

RTG ISMS Policy

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Area of Application

Company	RTG
Department	All

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This Information Security Policy was approved and released by RTG Executive Committee.

Date

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1 Objective

This document defines the Information Security Management System (ISMS) Policy towards RWE & Turcas Güney Elektrik Üretim A.Ş.'s (RTG) organisational strategies, including ISMS objectives in the context of the international standard ISO/IEC 27001.

2 ISMS Policy

2.1 About RTG

RWE & TURCAS Güney Elektrik Üretim A.Ş. (RTG), a subsidiary of the German RWE Group, is an integrated energy company. The corporate headquarter is based in Istanbul, with a representation in Ankara as well. The core processes, power generation, are operated at a power plant in Denizli. RTG provides electricity to approximately 3,5 million residential customers and, as one of Turkey's major gas power plants, supports stability, robustness and sustainability of the Turkish power grid. That means that RTG;

- understands energy markets.
- is engaged across the whole energy value chain.
- shares expertise for the benefit of the development of the Turkish economy.
- is a trustful, innovative and environmental friendly partner.

RTG will be the centre of excellence in the region of the Turkish energy market and create sustainable value with competent and committed employees by operating a flexible and innovative business model along the value chain. That means that RTG:

- will adapt to the Turkish market.
- will transfer the RWE expertise and best practice to its Turkish team.
- aims to achieve organic growth and profit in the Turkish and neighbouring energy markets.
- will be the "the place to be" for market participants and a reliable and respected partner for the community.
- will be an attractive employer with high leadership activity and a high level of individual competence within its staff.
- aims to benefit from a flexible business model to exploit business cycles.

2.2 Purpose of the ISMS

Information is a sensitive value asset for RTG. Information security provides measures to ensure the confidentiality, availability and integrity of all information at RTG. These measures apply equally to information in analog form - written or printed and the "spoken word" - as well as in digital form.

For the purpose of sustaining our adherence to our values and in accordance with above standards, RTG established an ISMS to sustain and improve information security. By doing so RTG strengthens the trust with our partners, employers, community bodies and regulatory authorities. RTG aims to maximize productivity in the most secure manner by ensuring information security and improving security processes.

Energy industry in Turkey is nominated by regulatory bodies as one of those branches operating critical infrastructure. Subsequently RTG aims to secure its industrial control

systems and related information by operating in compliance with ISO/IEC 27001 to support a nation wide robust and manageable information security environment.

2.3 Objectives of the ISMS

RTG's ISMS aims to ensure sustainability of industrial control systems and related corporate information systems in terms of ensuring availability, integrity and confidentiality of information processed or kept by RTG as required.

Following objectives were identified to support this goal:

- Make information security a part of business strategy, aligned with business goals.
- Use, develop and implement appropriate policies and processes while considering the protection of the industrial control systems and the organization's information assets from internal and external threats.
- Continually improve the Information Security Management System through the establishment and regular review of measurable security objectives and related KPIs.
- Comply with business and legal regulatory requirements and contractual security obligations.
- Implement appropriate measures for protection of confidential information against unauthorized access and misuse.
- Ensure confidentiality, integrity and availability of data and effectively manage information security incidents and vulnerabilities and take necessary actions to prevent reoccurrences. Ensuring availability of information for authorized people when needed, especially with regards to information needed for operation of RTG's power plant in Denizli.

RTG also aims to respect to the privacy of its employees. However, it has audit right on the operations done by employees and information processed, transmitted or worked on by employees using RTG information systems including industrial control systems.

2.4 Structure of the ISMS and Executive Commitment

The RTG Executive Committee holds the accountability for the ISMS and this ISMS Policy is supported and released by its members. Further policies or procedures for implementation and operation of the ISMS are developed and published accordingly.

Organizational structure of ISMS at RTG is designated in Appendix 1 at the end of this policy document.

ISMS responsibilities are shared among different parties:

- RTG Executive Committee is accountable for overall information security and ISMS at RTG.
- Head of Security Generation SE, parent enterprise to RTG, is responsible for all security matters including, but not limited to information security and ISMS. The Head of Security Generation SE reports to the ExCom of RTG as well as the board of RWE Generation SE.
- RWE Generation SCADA Security Management is responsible for general SCADA security in major SCADA security policies within RWE.

- ISMS Management RTG is responsible to manage and organise the overall ISMS RTG and the local contact for IT related ISMS at RTG.
- ISMS contact Denizli CCPP is responsible for organising ISMS at power plant Denizli and the local contact for OT related ISMS at RTG.
- innogy Group Security Cyber Security supports RTG in operations and improvements of their ISMS.
- RWE IT GmbH is the major external service provider. Its executive management is responsible to maintain and operate all IT services provided in compliance with ISO 27001 standard.

This ISMS Policy has been accepted and signed with leadership's full support.

All employees are requested to adhere to this policy and derived documentation. Any violation may be subject to disciplinary action.

2.5 Operation of the ISMS

The ISMS is operated in alignment with RWE's Information Security Policy and strategic approach to risk.

Security risk evaluation criteria are documented in the Information Security Risk Management Procedure. Executive Committee of RTG is owner of all risks handled in risk assessment process.

