**Atea ASA**

# Information Security Policy

Information is essential to the functioning of any organization. An information security management system (ISMS) is a set of policies, processes, procedures, tools, and activities which an organization uses to protect its information assets from unauthorized access and misuse.

Atea is a large organization spread across seven countries and is the leading provider of information technology in the Nordic and Baltic regions. Atea designs, implements, and operates IT infrastructure solutions. At the same time, we understand the risks inherent in technologies which store and process ever more information.

As organizations handle more data and automate processes through their IT systems and networks, they face greater threats from data theft, identity fraud, and operational disruption through cyberattacks. Maintaining strict standards of information security is essential to our business at Atea, and to our ability to work with customers and partners on the most important IT challenges in our region.

## Purpose

This policy sets out Atea ASA and its business unit (hereinafter – Atea Group) principles for information security and approach to managing its information security to protect Atea Group's and its customers' information and information systems.

Senior management of Atea Group is committed to ensuring a high level of information security in accordance with applicable laws and regulations, contractual requirements based on information security risk assessment considering measured risk appetite and tolerance.

## Scope

This policy applies to Atea Group, including all business units, employees, and suppliers. This policy is supported by several topic-specific policies, processes, and procedure documents.

## Definition

Information security is the protection of Atea's and our customers' information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction to provide confidentiality, integrity, and availability. Protection of information and information systems is achieved by implementing suitable organizational, administrative, and technical measures described in this policy and related documentation which all together forms Atea Group's information security management system.

Atea Group's information security policies, processes and procedures shall follow the CIA triad model, meaning that information and information systems must have the properties of confidentiality, integrity, and availability. .

- Confidentiality - a property ensuring that information is not made available or disclosed to unauthorized individuals, entities, or processes.

- Integrity - a property ensuring that information is accurate and complete.

- Availability - a property ensuring that information or information systems are accessible and usable upon demand by an authorized entity.

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## Information Security Objectives

Atea Group information security objectives are set and reviewed annually to support Atea business strategy and to align with broader business goals. Atea Group business units should establish, maintain, and monitor measurable objectives in support of the overall Atea Group information security objectives.

**Atea Group information security objectives**

- Protect the confidentiality, integrity and availability of information assets belonging to Atea, its customers and its partners.

- Implement effective technical and organizational controls to minimize both the likelihood and impact of security incidents and data breaches.

- Ensure compliance with relevant laws and regulations governing information security and personal data protection, in the roles of service provider, data controller and data processor.

- Protect Atea's reputation and enhance its brand value.

- Increase customer and stakeholder confidence in Atea's ability to safeguard entrusted information assets.

- Enhance awareness among all personnel and suppliers regarding information security, privacy and associated risks and threats.

- Provide a structured approach to information security and ensure its continuous improvement.

## Execution

The controls that modify information security risk shall be determined based on risk assessment, balancing the possible business impact of a certain threat against the cost of implementing security measures. The remaining risk after application of a control shall be low enough to be acceptable, i.e. equal to or below the defined risk appetite. To achieve the objectives of information security and subject to continuous improvement, applied controls shall be monitored for efficiency.

This policy shall be made available to all employees via Atea Group's intranet. For relevant third parties this policy shall be published on Atea's website. Managers must ensure that all subordinate personnel have read and understood this policy.

## Information Security Management System

To manage information security, Atea Group has an information security management system based on the ISO/IEC 27001 standard.

Business units can, if needed, have local information security managements systems in place supplemented by local information security management. Subject to continuous improvement and overall Atea Group's business strategy, existing local information security management of business units shall be merged gradually into one common information security management system of Atea Group.

To continuously improve the information security management system, an annual information security plan shall be prepared considering past performance of the information security management system, analysis of past incidents, new guidelines from relevant authorities, changing threats, changes in legal landscape and other changing conditions.

## Roles and responsibilities

- Ultimately responsible for information security is the Atea ASA CEO.

- Atea ASA CEO has delegated responsibility for information security to the COO of Atea ASA. The COO has the right to approve this policy subject to delegated responsibility for information security.

- Atea Group information security management responsibility is delegated to Group CISO. Group CISO has the right to approve topic-specific policies and other ISMS documentation.

- Business unit responsibility for information security is delegated by the Atea ASA COO to the local Business unit responsible.

- The Information Security Executive Council is established to make strategical and tactical decisions regarding information security of Atea Group.

- Each Business unit in scope shall have a responsible for the operation of information security management system in the business unit.

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