

Information Security Management System (ISMS) Policy

LusoBank S.A.

Objective:

To protect LusoBank's information assets against all internal, external, deliberate, or accidental threats and ensure compliance with ISO/IEC 27001:2022 and national regulations (e.g., GDPR, Banco de Portugal guidelines).

Scope:

This policy applies to all systems, employees, contractors, and third parties that interact with information within the organization. It includes on-premise systems, cloud-hosted services, and banking infrastructure.

Key Principles:

- Information shall be protected against unauthorized access.
- Confidentiality of customer data must be maintained.
- Integrity of data and systems shall be assured.
- Regulatory compliance is mandatory.
- Incidents must be reported promptly and investigated.

Governance:

The ISMS Steering Committee, led by the CISO, will oversee the ongoing effectiveness of the program.

Approved by: Executive Management

Date: 2025-07-31