration Reference: ZA485564 Data Protection Officer: Simon Backwell Email address: data@reciteme.com |
|     | Last modified:                                                                                                                                       | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| J.5 | Does your organisation have an up-to-date Data Protection Policy?                                                                                    | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|     | Answer notes:                                                                                                                                        | Please find attached our current policy. This is currently being reviewed and updated to reflect recent business changes and legislative updates.                                                                                                                                                                                                                                                                                                                                                                                                           |
|     | Last modified:                                                                                                                                       | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|     | Evidence:                                                                                                                                            | <i>Data Protection Policy</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| J.6 | Does your organisation maintain a record of all personal data collection & processing activities?                                                    | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|     | Answer notes:                                                                                                                                        | Records of Processing Activities (ROPAs) are in place. However, by default, all processing carried out by Recite Me is of data on public facing websites or applications, as instructed by our customers (as Controller), unless otherwise formally instructed by the Customer. Recite Me detail some of this in our DPA, which can be found here: <a href="https://knowledge.reciteme.com/knowledge/data-">https://knowledge.reciteme.com/knowledge/data-</a>                                                                                              |
|     | Last modified:                                                                                                                                       | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| J.7 | Has your organisation defined and documented the lawful basis of each instance of personal data collection or processing?                            | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|     | Answer notes:                                                                                                                                        | As a Controller, we have defined the lawful basis for collecting data in relation to our employment and marketing activities. As a Processor, it is not for us to define the lawful basis. This is for the customer, as Controller, to define. Typically, it is based on legitimate interest, as they have a legitimate interest to provide accessibility functionality to their website and / or application users.                                                                                                                                        |
|     | Last modified:                                                                                                                                       | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| J.8 | Does your organisation conduct a Data Protection Impact Assessment (DPIA) for all processing that is likely to result in a high risk to individuals? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

|      |                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                                                           | DPIAs are conducted for any internal project where there may be an impact on personal data, even if not a high risk. This is to ensure that the appropriate assessments are being carried out and the impact being considered. For our activities as a Processor, we will assist customers to complete their DPIAs by providing information on our technical and organisational measures. We cannot fully complete customer DPIAs, as they are responsible for assessing the impact and risk, as Controller.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Last modified:                                                                                                                                                                          | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| J.9  | Can your organisation facilitate an individual's data privacy rights?                                                                                                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|      | Answer notes:                                                                                                                                                                           | For users of our products or services, any data subject right requests must be sent to the site or application owner where they used our product. As Controller, they must deal with this in the first instance. As their Processor, we will assist them as instructed. For our activities as a Controller, we can assist individuals with their data subject rights. Details are in our privacy notice: <a href="https://reciteme.com/policies/privacy-policy/">https://reciteme.com/policies/privacy-policy/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Last modified:                                                                                                                                                                          | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| J.10 | Does your organisation have a Records Retention Policy?                                                                                                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|      | Answer notes:                                                                                                                                                                           | Please refer to the attached policy. This is currently being reviewed and updated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Last modified:                                                                                                                                                                          | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Evidence:                                                                                                                                                                               | <i>Data Retention Policy</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| J.11 | Does your organisation have robust detection, investigation and reporting procedures in place for personal data breaches, including maintaining a record of all personal data breaches? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|      | Answer notes:                                                                                                                                                                           | Please refer to our incident management procedure provided.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|      | Last modified:                                                                                                                                                                          | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Evidence:                                                                                                                                                                               | <i>Information Security Incident Management Procedure (Redacted)</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| J.12 | Does your organisation have a process for notifying the relevant Authority and all relevant parties (e.g. data controllers) when a breach occurs?                                       | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|      | Answer notes:                                                                                                                                                                           | For our activities as a Processor, upon verification of a personal data breach, we will notify affected customer(s) without undue delay, usually within 24 hours. Customers are then responsible for reporting to the supervisory authorities, if they wish to. For our activities as a Controller, upon verification of a personal data breach, we will notify the relevant supervisory authorities and impacted user(s) without undue delay, in line with legislative requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|      | Last modified:                                                                                                                                                                          | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| J.13 | Has your organisation suffered a security incident that led to a Personal Data breach in the last 6 months?                                                                             | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Last modified:                                                                                                                                                                          | 2023/07/31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| J.14 | Does your organisation process personal data on behalf of another organisation?                                                                                                         | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|      | Answer notes:                                                                                                                                                                           | Extract from Schedule 1 of our DPA: Toolbar: Assistive Toolbar user IP addresses used to securely deliver the service. These are anonymised before storage and used to provide usage reports to the Client. Whilst unidentifiable, it still is considered personal data under Data Protection Legislation. Any Personal Data the Client publishes on its website(s) and/or application(s) integrated with the Assistive Toolbar, which cannot be determined in advance. Input fields used on a website, such as 'contact us' forms, are not processed by design and by default. HTML markup attributes in the webpage source can be used to ignore any Personal Data contained in the website(s) or application(s) content. Checker: Authorised employee names and email addresses for account management purposes to use the Accessibility Checker. Any Personal Data the Client publishes on its website(s) and/or application(s) scanned by the Accessibility Checker, which cannot be determined in advance. Clients should avoid scanning websites that display Personal or Account Data and instead scan templates or staging /environments. PDF Remediation: Authorised employee names and email addresses for account management purposes to use the PDF Accessibility Remediation platform. Any Personal Data the client contains within the PDFs being scanned and remediated by the PDF Accessibility Remediation platform, which cannot be determined in advance. |



