

**Port of Houston Authority  
CYBERSECURITY POLICY  
MARCH 2025**



A. Purpose.

This Cybersecurity Policy (the “Policy”) is intended to establish, implement, and manage a cybersecurity program at the Port of Houston Authority (“Port Authority”) based on the National Institute of Standards and Technology (“NIST”) Cybersecurity Framework for Improving Critical Infrastructure Cybersecurity.

B. Framework.

The Port Authority will follow the recommendations made by the United States Coast Guard, Navigation and Vessel Inspection Circular (NVIC) to develop and implement a cybersecurity program that analyzes computer and cyber-risks and provides guidance for addressing those risks. This federal guidance will also be used as a benchmark to develop and implement measures and activities for effective ongoing self-governance of cyber risks.

C. Policy Statement.

It is the intention of the Port Authority to manage the use, operation, and operational risk of Port Authority information systems through the implementation of information system security standards, procedures, and guidelines. The implementation of these items should:

1. Provide for the protection of the confidentiality, integrity, and availability for all authorized users, of Port Authority information and information systems;
2. Improve the Port Authority’s current cybersecurity state and compliance ratings, through the mitigation of weaknesses and vulnerabilities identified through the NIST Cybersecurity Framework process; and
3. Establish a process for the Port Authority to determine the levels of cyber risk acceptable to it, identify the risks it faces exceeding those levels, and take measures to mitigate those risks.

D. Authority of the Port Commission and Delegation of that Authority.

1. The Port Commission is responsible for establishing this Policy and guiding executive staff actions and decisions related to cybersecurity requirements and the development and implementation of a cybersecurity program. This Policy is not intended to constrain the discretion of the Port Commission, which may amend this Policy at any time for any reason, and must approve all amendments to this Policy.
2. Except with respect to duties and responsibilities that may only be carried out by it, the Port Commission hereby delegates to the Chief Executive Officer, and his or her designees, the responsibility for the establishment, implementation, and management

of the cybersecurity program and its associated activities as provided herein.

E. Policy Implementation.

1. Port Authority staff shall develop and enforce appropriate cybersecurity requirements for its facilities, personnel, information systems, system resources, and other information technology assets.

2. Port Authority executive leadership shall determine whether a cybersecurity requirement is applicable or not to particular information technology assets, or if an exception to the requirement is permitted. The applicability of, or exceptions to cybersecurity requirements shall be determined in accordance with the policy statement set forth in Section C above.

3. Staff shall prepare, and from time-to-time review and update, standards and procedures consistent with this Policy for staff's administration of the Policy, which shall among other things:

a. Establish a dedicated point of control and coordination for the Port Authority's cybersecurity program and activities;

b. Identify the Port Authority's current cybersecurity state and future cybersecurity objectives and goals toward a target state; and

c. Implement capabilities for continuous improvement and assessment of progress toward the target state.

4. Except as provided herein or as otherwise determined by the Chief Executive Officer, the Chief Information Officer, or his or her designee, in consultation with the Port Authority Information Technology Governance Council, is responsible for this Policy's implementation and interpretation.

F. Adoption.

This Policy was adopted by the Port Commission on March 25, 2025, as evidenced by Minute No. 2025-0325-54.

Policy Owner: Port of Houston Authority - Information Technology Policy  
Version: 2.0