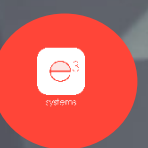
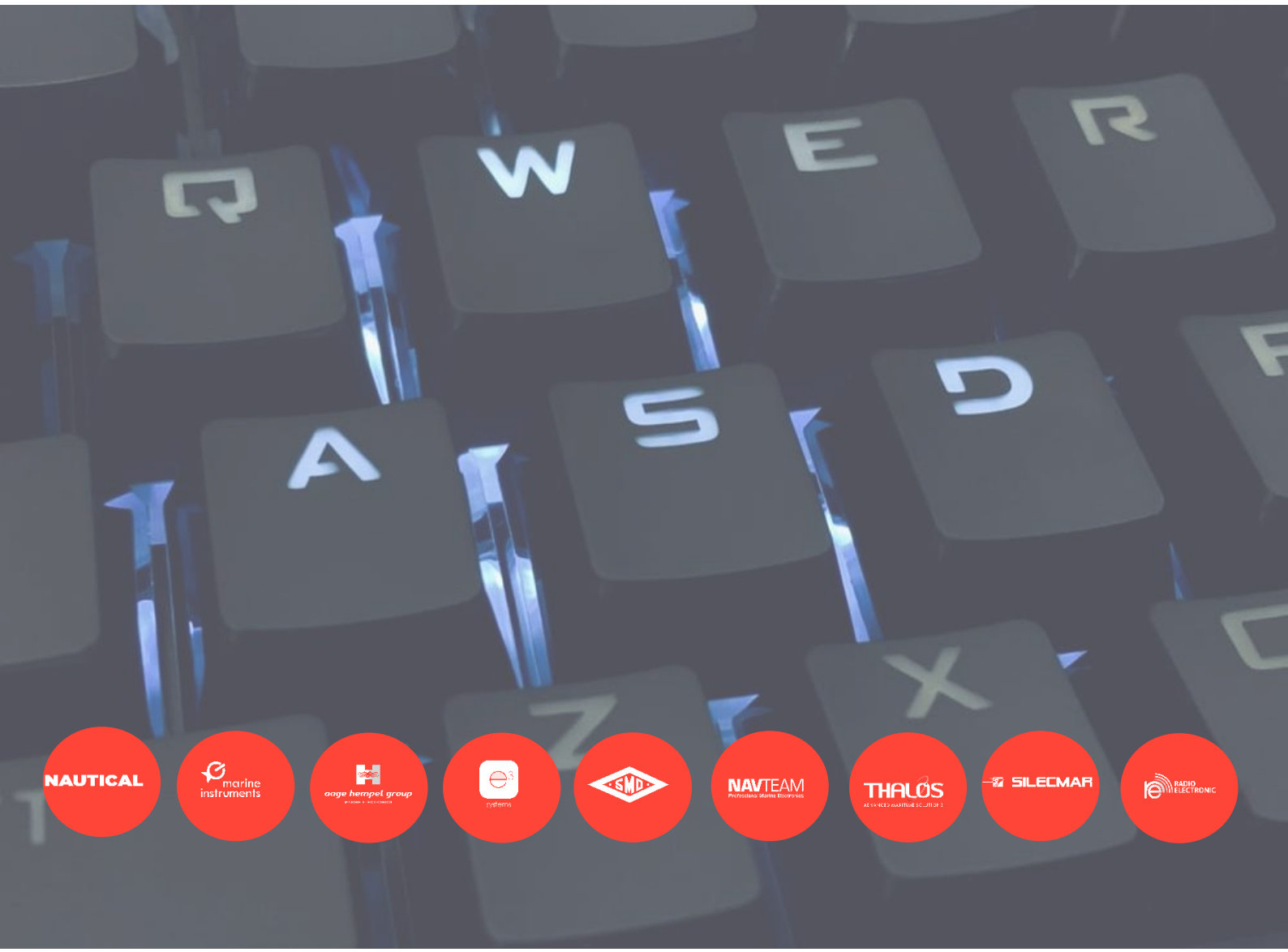




# GRUPO ARBULU

## INFORMATION SECURITY POLICY

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## INTRODUCTION

Information security is a cornerstone in the development of the activities of Grupo Arbulu, and it is directly related with the proper operation of all our systems and services. Therefore, we consider it essential to comply with legal and contractual requirements and to adopt international standards of best practice related with information security. Our steadfast orientation towards our customers drives us to treat their information with the higher degree of diligence and responsibility. Thus, it is imperative for the advancement and continuity of our business to ensure the integrity, confidentiality and availability of the information that we process. The following principles, which comprise the security policy established by the Direction of the Group, will be applicable to all operations, services, assets, resources and stakeholders involved in whatever business processes of all the companies that form part of Grupo Arbulu.