|      |                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                                                                                                            | <p>Clients should remove or avoid PDFs which contain Personal or Account Data when running the PDF Accessibility Remediation platform. Accessibility Auditing: Any Personal Data the Client publishes on its website(s) and/or application(s) being reviewed or tested by the Accessibility Audit Consultants, which cannot be determined in advance. Clients should avoid scanning websites that display Personal or Account Data and instead scan templates or staging /environments. Online Accessibility Training: Authorised employee names and email addresses for account management purposes to use the online training platform.</p>                                                        |
|      | Last modified:                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| J.15 | Does your organisation have procedures in place to inform and obtain authorisation (if required) from the data controller before engaging a sub-processor? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Answer notes:                                                                                                                                              | <p>Contractual agreement / DPA provides general authorisation for the use of approved sub-processors. Any changes to sub-processors are notified to customers in advance with a 30 day objection period. Customers can subscribe to our Sub-Processor update service here: <a href="https://docs.google.com/forms/d/e/1FAIpQLSdpaJjDo890bSqef5168fUx9U-j_K9xrlkKkj5lWVpYs4twA/viewform">https://docs.google.com/forms/d/e/1FAIpQLSdpaJjDo890bSqef5168fUx9U-j_K9xrlkKkj5lWVpYs4twA/viewform</a> A list of our sub-processors is available here: <a href="https://knowledge.reciteme.com/knowledge/recite-me-sub-processors">https://knowledge.reciteme.com/knowledge/recite-me-sub-processors</a></p> |
|      | Last modified:                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| J.16 | Does your organisation ensure that processing activities are only carried out under the documented instructions of the data controller?                    | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|      | Answer notes:                                                                                                                                              | <p>This is in line with our MSA and DPA (or their DPA, depending on their requirements), which we agree and sign off with every customer. Employees are aware that Recite Me cannot use customer data for our own purposes and we must only carry out activities under the customer's instruction.</p>                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                             | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| K Artificial Intelligence |                                                                                                                       |                                                                                                                                                        |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | Question                                                                                                              | Answer                                                                                                                                                 |
| K.1                       | Does your organisation have a documented AI Policy?                                                                   | Yes                                                                                                                                                    |
|                           | Answer notes:                                                                                                         | An AI policy is documented and accessible to all employees. Please refer to the current version attached.                                              |
|                           | Last modified:                                                                                                        | 2026/07/10                                                                                                                                             |
|                           | Evidence:                                                                                                             | <i>AI Policy</i>                                                                                                                                       |
| K.2                       | Does your organisation use Machine Learning or Generative Artificial Intelligence (AI) models for internal use-cases? | Yes                                                                                                                                                    |
|                           | Answer notes:                                                                                                         | Internally, AI tools are used for proofreading and amending documentation and emails, note-taking on video conferencing services and code base checks. |
|                           | Last modified:                                                                                                        | 2026/07/10                                                                                                                                             |
| K.3                       | Has your organisation conducted a risk assessment of each internal use of AI models?                                  | Yes                                                                                                                                                    |
|                           | Answer notes:                                                                                                         | Risk assessments have been conducted against the use of AI tools and models for internal usage and usage in our products and services.                 |
|                           | Last modified:                                                                                                        | 2026/07/10                                                                                                                                             |
| K.4                       | Do you have processes in place to ensure your service user evaluates the AI model responses before use?               | Yes                                                                                                                                                    |

|     |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | Answer notes:                                                                                                                                                                                                                        | Our AI features are designed to support specific, controlled use cases within our products. All AI features are subject to internal review and testing prior to release into production. Internally, all AI tools and models are reviewed by Information Security to ensure the suitability for usage and recommendations are provided to the software owners on the appropriate configuration for usage (e.g. model not trained, zero retention periods if possible, etc).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|     | Last modified:                                                                                                                                                                                                                       | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| K.5 | Does your organisation use automated decision-making technologies (e.g. Machine Learning models, AI agents) for internal use-cases that can take actions or make decisions without human review?                                     | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|     | Last modified:                                                                                                                                                                                                                       | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| K.6 | Where automated decision-making technologies are used, are technical and/or procedural guardrails implemented to prevent actions that could adversely impact critical systems or services?                                           | Not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|     | Answer notes:                                                                                                                                                                                                                        | No automated decision making takes place within our products or internally. Everything requires a human interaction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|     | Last modified:                                                                                                                                                                                                                       | 2026/07/30                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| K.7 | Where automated decision-making technologies are used, can system or service configuration decisions be reproduced through testing with identical inputs and do you retain sufficient records to identify any variance in decisions? | Not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|     | Answer notes:                                                                                                                                                                                                                        | No automated decision making takes place within our products or internally. Everything requires a human interaction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|     | Last modified:                                                                                                                                                                                                                       | 2026/07/30                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| K.8 | Does your organisation embed Machine Learning or Generative AI (AI) capabilities within any service(s) you provide to clients?                                                                                                       | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|     | Answer notes:                                                                                                                                                                                                                        | Recite Me have implemented AI into our products, as follows: Toolbar: The Toolbar uses AI to power 4 features: - Page summariser - Simplified content - Dictionary - TranslationsDetails of these features can be viewed here: <a href="https://knowledge.reciteme.com/knowledge/toolbar-ai-driven-features-1">https://knowledge.reciteme.com/knowledge/toolbar-ai-driven-features-1</a> Checker: The Checker product uses AI to power two features: - Fix suggestions - generates text to explain to the user how to fix issues identified as non-compliant with WCAG requirements. - Auto fixes - Auto generates fixes, which the user can implement onto the website PDF Remediation: The PDF remediation uses AI to remediate selected PDFs within the customer's estate. It then creates accessible versions of the PDFs, which can either be hosted by Recite Me or hosted by the customer. We have attached our AI terms as additional evidence, which provides further information. |
|     | Last modified:                                                                                                                                                                                                                       | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|     | Evidence:                                                                                                                                                                                                                            | <i>Recite Me Additional AI Terms</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| K.9 | Has your organisation conducted a regulatory compliance and security risk assessment of how your AI or AI-supported service processes and responds to client data and information?                                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

