

CONFIDENTIAL

# The Home Depot, Inc.

## Cybersecurity Program Summary

Risk Management, Strategy & Governance | Fiscal 2024 (ended February 2, 2025)

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*This document summarizes The Home Depot's cybersecurity risk management strategy, program structure, and governance framework as disclosed in its most recent Form 10-K filing with the SEC. Data retrieved directly from SEC EDGAR.*

## At a Glance

COMPANY	FRAMEWORK	24/7 SOC	BOARD REPORTING	CISO TEAM	MATERIAL INCIDENTS
<b>Home Depot</b>	<b>NIST CSF + PCI-DSS</b>	<b>Active</b>	<b>Quarterly</b>	<b>500+</b>	<b>None</b>
NYSE: HD   World's largest home improvement retailer	Primary standards adopted	Around-the-clock Security Operations Center	Board + Audit Committee	Dedicated cybersecurity associates	No material incidents in fiscal 2024

The Home Depot is the world's largest home improvement retailer, operating approximately 2,340 stores across the U.S., Canada, and Mexico with over 470,000 associates. Its cybersecurity program is built on the NIST Cybersecurity Framework and PCI-DSS standards, led by a CISO with 20 years of experience and over 500 dedicated cybersecurity associates, supported by three management-level governance committees and active Board and Audit Committee oversight. No material cybersecurity incidents were reported in fiscal 2024.

**Key Context:** Home Depot discloses this program having previously experienced a significant data breach in fiscal 2014 that affected approximately 56 million payment cards. That event has clearly shaped the company's substantial investment in its current cybersecurity infrastructure — including a 500+ person security team, 24/7 SOC, annual third-party maturity assessments, and a structured three-committee governance framework.

## 1. Risk Management & Strategy

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The Home Depot operates a cybersecurity program integrated directly into its broader enterprise risk management framework. The program prioritizes threat mitigation while maintaining system integrity and resilience, built on two primary standards: the NIST Cybersecurity Framework and PCI-DSS.

### Six Program Elements

#### Monitoring & Mitigation

Internal teams conduct targeted audits and penetration tests throughout the year. Third parties independently evaluate cybersecurity maturity annually and perform risk assessments. A 24/7 Security Operations Center detects, mitigates, and responds to cyber threats. Policies and procedures are reviewed periodically for regulatory alignment.

#### Incident Response Team (IRT)

A cross-functional IRT has the expertise, authority, and resources to investigate, coordinate response, remediate, and communicate regarding incidents. The IRT follows a detailed incident response plan covering triage, severity assessment, escalation, containment, investigation, and remediation. Annual tabletop exercises simulate incident responses and findings are used to improve plans and technologies.

#### Data Classification & Retention

Classification and retention policies are established specifically to limit the risk of unauthorized exposure of customer, associate, and business data — reflecting Home Depot's experience as a large-scale retailer handling significant volumes of consumer payment and personal data.

#### Vendor Security

A vendor risk management program classifies service provider and business partner risk based on data type accessed and retained. Security diligence and risk assessments are performed for certain vendors using a risk-based approach, with appropriate cybersecurity obligations included in contractual arrangements.

#### Training & Awareness

Data security and privacy training is provided to all associates upon hire and annually thereafter. Role-based training is provided to targeted internal audiences. Periodic awareness campaigns and regular phishing email simulation tests reinforce training and promote ongoing awareness.

#### Cyber Insurance

Cyber insurance is maintained to provide financial protection against losses arising from significant security incidents — an important backstop given the company's scale as a large-format retailer handling consumer payment data across thousands of store locations.

## 2. Governance & Leadership

### CISO Profile

<b>Role</b>	Chief Information Security Officer (CISO)	<b>Reports To</b>	Chief Information Officer (CIO)
<b>Joined HD</b>	2021 (consultant since 2019)	<b>Team Size</b>	500+ dedicated cybersecurity associates
<b>Prior Experience</b>	Nearly 20 years at a leading professional services firm advising clients on information security strategy and implementation	<b>Industry Expertise</b>	Diverse industries — company, customer and associate data protection across multiple sectors
<b>Certifications</b>	CISM (Certified Information Security Manager) CISSP (Certified Information Systems Security Professional) CIPP (Certified Information Privacy Professional)	<b>Education</b>	Bachelor of Science Information Systems

### Three-Committee Governance Structure

Home Depot operates a notably structured three-tier management-level governance framework for cybersecurity, privacy, and data governance — one of the more formally defined committee structures in the peer group:

Committee	Composition & Cadence	Role & Reporting
<b>Data Security &amp; Privacy Governance Committee</b>	Chaired by VP — Internal Audit & Corporate Compliance. Cross-functional senior leaders including CEO. Meets quarterly.	Primary management-level governance body. Covers cybersecurity priorities, emerging risks, training, risk mitigation, and regulatory compliance. Reports to Board/Audit Committee.
<b>Security &amp; Technology Risk Leadership Committee</b>	Chaired by CISO. Technology leaders + cross-functional representatives. Meets monthly or bi-monthly.	Provides leadership and oversight of the cybersecurity program. Reports to the Data Security & Privacy Governance Committee.
<b>Privacy &amp; Data Governance Committee</b>	Chaired by Chief Privacy Officer. Cross-functional group across ~20 departments. Meets monthly or bi-monthly.	Provides leadership and oversight of privacy and data governance programs. Reports to the Data Security & Privacy Governance Committee.

