

Atea's Commitments to NIS2

Purpose

The purpose of this document is to:

- Outline how Atea meets the requirements of the NIS2 Directive across all mandated areas.
- Communicate the commitment to all relevant stakeholders and interested parties, including management, customers, regulatory bodies and employees.

Background

On 16 January 2023 the Revised Network and Information Systems Directive (NIS2 Directive) entered into force. As Atea operates in the digital infrastructure and ICT service management sectors it is important that the organization ensures compliance with the NIS2 Directive and any related applicable legislation.

Atea commits to fulfilling all requirements outlined in the NIS2 Directive by implementing a comprehensive risk management framework, robust incident response and reporting processes, supply chain security processes, and employee training. This document provides an overview of Atea's alignment with each of NIS2 Directive's mandates, demonstrating our commitment to cybersecurity and resilience across all critical operations.

Organizational Overview

Entity Classification

Atea is classified as an essential entity operating in the digital infrastructure and ICT service management sectors. Atea offers a wide range of IT services including cloud computing, data center and managed IT services and therefore, is subject to NIS2 Directive.

Compliance Governance

Atea has established an Information Security Management System (ISMS) which serves as the backbone of security governance including compliance with applicable cyber security legislation. Controlling compliance with NIS2 Directive and relevant applicable laws is the responsibility of Atea Group Security organization. Read more about the Atea Group Security organization [here](#).

Compliance with applicable security laws and regulations is controlled at a minimum annually by performing internal / external security audits and assessments.

Framework and standard adoption

Atea manages information security according to internationally recognized standards and is ISO 27001 certified. See the latest certificates [here](#).

Jurisdiction

Atea operates in Norway, Sweden, Denmark, Finland, Estonia, Latvia, and Lithuania, with its corporate headquarters and holding company Atea ASA established in Norway. Following article 26 of NIS2 Atea ASA will designate a representative in Sweden (Atea Sverige AB) and be subject to Swedish jurisdiction considering that the Atea's Swedish entity is with the highest number of employees in the European Union.

Atea's Statement on NIS2 Areas

Risk Management

Atea has established a robust Information Security Risk Management Process that is operational across all countries where Atea operates. The Information Security Risk Management Process enables Atea to implement appropriate risk management measures proportionate to the risk posed to networks and information systems.

Atea has established an Information Security Executive Council (ISEC) consisting of Atea COO, Atea Group CISO, AMS Executive Vice President and Atea Group CIO. This governance body is established to make strategic and tactical decisions regarding cybersecurity at Atea and ensure strategic oversight of cybersecurity risks and risk management measures.

Atea Group CISO reports to ISEC on a quarterly basis regarding cybersecurity risks, their treatment plans and management measures.

Incident Detection and Response

- **Atea's Preparedness:** Atea's incident management process is robust and well-structured, ensuring swift and effective responses to security incidents. The Incident Management team is at the core of this process, managing complex incidents and ensuring effective containment and recovery.
- **Incident Management Team:** The Incident Management team is composed of skilled professionals trained to handle various types of security incidents. They follow a predefined Incident Response Plan, which outlines the steps from detection to recovery. This team is responsible for incident assessment, containment, eradication, and recovery efforts.
- **Escalation:** When an incident is detected, the Incident Management team conducts an initial analysis to determine its severity and impact. If the incident is significant, it is escalated to Group Security. Group Security ensures that appropriate measures are taken and that the incident is reported in compliance with NIS2 timelines.
- **Compliance with NIS2 timelines:** Atea adheres to the NIS2 Directive by ensuring that initial notifications are sent within 24 hours of detection, followed by detailed reports within 72 hours, and comprehensive final reports within

one month. This structured approach ensures that all incidents in scope are managed efficiently and in compliance with regulatory requirements.

Supply Chain Security

Atea has established a Supplier Relationship Policy and supplementing processes to address information security in supplier relationships.

- **New suppliers:** All new suppliers delivering services or products to Atea are subject to validation for acceptance by Atea Demand Process which includes vendor assessment and security validation of the vendors in scope. The Atea Procurement process finalizes contractual agreements, eventual due diligence and vendor onboarding.
- **Current suppliers:** Vendors are subject to annual contract review and security review.

Access Management and Personnel Security

Access management and personnel security adheres to Atea ISMS requirements and are controlled by ISO 27001 certification.

NIS2 training is part of Atea's continuous employee security awareness training program.

System Security and Operational Controls

System security and operational controls adhere to Atea ISMS requirements and are controlled by ISO 27001 certification.

Read more about Atea System Security and Operational Controls [here](#).

Business Continuity and Disaster Recovery

All business units within Atea are tasked with responsibility for business continuity planning. Atea maintains a crisis management program at both the Group and business unit levels. This program serves as the foundation for handling crises and encompasses business continuity, supported by underlying disaster recovery plans. Business continuity and disaster recovery plans are tested regularly to ensure business operation and system recovery efficiency.

Policy and Documentation Review

Atea's security policies and security governing documentation are reviewed annually or when significant changes in threat or regulatory landscape occur. All documentation is version controlled and maintained in accordance with ISMS Document Management and Control Procedures.

Continuous Improvement

Atea is committed to continuous improvement involving regular assessment and enhancement of security measures to address the threats, risks and regulatory changes.

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