|      |                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                                                                                                   | Risk assessment and treatment plans implemented to ensure the responsible and accurate use of AI in products. This includes guardrails to ensure the features that use AI can only be used to provide the desired functionality.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| K.10 | Do your AI or AI-supported service(s) encourage service users to evaluate the AI model's responses before use?                                                                                                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | Our AI features are designed to support specific, controlled use cases within our products. All AI features are subject to internal review and testing prior to release into production. Where AI is used in our product, disclaimers are provided so that users know that content may be generated by AI. A more detailed AI disclaimer will soon be available on our website. Please see the AI terms for further information                                                                                                                                                                                                                                                                  |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|      | Evidence:                                                                                                                                                                                                                       | <i>Recite Me Additional AI Terms</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| K.11 | Is client data processed by the AI model discarded and erased from memory when processing of that data has completed?                                                                                                           | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | Recite Me have entered into a Zero Retention agreement with the AI vendors used to power our AI features, which ensures that neither the input or output data is stored once the processing activity is complete.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| K.12 | Is sensitive data (including personal or confidential data) removed, masked or otherwise prevented from being input into AI models for all services you provide?                                                                | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | It is, provided that any personal or sensitive data has been identified prior to use with our products by the customer and removed or ignored accordingly. For example: Toolbar: We allow personal or sensitive data to be excluded from processing by the customer. This requires them tagging the data, the page section or the entire page so that it can be ignored from Toolbar processing. Checker: We allow the customer to remove pages which contain sensitive data from being included in page scanning. PDF Remediation: We allow the customer to exclude PDFs from being remediated, or suggest they remove / mask personal data in the PDFs before they are scanned and remediated. |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| K.13 | Is client data and information (e.g. prompts) used to train AI models?                                                                                                                                                          | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                                                                                                   | No data is used to train AI models                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| K.14 | Is client data, and any AI model trained or fine-tuned using it, kept segregated so that it is not accessible to your other clients or to your AI model providers beyond what is required to deliver that client's own service? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | No data is used to train AI models but databases are logically separated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| K.15 | Does your organisation have a formal AI model change management process that gives consideration to information security and regulatory requirements and includes notification to relevant clients?                             | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

|      |                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                                                      | This would fall into our supplier / sub-processor and change management processes. Some details can be found in our DPA and AI terms.                                                                                                                                                                                                                                                                                                                                                                  |
|      | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|      | Evidence:                                                                                                                                                                          | <i>Recite Me Additional AI Terms, Recite Me Data Processing Agreement (DPA)</i>                                                                                                                                                                                                                                                                                                                                                                                                                        |
| K.16 | Does your organisation have processes in place to identify, triage and remediate the effects of AI model updates such as output accuracy or bias?                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Answer notes:                                                                                                                                                                      | We have processes in place to evaluate the effects of AI model updates before deployment. We conduct testing on AI models used in our products to assess output accuracy and potential biases before release to production. Additionally, we welcome client feedback on AI-generated content to help continuously refine and improve its quality and reliability                                                                                                                                       |
|      | Last modified:                                                                                                                                                                     | 2025/02/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|      | In relation to:                                                                                                                                                                    | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| K.8  | Does your organisation embed Machine Learning or Generative AI (AI) capabilities within any service(s) you provide to clients?                                                     | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Answer notes:                                                                                                                                                                      | AI is used to improve the analysis of the accessibility checks being provided. The scanner will assess the site or content and provide analysis of how accessible the site / content is to users.                                                                                                                                                                                                                                                                                                      |
|      | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|      | In relation to:                                                                                                                                                                    | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| K.9  | Has your organisation conducted a regulatory compliance and security risk assessment of how your AI or AI-supported service processes and responds to client data and information? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Answer notes:                                                                                                                                                                      | A risk assessment was conducted for AI usage in the Checker. It is reviewed annually or upon significant change. As part of the assessment, we take into account the limited impact on personal data, how the content is processed by the AI functions, the processing by a US sub-processor, the zero retention settings and the model not being trained on any data. We also take into account that no user custom-generated prompts can be made, as the checker is run by pressing a button prompt. |
|      | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|      | In relation to:                                                                                                                                                                    | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| K.10 | Do your AI or AI-supported service(s) encourage service users to evaluate the AI model's responses before use?                                                                     | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Answer notes:                                                                                                                                                                      | Our AI features are designed to support specific, controlled use cases within our products. All AI features are subject to internal review and testing prior to release into production. Where AI is used in our product, disclaimers are provided so that users know that content may be generated by AI. A more detailed AI disclaimer will soon be available on our website. Please see the AI terms for further information                                                                        |
|      | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|      | In relation to:                                                                                                                                                                    | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| K.11 | Is client data processed by the AI model discarded and erased from memory when processing of that data has completed?                                                              | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|      | Answer notes:                                                                                                                                                                      | Recite Me have entered into a Zero Retention agreement with the AI vendors used to power our AI features, which ensures that neither the input or output data is stored once the processing activity is complete.                                                                                                                                                                                                                                                                                      |
|      | Last modified:                                                                                                                                                                     | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|      | In relation to:                                                                                                                                                                    | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|      |                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                  |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| K.12 | Is sensitive data (including personal or confidential data) removed, masked or otherwise prevented from being input into AI models for all services you provide?                                                                | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | It is, provided that any personal or sensitive data has been identified prior to use with our products by the customer and removed or ignored accordingly. For Checker, we allow the customer to remove pages which contain sensitive data from being included in page scanning.                                                                                 |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                 | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                     |
| K.13 | Is client data and information (e.g. prompts) used to train AI models?                                                                                                                                                          | No                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                                                                                                   | No data is used to train AI models                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                 | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                     |
| K.14 | Is client data, and any AI model trained or fine-tuned using it, kept segregated so that it is not accessible to your other clients or to your AI model providers beyond what is required to deliver that client's own service? | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | No data is used to train AI models but databases are logically separated.                                                                                                                                                                                                                                                                                        |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                 | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                     |
| K.15 | Does your organisation have a formal AI model change management process that gives consideration to information security and regulatory requirements and includes notification to relevant clients?                             | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | This would fall into our supplier / sub-processor and change management processes. Some details can be found in our DPA and AI terms.                                                                                                                                                                                                                            |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                 | <b>Accessibility Checker</b>                                                                                                                                                                                                                                                                                                                                     |
| K.16 | Does your organisation have processes in place to identify, triage and remediate the effects of AI model updates such as output accuracy or bias?                                                                               | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | We have processes in place to evaluate the effects of AI model updates before deployment. We conduct testing on AI models used in our products to assess output accuracy and potential biases before release to production. Additionally, we welcome client feedback on AI-generated content to help continuously refine and improve its quality and reliability |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                          |
| K.8  | Does your organisation embed Machine Learning or Generative AI (AI) capabilities within any service(s) you provide to clients?                                                                                                  | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                   | AI is used to summarise or to simplify page content and provide an advanced dictionary to users. It also provides translations. These are provided through button prompts, so no user custom-generated prompts are possible.                                                                                                                                     |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                          |
| K.9  | Has your organisation conducted a regulatory compliance and security risk assessment of how your AI or AI-supported service processes and responds to client data and information?                                              | Yes                                                                                                                                                                                                                                                                                                                                                              |