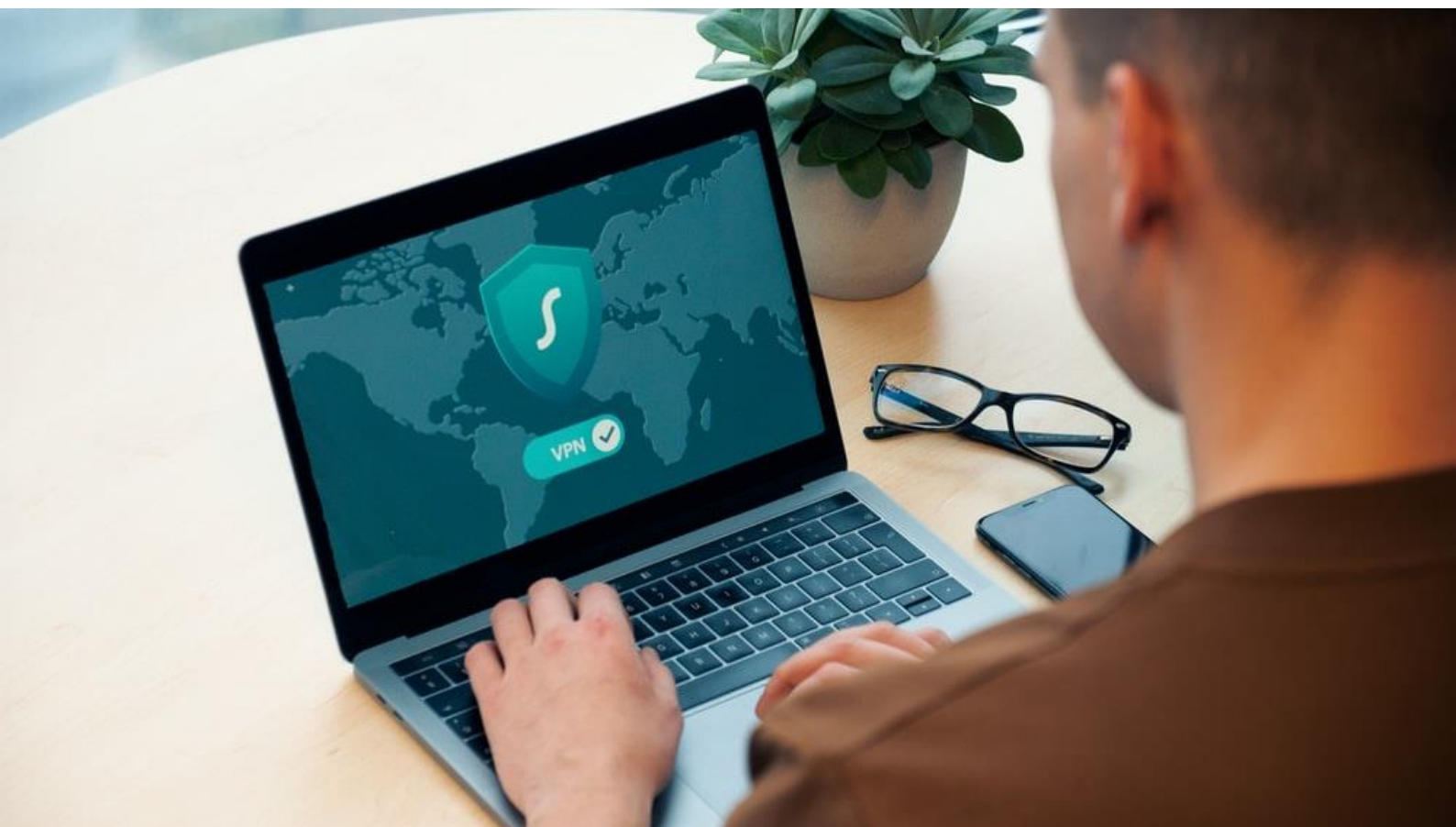




## PRINCIPLES

All the directors of the companies of the Group and the managers of their different departments will enforce this policy in their respective field of activity and will be accountable for its compliance by their teams.

- Leadership by the direction of each company, ensuring that the security goals are aligned with the strategy of each organization, and declaring the steadfast commitment of its directors with the policies stemming from these goals.
- Compliance with the applicable regulation and the international standards of good practice, as well as with all requirements that the organization agrees to establish to maintain an Information Security Management System oriented to a continual improvement of its rules of procedure.
- Matching the needs and expectations of customers, suppliers, employees, public bodies and other stakeholders involved in the scope of the information security, always preserving its availability, integrity and confidentiality.





- Assigning the necessary functions and responsibilities in the field of information security and providing the support required for their performance.
- Adopting the continuous improvement as a primordial mechanism for the evolution and adaptability of the organization.
- Implementing effective and efficient security measures.
- Establishing and reviewing the level of security regularly, on the basis of comprehensive, systematic and standardized risk assessments.
- Training, raising awareness and motivating the teams on the importance of complying with the requirements in matters of information security.
- Consider the information security in our relations with suppliers and subcontractors

Grupo Arbulu has appointed an Information Security Leader in order to boost this policy and to provide advice and guidance on its implementation to all the members of the direction.

Iñaki Arbulu- CEO & MANAGING DIRECTOR





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