BALFIN GROUP INFORMATION SECURITY COMMITTEE CHARTER

Introduction

Protection of the information entrusted to BALFIN Group companies (the "*Company*") by our stakeholders, employees, third parties, and clients is important to the success of our organization. In an effort to design, implement, and manage an effective information security program, the BALFIN Group Information Security Committee is established.

Purpose

The Information Security Committee (the "*Committee*") exists to propose recommendations to BALFIN Group Management Board in regard to IS Strategy and initiatives that need to be undertaken by the Company. The Committee also coordinates and communicates the direction, current state, and oversight of the information security program.

Members

The Committee is comprised of BALFIN Group Chief Executive Officer (Chairperson), Chief Transformation Officer and an external consultant with acknowledged experience in managing enterprise cyber-security or a well-known authority in information security. All committee members are appointed by the BALFIN Group CEO with a mandate of 2 years, after which should be re-appointed

The Chairperson of the Committee shall report to the Group Management Board from time to time or whenever so requested by the Board members.

The Chief Information Officer and Information Security Officer reports to the IS committee on periodical basis.

Responsibilities

The responsibilities of the BALFIN Group Information Security Committee are:
- Inform the board's decisions through advice on corporate/ strategic information security regulation priorities, capacity, capabilities, and key projects.
- Oversee and advise the board on the current risk exposures of the company in respect of information security.
- Advise the board on best practice measures in similar corporate environments and industries, while factoring latest technological and cyber security global developments.
- Leads the efforts and emergency response in cases of major cyber security events, aligning the operational team activities and involving respective stakeholders.
- Formulate, review, and recommend information security policies and program
- Review the effectiveness of information security program implementation
- Provide clear direction and visible management support for information security initiatives
- Initiate plans and programs to maintain information security awareness
- Ensure that information security activities are executed in compliance with the respective policy

- Identify and recommend how to handle non-compliance with information security policy
- Approve methodologies and processes for information security implementation
- Identify significant threats and vulnerabilities of the information security framework
- Assess the adequacy and coordinate the implementation of information security controls
- Promote information security education, training, and awareness throughout BALFIN Group
- Evaluate information received from information security monitoring processes
- Review information security incident information and recommend follow-up actions
- Educate the team and staff on ongoing legal, regulatory, and compliance changes as well as industry news and trends
- Propose capital investments in improving the IS infrastructure to keep it up to date with latest technological developments

Meetings

The Committee will meet either in person or through electronic means (teleconference, video conference, etc.) on a regular quarterly basis. In addition to the regular meetings, the Committee shall hold special meetings as its members shall deem necessary or appropriate.

Additionally, the Committee may invite to its meetings any director, any member of the management of the Company, and such other persons as it deems appropriate to carry out its responsibilities.

Decision Making

All decisions and recommendations made by the Committee should be unanimous and documented by minutes of the meeting. If a unanimous decision or recommendation cannot be attained, the Chairpersons decision prevails.

Agenda

An agenda should be prepared for each Committee meeting. The agenda together will presentations/documents related to agenda items, should be communicated to all committee members 72 hours prior to the commencement of the meeting.

Attendance

In the event that a member cannot attend a meeting, the member should communicate his/her responses to the agenda items and/or send a delegate attendee with the authority to speak for the committee member.

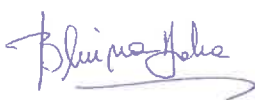**April 2022, approved by Group Management Board:**

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