|      |                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|      | Answer notes:                                                                                                                                                                                                                   | A risk assessment was conducted for AI usage in the Toolbar. It is reviewed annually or upon significant change. As part of the assessment, we take into account the limited impact on personal data, how the content is processed by the AI functions, the processing by a US sub-processor, the zero retention settings and the model not being trained on any data. We also take into account that no user custom-generated prompts can be made. |  |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| K.10 | Do your AI or AI-supported service(s) encourage service users to evaluate the AI model's responses before use?                                                                                                                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|      | Answer notes:                                                                                                                                                                                                                   | Our AI features are designed to support specific, controlled use cases within our products. All AI features are subject to internal review and testing prior to release into production. Where AI is used in our product, disclaimers are provided so that users know that content may be generated by AI. A more detailed AI disclaimer will soon be available on our website. Please see the AI terms for further information                     |  |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| K.11 | Is client data processed by the AI model discarded and erased from memory when processing of that data has completed?                                                                                                           | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|      | Answer notes:                                                                                                                                                                                                                   | Recite Me have entered into a Zero Retention agreement with the AI vendors used to power our AI features, which ensures that neither the input or output data is stored once the processing activity is complete.                                                                                                                                                                                                                                   |  |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| K.12 | Is sensitive data (including personal or confidential data) removed, masked or otherwise prevented from being input into AI models for all services you provide?                                                                | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|      | Answer notes:                                                                                                                                                                                                                   | It is, provided that any personal or sensitive data has been identified prior to use with our products by the customer and removed or ignored accordingly. For Toolbar, we allow personal or sensitive data to be excluded from processing by the customer. This requires them tagging the data, the page section or the entire page so that it can be ignored from Toolbar processing.                                                             |  |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| K.13 | Is client data and information (e.g. prompts) used to train AI models?                                                                                                                                                          | No                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |
|      | Answer notes:                                                                                                                                                                                                                   | No data is used to train AI models.                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|      | Last modified:                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| K.14 | Is client data, and any AI model trained or fine-tuned using it, kept segregated so that it is not accessible to your other clients or to your AI model providers beyond what is required to deliver that client's own service? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|      | Answer notes:                                                                                                                                                                                                                   | No data is used to train AI models but databases are logically separated.                                                                                                                                                                                                                                                                                                                                                                           |  |
|      | Last modified:                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
|      | In relation to:                                                                                                                                                                                                                 | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |  |

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|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| K.15 | Does your organisation have a formal AI model change management process that gives consideration to information security and regulatory requirements and includes notification to relevant clients? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Answer notes:                                                                                                                                                                                       | This would fall into our supplier / sub-processor and change management processes. Some details can be found in our DPA and AI terms.                                                                                                                                                                                                                                                                                                                                                                          |
|      | Last modified:                                                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|      | In relation to:                                                                                                                                                                                     | <b>Assitive Toolbar</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| K.16 | Does your organisation have processes in place to identify, triage and remediate the effects of AI model updates such as output accuracy or bias?                                                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Answer notes:                                                                                                                                                                                       | We have processes in place to evaluate the effects of AI model updates before deployment. We conduct testing on AI models used in our products to assess output accuracy and potential biases before release to production. Additionally, we welcome client feedback on AI-generated content to help continuously refine and improve its quality and reliability                                                                                                                                               |
|      | Last modified:                                                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|      | In relation to:                                                                                                                                                                                     | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| K.8  | Does your organisation embed Machine Learning or Generative AI (AI) capabilities within any service(s) you provide to clients?                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Answer notes:                                                                                                                                                                                       | AI is used to make the necessary remediations, based on the scan that has been commenced by the checker. The alternative is an individual making multiple accessibility and content changes to several PDFs manually. By using the PDF Remediation tool, it makes the changes in a shorter timeframe and as accurately as possible.                                                                                                                                                                            |
|      | Last modified:                                                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|      | In relation to:                                                                                                                                                                                     | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| K.9  | Has your organisation conducted a regulatory compliance and security risk assessment of how your AI or AI-supported service processes and responds to client data and information?                  | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Answer notes:                                                                                                                                                                                       | A risk assessment was conducted for AI usage in PDF Remediation. It is reviewed annually or upon significant change. As part of the assessment, we take into account the limited impact on personal data, how the content is processed by the AI functions, the processing by a US sub-processor, the zero retention settings and the model not being trained on any data. We also take into account that no user custom-generated prompts can be made, as the remediation is run by pressing a button prompt. |
|      | Last modified:                                                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|      | In relation to:                                                                                                                                                                                     | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| K.10 | Do your AI or AI-supported service(s) encourage service users to evaluate the AI model's responses before use?                                                                                      | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | Answer notes:                                                                                                                                                                                       | Our AI features are designed to support specific, controlled use cases within our products. All AI features are subject to internal review and testing prior to release into production. Where AI is used in our product, disclaimers are provided so that users know that content may be generated by AI. A more detailed AI disclaimer will soon be available on our website. Please see the AI terms for further information                                                                                |
|      | Last modified:                                                                                                                                                                                      | 2026/07/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|      | In relation to:                                                                                                                                                                                     | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| K.11 | Is client data processed by the AI model discarded and erased from memory when processing of that data has completed?                                                                               | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