Records are maintained in order to demonstrate continuous improvement and ongoing management commitment.

2.6 Performance Evaluation

The performance of the ISMS and fulfilment of the objectives are measured by certain elements in the process.

These can be listed as follows:

- Set of key performance indicators in relation with the defined objectives
- Regular internal and external security checks such as self-assessments, security audits
- Internal audit program
- Management reviews

Performance evaluations and measurement of defined objectives are important to the ISMS and can be part of other executive level interactions other than on occasions defined above.

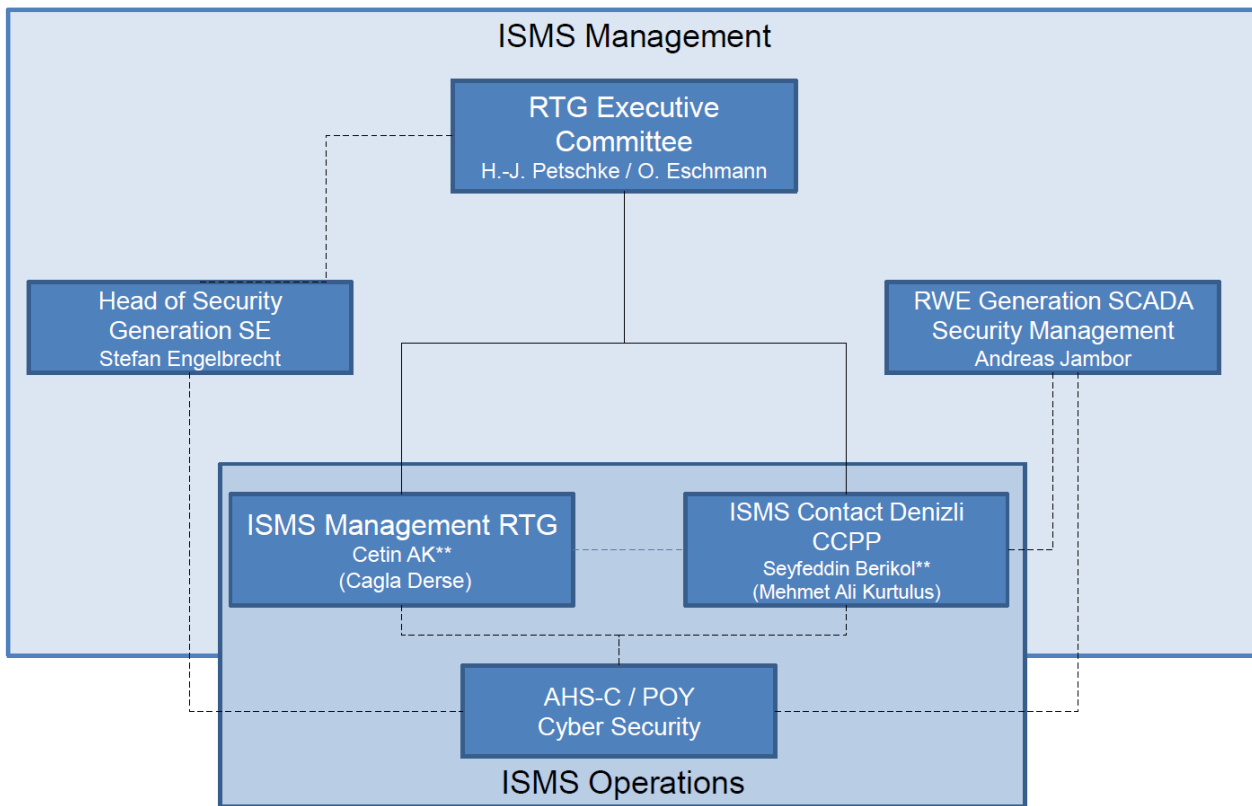
3 Control of Document

Activity	Dept. Code	Name	Date	Signature
Prepared	EUD-T-O	Çetin Ak	2015/12/08	Signed.
Reviewed	COE-D	Boris Beuster	2015/12/15	Signed.
Consistency check	GED-O	Kai Hinterthan	2015/12/15	Signed.
Approved by RTG	EUD-T	Hans-Jürgen Petschke	2015/12/15	Signed.
Reviewed	EUG-TF-FIT	Cetin Ak	2017/01/26	Signed.
Reviewed	EUG-E-FIT	Cetin Ak	2018/02/01	Signed.
Reviewed	EUG-E-FIT	Cetin Ak	2019/01/30	Signed.

Change Log

#	Date	Page	Change/Adaptation
1.0	2015/12/15	-	First release
1.1	2015/12/15	1, 3, 6	Changed introduction, Clarify reporting line for Security Manager, added explanations for lines and brackets
1.2	2016/12/02	4, 6	Review, reflect organisational changes
1.3	2017/01/26	all	Minor changes to reflect changes of the organisation and titles
1.4	2018/02/01	all	Minor changes to reflect changes of the organisation and titles
1.5	2019/01/30	6	Organizational Structure has been updated.

4 Appendix 1 - RTG ISMS Organization Structure



Regular lines symbolize reporting and management within RTG
Dotted lines symbolize reporting and collaboration with RWE Group companies
Names in brackets show deputy