

# **FINTECH OS**

## **STATEMENT OF MANAGEMENT ON**

### **INFORMATION SECURITY POLICY**

Information resources, services, human resources, systems and their supporting infrastructure are strategic resources of FintechOS. Compromising these resources may lead to breaches of contract terms, compromising customer position, impairing FintechOS' credibility and ability to achieve its objectives. Information Security contributes to the achievement of FintechOS' mission and objectives by identifying and preventing risks, vulnerabilities and threats to information resources, services, systems, processes and related infrastructure.

The management of FintechOS will take all necessary measures to protect information resources against internal or external threats, deliberate or accidental, throughout the life of the information cycle, to ensure that:

- The information is protected against unauthorized access;
- The information is accessible only to the persons authorized to access it - confidentiality;
- The information is protected against unauthorized operations, ensuring the accuracy and protection of the information content – integrity;

- The information is available and can be used when needed, and the systems that provide it can properly deal with security attacks and there are means to ensure operational continuity - availability;
- Transactions and information exchanges with other locations of the organization, with partners or customers are reliable - authenticity and non-repudiation;
- Organizational requirements and objectives are met;
- Legislative and regulatory requirements are fulfilled.

Based on the existing document, FintechOS adopts a set of Information Security Policies, which details the general principles on the protection of information resources in specific areas: internal organization, third party relations, human resources management, physical security, communications and operations management, access control, management security incidents, business continuity, ensuring compliance with internal rules and legal, regulatory and contractual rules.

FintechOS operates an Information Security Management System (ISMS) to ensure that:

- Information security risks are identified, assessed and managed;
- Suitable security measures are implemented, maintained and improved;
- Policy objectives are fulfilled.

The management of FintechOS through this declaration commits to:

- Supporting other relevant leadership roles in demonstrating their skills in their area of responsibility;
- Integrating the requirements of the information security management system in the organization's processes;

- Establishing communication channels on the importance of efficient management and compliance with the requirements of the information security management system;
- Identify, evaluate, treat and review information security risks that may affect the organization;
- Analyze the external and internal context in which the organization evolves in order to adapt ISMS policy and objectives to the new context;
- Create the framework for the continuous improvement of ISMS through monitoring measures and assessment of the performance of the actions taken.

This policy applies without discrimination to all persons / organizations / entities who have been granted access to any of the information resources, services, systems and related infrastructure within FintechOS:

- Employees with a fixed-term or indefinite employment contract;
- The organization's suppliers;
- Other persons, entities or organizations.

All Heads of Department of the organization involved in the ISMS are directly responsible for the implementation of the Information Security Policy in their areas of responsibility.

It is the responsibility of each FintechOS employee to adhere to this policy and any other applicable policies and procedures regarding the protection of FintechOS's information resources.

Failure to comply with this policy may lead to disciplinary action in accordance with the RIO, up to the termination of the employment contract and, in certain circumstances, civil or criminal sanctions.