|      |                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                  |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Answer notes:                                                                                                                                                                                                                                   | Recite Me have entered into a Zero Retention agreement with the AI vendors used to power our AI features, which ensures that neither the input or output data is stored once the processing activity is complete.                                                                                                                                                |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                                 | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                 |
| K.12 | Is sensitive data (including personal or confidential data) removed, masked or otherwise prevented from being input into AI models for all services you provide?                                                                                | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                                   | It is, provided that any personal or sensitive data has been identified prior to use with our products by the customer and removed or ignored accordingly. For PDF Remediation, we allow the customer to exclude PDFs from being remediated, or suggest they remove / mask personal data in the PDFs before they are scanned and remediated.                     |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                                 | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                 |
| K.13 | Is client data and information (e.g. prompts) used to train AI models?                                                                                                                                                                          | No                                                                                                                                                                                                                                                                                                                                                               |
|      | Answer notes:                                                                                                                                                                                                                                   | No data is used to train AI models.                                                                                                                                                                                                                                                                                                                              |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                                 | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                 |
| K.14 | Is client data, and any AI model trained or fine-tuned using it, kept segregated so that it is not accessible to your other clients or to your AI model providers beyond what is required to deliver that client's own service?                 | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                                   | No data is used to train AI models but databases are logically separated.                                                                                                                                                                                                                                                                                        |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                                 | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                 |
| K.15 | Does your organisation have a formal AI model change management process that gives consideration to information security and regulatory requirements and includes notification to relevant clients?                                             | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                                   | This would fall into our supplier / sub-processor and change management processes. Some details can be found in our DPA and AI terms.                                                                                                                                                                                                                            |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
|      | In relation to:                                                                                                                                                                                                                                 | <b>PDF Accessibility Checker and Remediation</b>                                                                                                                                                                                                                                                                                                                 |
| K.16 | Does your organisation have processes in place to identify, triage and remediate the effects of AI model updates such as output accuracy or bias?                                                                                               | Yes                                                                                                                                                                                                                                                                                                                                                              |
|      | Answer notes:                                                                                                                                                                                                                                   | We have processes in place to evaluate the effects of AI model updates before deployment. We conduct testing on AI models used in our products to assess output accuracy and potential biases before release to production. Additionally, we welcome client feedback on AI-generated content to help continuously refine and improve its quality and reliability |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/07/10                                                                                                                                                                                                                                                                                                                                                       |
| K.17 | Is client data otherwise exposed to Machine Learning or Generative AI models outside of the direct AI-enabled service(s) your client has purchased (for example, through internal tools used by your staff, sub-processors, or other products)? | No                                                                                                                                                                                                                                                                                                                                                               |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                       |
| K.18 | Is client data exposed to AI outside your direct service discarded and erased once processing is complete?                                                                                                                                      | Not applicable                                                                                                                                                                                                                                                                                                                                                   |
|      | Last modified:                                                                                                                                                                                                                                  | 2026/08/03                                                                                                                                                                                                                                                                                                                                                       |



|      |                                                                                                                                                                                                                                                                      |                |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| K.19 | Is sensitive data (including personal or confidential data) removed, masked, or otherwise prevented from being input into these AI models?                                                                                                                           | Not applicable |
|      | Last modified: 2026/08/03                                                                                                                                                                                                                                            |                |
| K.20 | Is client data exposed to AI outside your direct service used to train AI models?                                                                                                                                                                                    | Not applicable |
|      | Last modified: 2026/08/03                                                                                                                                                                                                                                            |                |
| K.21 | Is client data exposed to AI outside your direct service, and any model trained or fine-tuned using it, kept segregated so that it is not accessible to your other clients or reused by the AI provider or sub-processor beyond what's needed for that specific use? | Not applicable |
|      | Last modified: 2026/08/03                                                                                                                                                                                                                                            |                |
| K.22 | Are technical and procedural safeguards implemented to prevent the use of client data within unauthorised AI services that may be considered "shadow AI" (e.g. employees' personal LLM accounts)?                                                                    | Yes            |
|      | Last modified: 2026/08/03                                                                                                                                                                                                                                            |                |

| XA Financial Risk |                                                                                                                                                                                                                                                                                                                                     |        |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
|                   | Question                                                                                                                                                                                                                                                                                                                            | Answer |
| XA.1              | Is your organisation a legally registered entity?                                                                                                                                                                                                                                                                                   | Yes    |
|                   | Answer notes: Register company via UK Companies House:<br><a href="https://find-and-update.company-information.service.gov.uk/company/07258145">https://find-and-update.company-information.service.gov.uk/company/07258145</a> UK Company number: 07258145 Legal entities in the UK, USA and Australia are all legally registered. |        |
|                   | Last modified: 2026/07/09                                                                                                                                                                                                                                                                                                           |        |
|                   | Evidence: <i>Recite - Certificate of Incorporation</i>                                                                                                                                                                                                                                                                              |        |
| XA.2              | Does your organisation have enough working capital to remain viable for the next 12 months?                                                                                                                                                                                                                                         | Yes    |
|                   | Last modified: 2023/08/24                                                                                                                                                                                                                                                                                                           |        |
| XA.3              | Does your organisation have 3 years (or more) of published annual accounts?                                                                                                                                                                                                                                                         | Yes    |
|                   | Answer notes: Please visit UK Companies House for our filing history:<br><a href="https://find-and-update.company-information.service.gov.uk/company/07258145/filing-history">https://find-and-update.company-information.service.gov.uk/company/07258145/filing-history</a>                                                        |        |
|                   | Last modified: 2026/07/09                                                                                                                                                                                                                                                                                                           |        |
| XA.4              | Does your organisation have a documented set of policies and procedures for managing compliance with all applicable anti-money laundering (AML) laws and regulations, including anti-terrorism financing laws and regulations, within the jurisdictions that you operate?                                                           | No     |
|                   | Answer notes: These are not currently documented but are being considered and documented as necessary.                                                                                                                                                                                                                              |        |
|                   | Last modified: 2026/07/09                                                                                                                                                                                                                                                                                                           |        |
| XA.5              | Does your organisation have a documented set of policies and procedures for managing compliance with all applicable anti-bribery and corruption (AB&C) legislation or regulations in the jurisdictions in which you operate?                                                                                                        | Yes    |
|                   | Last modified: 2026/01/21                                                                                                                                                                                                                                                                                                           |        |
|                   | Evidence: <i>Fraud Prevention and Anti-Bribery and Corruption Policy - Jan 26</i>                                                                                                                                                                                                                                                   |        |
| XA.6              | Does your organisation have a policy to manage conflicts of interest relevant to anti-bribery and corruption?                                                                                                                                                                                                                       | Yes    |

