

INFORMATION POLICY

For approval by the Board of Directors of ISA CTEEP on December 1, 2020

PURPOSE

To state the corporate decisions guiding the management of information and knowledge as critical and strategic assets for business development in their present and future needs, which must be maintained and safeguarded in order to ensure sustainability, capture synergies and drive the business continuity of ISA CTEEP and its subsidiaries.

DECLARATIONS

- We establish information protection mechanisms, complying with the rules regulating ISA CTEEP and its subsidiaries, especially those whose business line includes third-party information hosting and services, based on the criteria of availability, integrity, confidentiality, transparency and reliability.
- We treat confidential information of internal or third-party sources, especially data about our employees, with due rigor, ensuring compliance with Habeas Data and the protection of personal data of our stakeholders.
- We establish knowledge management strategies and practices that enable us to capture, maintain and transfer institutional knowledge and memory.
- We recognize the intellectual works, creations and inventions of our employees and other information and knowledge assets since these are part of the property rights and the corporate property of ISA CTEEP and its subsidiaries.
- We comply with and respect the laws on intellectual and industrial property, information management and exchange, as well as the relevant conventions, agreements and treaties and the voluntary commitments undertaken by ISA CTEEP and its subsidiaries.
- We recognize cyber risks that could threaten information security and strive to manage them according to the norms in force, as well as the requirements set by our clients and the market, for which we train the employees in our companies on this subject and deploy technological mechanisms and processes to mitigate them.
- We implement mechanisms to mitigate the leakage of information and control the way users share it safely. For this, we restrict access to file sharing sites and mass storage mailboxes other than those previously defined, and limit the use of removable media, such as flash drives or external HDs.
- We assign information use and access privileges according to profile, functions and responsibilities.

- We promote the responsibility of our employees towards information and knowledge management, ensuring their compliance with defined criteria and continuous improvement.

ROLES AND RESPONSIBILITIES

- All employees of the organization are responsible for applying this policy in their area of operation, in accordance with the management models, internal regulations and protocols defined for this purpose.
- Each group company is fully responsible for evaluating, classifying and determining the treatment of information, considering, among others, its characteristics of confidentiality, integrity and availability. Moreover, we must manage the risks related to information and knowledge protection within the scope of the corporate model.

Rui Chammas
Chief Executive Officer