### Board Oversight

Body	Role	Frequency	Scope
<b>Board of Directors</b>	Joint with Audit Committee	Quarterly	Receives quarterly reports on privacy, data protection & cybersecurity from CIO, CISO, and Chair of Data Security & Privacy Governance Committee. Held a dedicated cybersecurity meeting in fiscal 2024.
<b>Audit Committee</b>	Primary oversight responsibility	Quarterly + ad hoc	Has primary responsibility for overseeing cybersecurity and privacy risks. Receives quarterly reports. Periodically receives presentations from third-party cybersecurity experts.

**Governance Strength:** Home Depot's quarterly Board and Audit Committee reporting cadence, combined with a dedicated full Board cybersecurity meeting in fiscal 2024, reflects an above-average governance posture. The three-committee management structure — with cross-functional membership including the CEO on the top committee — ensures cybersecurity is embedded in business decision-making at the highest levels.

### 3. Program At-a-Glance Scorecard

Designated CISO (CISM, CISSP, CIPP)	Confirmed	500+ Person Cybersecurity Team	500+
NIST CSF Framework Adopted	Confirmed	PCI-DSS Compliance	Confirmed
24/7 Security Operations Center	Active	Annual Third-Party Maturity Assessment	Annual
Internal Penetration Testing	Confirmed	Formal Incident Response Team (IRT)	Confirmed
IRT Tabletop Exercises (Annual)	Annual	Detailed Incident Response Plan	Confirmed
Vendor Risk Management Program	Confirmed	Risk-Based Vendor Assessments	Confirmed
Contractual Vendor Security Obligations	Confirmed	Data Classification & Retention Policies	Confirmed
Mandatory Annual Associate Training	Annual	Phishing Simulation Testing	Confirmed
Role-Based Cybersecurity Training	Confirmed	Board & Audit Committee Oversight	Confirmed
Quarterly Board Reporting	Quarterly	Dedicated Board Cybersecurity Meeting	Confirmed
Three-Committee Governance Structure	Confirmed	CEO on Governance Committee	Confirmed
Chief Privacy Officer Role	Confirmed	Cyber Insurance Coverage	Active
No Material Incidents (Fiscal 2024)	None		

### 4. Key Observations & Benchmarking Notes

#### 500+ Person Dedicated Cybersecurity Team

Home Depot's 500+ associate cybersecurity team is among the largest disclosed in this peer group, reflecting the company's scale and the lessons learned from its 2014 data breach. This level of staffing signals a mature, enterprise-grade security operation that most companies — including many Fortune 500 peers — cannot match.

#### Three-Committee Management Governance — Uniquely Structured

The three-tiered committee framework — with the CEO on the top committee, the CISO chairing the security committee, and the Chief Privacy Officer chairing the privacy committee — is one of the most formally structured management-level cybersecurity governance frameworks observed in the peer group.

### Dedicated Full Board Cybersecurity Meeting

In fiscal 2024, the Board held a meeting dedicated solely to cybersecurity topics — beyond the standard quarterly reporting. This is a leading governance practice that signals Board-level seriousness about cybersecurity as a strategic risk, not just an IT matter.

### CISO With Retail & Multi-Industry Experience

The CISO's background spans a professional services firm where he advised clients across multiple industries on cybersecurity. His CISM, CISSP, and CIPP certifications cover security, systems, and privacy — a comprehensive credential set.

### Annual Tabletop Exercises — Explicitly Confirmed

Home Depot explicitly confirms annual IRT tabletop exercises and states that findings are used to improve processes, plans and technologies — closing the gap between a written IRP and an operational one.

### Program Shaped by 2014 Breach

Home Depot's cybersecurity investment — 500+ team, 24/7 SOC, annual third-party assessments — visibly reflects lessons learned from the 2014 breach affecting 56 million payment cards. The current program represents a company that has fundamentally rebuilt its security posture in direct response to that event.

*Source: The Home Depot, Inc. — Annual Report on Form 10-K, filed March 20, 2025. Fiscal 2024 (ended February 2, 2025). SEC EDGAR: <https://www.sec.gov/Archives/edgar/data/354950/000035495025000085/hd-20250202.htm> | Prepared: May 14, 2026 | For Internal Distribution Only*