|       |                                                                                                                                                                                                     |                                                                                                                                                                                               |     |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|       | Last modified:                                                                                                                                                                                      | 2026/01/21                                                                                                                                                                                    |     |
|       | Evidence:                                                                                                                                                                                           | <i>Fraud Prevention and Anti-Bribery and Corruption Policy - Jan 26</i>                                                                                                                       |     |
| XA.7  | Does your organisation provide employees with regular anti-bribery and corruption compliance training, including at onboarding?                                                                     |                                                                                                                                                                                               | Yes |
|       | Answer notes:                                                                                                                                                                                       | Content is accessible and provided via our online learning management system (LMS).                                                                                                           |     |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
| XA.8  | Does your organisation conduct assurance against its third party suppliers, agents, and sub-contractors to ensure that they have a required level of anti-bribery policies and procedures in place? |                                                                                                                                                                                               | Yes |
|       | Answer notes:                                                                                                                                                                                       | This forms part of our supplier assurance process. The current procedure is attached but is being reviewed and updated.                                                                       |     |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
|       | Evidence:                                                                                                                                                                                           | <i>Supplier and Third-Party Management Policy</i>                                                                                                                                             |     |
| XA.9  | Does your organisation have a documented set of policies and procedures to ensure compliance with financial and trade sanctions?                                                                    |                                                                                                                                                                                               | Yes |
|       | Answer notes:                                                                                                                                                                                       | Not currently documented, though we would not work with companies or in countries who are facing / under sanction (e.g. Russia)                                                               |     |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
| XA.10 | Does your organisation have a compliance officer or equivalent role dedicated to financial crime, including economic and trade sanction compliance?                                                 |                                                                                                                                                                                               | No  |
|       | Answer notes:                                                                                                                                                                                       | However, the ISDPO provides information, insight and guidance in this area, based on their supplier assurance review and information they receive and have access to.                         |     |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
| XA.11 | Does your organisation conduct ongoing due diligence to ensure your company is not dealing with a sanctioned company or individual?                                                                 |                                                                                                                                                                                               | Yes |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
| XA.12 | Does your organisation have pre-transaction screening processes that makes use of all applicable economic and trade sanctions lists?                                                                |                                                                                                                                                                                               | Yes |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
| XA.13 | Does your organisation provide employees with regular sanctions training, including at onboarding?                                                                                                  |                                                                                                                                                                                               | No  |
|       | Answer notes:                                                                                                                                                                                       | Not currently but those in Security and Finance have the relevant information and guidance to ensure that sanctioned bodies are not used, based on experience of conducting supplier reviews. |     |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
| XA.14 | Does your organisation have an established, consistent, and documented framework in place covering the detection, prevention, response to and investigation of suspicious or fraudulent activity?   |                                                                                                                                                                                               | Yes |
|       | Answer notes:                                                                                                                                                                                       | This will form part of the incident management procedure. The current version is provided, though this will be updated to include elements of fraud prevention and investigation.             |     |
|       | Last modified:                                                                                                                                                                                      | 2026/07/09                                                                                                                                                                                    |     |
|       | Evidence:                                                                                                                                                                                           | <i>Information Security Incident Management Procedure (Redacted)</i>                                                                                                                          |     |
| XA.15 | Does your organisation have a documented fraud response plan?                                                                                                                                       |                                                                                                                                                                                               | No  |

|           |                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                              |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | Answer notes:                                                                                                                       | Not currently but this will be documented as part of a wider set of plans and playbooks under our incident management framework.                                                                                                                                                                                                             |
|           | Last modified:                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                   |
| XA.1<br>6 | Is financial crime considered at senior management level within your organisation?                                                  | Yes                                                                                                                                                                                                                                                                                                                                          |
|           | Answer notes:                                                                                                                       | Our CFO is responsible for considering this and taking the necessary actions to prevent it.                                                                                                                                                                                                                                                  |
|           | Last modified:                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                   |
| XA.1<br>7 | Does your organisation provide employees with regular fraud prevention training and/or awareness sessions, including at onboarding? | No                                                                                                                                                                                                                                                                                                                                           |
|           | Answer notes:                                                                                                                       | On induction but not regular refreshers at this time. However, content is available in our online LMS so is something to consider for future training programmes. It should be noted that aspects are covered under our social engineering training, which is covered at a high level upon joining and as part of annual awareness training. |
|           | Last modified:                                                                                                                      | 2026/07/09                                                                                                                                                                                                                                                                                                                                   |
| XA.1<br>8 | Does your organisation have public liability insurance?                                                                             | Yes                                                                                                                                                                                                                                                                                                                                          |
|           | Last modified:                                                                                                                      | 2026/03/31                                                                                                                                                                                                                                                                                                                                   |
|           | Evidence:                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                |
| XA.1<br>9 | What is the limit of your organisation's public liability insurance policy (in GBP)?                                                | 10.0M                                                                                                                                                                                                                                                                                                                                        |
|           | Last modified:                                                                                                                      | 2025/04/08                                                                                                                                                                                                                                                                                                                                   |
|           | Evidence:                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                |
| XA.2<br>0 | Does your organisation have professional indemnity insurance?                                                                       | Yes                                                                                                                                                                                                                                                                                                                                          |
|           | Last modified:                                                                                                                      | 2026/03/31                                                                                                                                                                                                                                                                                                                                   |
|           | Evidence:                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                |
| XA.2<br>1 | What is the limit of your organisation's professional indemnity insurance policy (in GBP)?                                          | 10.0M                                                                                                                                                                                                                                                                                                                                        |
|           | Last modified:                                                                                                                      | 2025/04/08                                                                                                                                                                                                                                                                                                                                   |
|           | Evidence:                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                |
| XA.2<br>2 | Does your organisation have employers' liability insurance?                                                                         | Yes                                                                                                                                                                                                                                                                                                                                          |
|           | Last modified:                                                                                                                      | 2026/03/31                                                                                                                                                                                                                                                                                                                                   |
|           | Evidence:                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                |
| XA.2<br>3 | What is the limit of your organisation's employers' liability insurance policy (in GBP)?                                            | 15.0M                                                                                                                                                                                                                                                                                                                                        |
|           | Last modified:                                                                                                                      | 2025/04/08                                                                                                                                                                                                                                                                                                                                   |
|           | Evidence:                                                                                                                           | 2026 TWIMC UK                                                                                                                                                                                                                                                                                                                                |

|           |                                               |               |
|-----------|-----------------------------------------------|---------------|
| <b>XB</b> | <b>Environmental, Social &amp; Governance</b> |               |
|           | <b>Question</b>                               | <b>Answer</b> |

|       |                                                                                                                                                                                                                                                                               |                                                         |
|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| XB.1  | Does your organisation have any certifications or audit reports that cover environmental, social or governance issues (such as ISO 14001, ISO 45001 or B Corporation certification)?                                                                                          | No                                                      |
|       | Answer notes:                                                                                                                                                                                                                                                                 | Recite Me do not hold any certification of this nature. |
|       | Last modified:                                                                                                                                                                                                                                                                | 2026/07/09                                              |
| XB.2  | Does your organisation have a documented environmental management policy?                                                                                                                                                                                                     | Yes                                                     |
|       | Last modified:                                                                                                                                                                                                                                                                | 2026/07/09                                              |
|       | Evidence:                                                                                                                                                                                                                                                                     | <i>Environmental-policy - Jan 26</i>                    |
| XB.3  | Does your organisation publicly share metrics related to your Environmental, Social & Corporate Governance?                                                                                                                                                                   | No                                                      |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.4  | Does your organisation conduct any activities that might be deemed as hazardous to the environment?                                                                                                                                                                           | No                                                      |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.5  | Has your organisation received any adverse media coverage, legal action, penalties or sanctions for environmental reasons?                                                                                                                                                    | No                                                      |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.6  | Does your organisation measure its scope 1, scope 2, or scope 3 emissions as per Greenhouse Gas (GHG) Protocol standards?                                                                                                                                                     | No                                                      |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.7  | What are your scope 1 emissions (tonnes of CO2 equivalent per year)?                                                                                                                                                                                                          | Not applicable                                          |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.8  | What are your scope 2 emissions (tonnes of CO2 equivalent per year)?                                                                                                                                                                                                          | Not applicable                                          |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.9  | What are your scope 3 emissions (tonnes of CO2 equivalent per year)?                                                                                                                                                                                                          | Not applicable                                          |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.10 | Is your organisation working towards a net zero carbon emissions target?                                                                                                                                                                                                      | No                                                      |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.11 | When do you expect to achieve net zero carbon emissions?                                                                                                                                                                                                                      | Not applicable                                          |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.12 | Does your organisation have a documented Health & Safety Policy?                                                                                                                                                                                                              | Yes                                                     |
|       | Last modified:                                                                                                                                                                                                                                                                | 2026/01/21                                              |
|       | Evidence:                                                                                                                                                                                                                                                                     | <i>health and safety - Jan 26</i>                       |
| XB.13 | Does your organisation have a senior manager or board member who is responsible for your Health & Safety Programme?                                                                                                                                                           | No                                                      |
|       | Last modified:                                                                                                                                                                                                                                                                | 2023/08/04                                              |
| XB.14 | Does your organisation have an established and consistent framework for Health and Safety which includes provisions to ensure a safe and hygienic working environment for all of your personnel, in accordance with local health and safety laws and industry best practices? | Yes                                                     |

|           |                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|           | Last modified:                                                                                                                                                                                                            | 2023/08/04                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
| XB.1<br>5 | Does your organisation work to a committed code of business ethics which includes ethical labour practices?                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | No  |
|           | Answer notes:                                                                                                                                                                                                             | As a small but growing business we work ethically but don't have a formalised set of documentation. We are actively working on this, which includes a labour policy document. We ensure that we work in line with employment laws for the countries we operate from.                                                                                                                                                                                                                     |     |
|           | Last modified:                                                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
| XB.1<br>6 | Does your organisation ensure compliance with all applicable human rights laws and regulations?                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Yes |
|           | Answer notes:                                                                                                                                                                                                             | We ensure all employees and our operations are compliant with these regulations. We obtain legal advice and guidance from external solicitors to ensure that we adhere to any legislative changes and our DPO also keeps updated on the latest changes which could impact us. As part of ISO 27001 and once published, our SoA will detail further our compliance to contractual, legal and regulatory requirements.                                                                     |     |
|           | Last modified:                                                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
| XB.1<br>7 | Does your organisation have policies and procedures in place that ensure the prevention of modern slavery?                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | No  |
|           | Answer notes:                                                                                                                                                                                                             | Currently, we do not have documented policies or procedures of this nature but are working towards them. As a SaaS provider, our risk of modern slavery is quite low and we only employ candidates who interview and meet our requirements. Whilst we cannot impose our requirements on our supply chain, as part of due diligence, we ensure that potential suppliers have the appropriate policies in place and are not under investigation or sanction for these types of activities. |     |
|           | Last modified:                                                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
| XB.1<br>8 | Have any incidences of modern slavery been recorded or uncovered within your organisation or supply chains in the past 12 months?                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | No  |
|           | Last modified:                                                                                                                                                                                                            | 2023/08/04                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
| XB.1<br>9 | Does your organisation provide a grievance mechanism for workers to raise workplace concerns?                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Yes |
|           | Answer notes:                                                                                                                                                                                                             | Detailed in our employee handbook.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     |
|           | Last modified:                                                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
| XB.2<br>0 | Does your organisation have a documented diversity and inclusion policy?                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Yes |
|           | Last modified:                                                                                                                                                                                                            | 2026/01/21                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
|           | Evidence:                                                                                                                                                                                                                 | <i>Diversity and Inclusion policy - Jan 26</i>                                                                                                                                                                                                                                                                                                                                                                                                                                           |     |
| XB.2<br>1 | Does your organisation provide a confidential method (also known as a whistleblowing procedure) for employees and contract staff to freely report any perceived issues that might impact your clients or their customers? |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Yes |
|           | Answer notes:                                                                                                                                                                                                             | Whilst in place, the process needs refining and further documenting.                                                                                                                                                                                                                                                                                                                                                                                                                     |     |
|           | Last modified:                                                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
| XB.2<br>2 | Does your organisation clearly inform employees and contract staff how to access and utilise the whistleblowing procedure to confidentially report any issues?                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Yes |
|           | Answer notes:                                                                                                                                                                                                             | This information is provided as part of the new joiner onboarding.                                                                                                                                                                                                                                                                                                                                                                                                                       |     |
|           | Last modified:                                                                                                                                                                                                            | 2026/07/09                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |     |
|           | Evidence:                                                                                                                                                                                                                 | <i>Whistleblower Policy - Jul 25</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |

|           |                                                                                                                                                                                                                                                                    |                                                                                                                                                                  |     |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| XB.2<br>3 | Does your organisation conduct regular assurance activities against its suppliers to ensure they are operating in line with your own environmental, social and governance policies, including checking that they are compliant with relevant laws and regulations? |                                                                                                                                                                  | Yes |
|           | Answer notes:                                                                                                                                                                                                                                                      | This forms part of our supplier management procedure, which is attached but being updated and reviewed to ensure it captures all relevant due diligence actions. |     |
|           | Last modified:                                                                                                                                                                                                                                                     | 2026/07/09                                                                                                                                                       |     |
|           | Evidence:                                                                                                                                                                                                                                                          | <i>Supplier and Third-Party Management Policy</i>                                                                                                                |     |

| XC UK Government Data & Personnel Security |                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                            |            |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
|                                            | Question                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                            | Answer     |
| XC.1                                       | Does your organisation process any client data outside the United Kingdom or European Union?                                                     |                                                                                                                                                                                                                                                                                                                                            | Yes        |
|                                            | Answer notes:                                                                                                                                    | Data is processed and stored in the US and Australia for customers who are based in these geographic areas, upon their instruction. A full list of our sub-processors can be found here: <a href="https://knowledge.reciteme.com/knowledge/recite-me-sub-processors">https://knowledge.reciteme.com/knowledge/recite-me-sub-processors</a> |            |
|                                            | Last modified:                                                                                                                                   | 2026/07/10                                                                                                                                                                                                                                                                                                                                 |            |
| XC.2                                       | Will your organisation access information classified as OFFICIAL-SENSITIVE or higher?                                                            |                                                                                                                                                                                                                                                                                                                                            | No         |
|                                            | Answer notes:                                                                                                                                    | Unless instructed by a customer, we will not process any data of this nature. Were we to be instructed, conversations would take place with the customer to understand why we were being instructed to do so and the necessary assessments would be conducted.                                                                             |            |
|                                            | Last modified:                                                                                                                                   | 2026/07/10                                                                                                                                                                                                                                                                                                                                 |            |
| XC.3                                       | Do you apply the HMG Baseline Personnel Security Standard (BPSS), or equivalent, for all individuals working with or on behalf of UK Government? |                                                                                                                                                                                                                                                                                                                                            | Yes        |
|                                            | Answer notes:                                                                                                                                    | Background checks are conducted, including employment, education, right to work and references. Where local law permits, criminal record checks will be conducted (e.g. DBS check in the UK).                                                                                                                                              |            |
|                                            | Last modified:                                                                                                                                   | 2026/07/10                                                                                                                                                                                                                                                                                                                                 |            |
| XC.4                                       | Has your organisation signed up to the UK Software Security Code of Practice?                                                                    |                                                                                                                                                                                                                                                                                                                                            | Unanswered |
| XC.5                                       | Has your organisation obtained the Defence Cyber Certification?                                                                                  |                                                                                                                                                                                                                                                                                                                                            | Unanswered |

| XD NHS Data Security and Information Governance |                                                                                           |                                                                                                                                                |                |
|-------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                 | Question                                                                                  |                                                                                                                                                | Answer         |
| XD.1                                            | Have you completed an NHS Data Security and Protection Toolkit (DSPT) self-assessment?    |                                                                                                                                                | No             |
|                                                 | Answer notes:                                                                             | Not at this stage, as no NHS Trust has required us to complete it. Should we need to complete the self-assessment, we would be happy to do so. |                |
|                                                 | Last modified:                                                                            | 2026/07/10                                                                                                                                     |                |
| XD.2                                            | What is your current DSPT standard?                                                       |                                                                                                                                                | Not applicable |
|                                                 | Last modified:                                                                            | 2026/07/10                                                                                                                                     |                |
| XD.3                                            | Has your organisation formally declared its commitment to the NHS Cyber Security Charter? |                                                                                                                                                | No             |

|  |                |                                                                                                                                                                                                                                                                                     |
|--|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | Answer notes:  | We have not signed up to the charter. However, should we be required to do so, we would review the charter and declare our commitment as necessary. Recite Me are certified to the UK Cyber Essentials and Cyber Essentials Plus certification schemes, which are renewed annually. |
|  | Last modified: | 2026/07/10                                                                                                                                                                                                                                                                          |

| XE Operational Technology (OT) Security |                                                                                                                                                                                                                                    |            |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
|                                         | Question                                                                                                                                                                                                                           | Answer     |
| XE.1                                    | Do you maintain certifications or align your OT security practices with recognised standards or frameworks such as IEC 62443, ISO 27001, or the NCSC CAF?                                                                          | Unanswered |
|                                         | Last modified:                                                                                                                                                                                                                     | 2026/07/10 |
| XE.2                                    | Do you have documented OT security policies that define roles, responsibilities, and acceptable use guidelines applicable to the OT products or services you provide?                                                              | Unanswered |
| XE.3                                    | Do you provide mandated OT/ICS-specific security awareness training for personnel involved in the design, build, or maintenance of OT systems?                                                                                     | Unanswered |
| XE.4                                    | Do you maintain an up-to-date inventory of all OT hardware and software assets (e.g., PLCs, RTUs, SCADA servers) that are within the scope of products/services you provide?                                                       | Unanswered |
| XE.5                                    | Do you maintain documentation, such as network diagrams, describing how your OT systems are segregated from enterprise IT networks (e.g., via firewalls or DMZs)?                                                                  | Unanswered |
| XE.6                                    | Are engineering workstations, configuration tools, or privileged devices managed separately from standard enterprise user devices and restricted from performing unnecessary enterprise tasks (e.g., general web browsing/email)?  | Unanswered |
| XE.7                                    | Do you maintain a list of software and firmware dependencies, such as a Software Bill of Materials (SBOM), for the OT systems you provide?                                                                                         | Unanswered |
| XE.8                                    | Is all remote access to the OT environment protected through secure, managed, and monitored access controls, and are privileged OT accounts uniquely assigned to individuals and separate from their standard enterprise accounts? | Unanswered |
| XE.9                                    | Do you test security patches in a segregated or separate test network for applicability and stability before recommending or applying them to the client's production environment?                                                 | Unanswered |
| XE.10                                   | Do you conduct regular, OT-specific vulnerability assessments or threat modelling for the systems under your management?                                                                                                           | Unanswered |
| XE.11                                   | Do you have a documented incident response playbook specifically for OT environments, including defined recovery actions?                                                                                                          | Unanswered |
| XE.12                                   | Have OT-focused incident response exercises, tabletop scenarios, or recovery tests been conducted in the last 12 months?                                                                                                           | Unanswered |
| XE.13                                   | Are OT configurations (PLC logic, SCADA settings, etc.) regularly backed up, stored securely away from the production network, and tested for restorability?                                                                       | Unanswered |