

## **INFORMATION POLICY**

Approved by ISA Board of Directors, session 831

May 29, 2020

### **OBJECTIVE**

To declare the corporate decisions that conduct information and knowledge management as critical and strategic assets, for businesses development in their present and future requirements, which need to be preserved and protected in pursuit of sustainability, the construction of synergies and the operation continuity of ISA and its Companies.

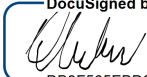
### **STATEMENTS**

- We establish mechanisms to safeguard information, complying with policies that apply to ISA and its Companies, and especially those that in their business line has hosted and third-party information services, with availability, integrity, confidentiality, transparency and reliability criteria.
- We rigorously handle confidential information from internal or third parties sources and especially that of our employees, ensuring compliance with Habeas Data and the protection of personal information of our stakeholders.
- We establish strategies and practices for knowledge management that allow capture, maintenance and transfer of knowledge and institutional memory.
- We recognize our employees intellectual property, creations and inventions and other assets related to information and knowledge, as they are part of the patrimonial rights and corporate property of ISA and its Companies.
- We abide by and respect intellectual and industrial property, information exchange laws in every country where we operate, as well as the relevant covenants, agreements and treaties and the voluntary commitments that ISA and its Companies have contracted.
- We identify cyber risks that can threaten our information security and we are committed to managing them, in compliance with current regulations, with requirements demanded by customers and market, training the employees of our Companies in this matter and implementing technological mechanisms and processes to mitigate them.
- We implement mechanisms to mitigate information leakage and control the way in which our users share it safely. To do this, we restrict access to file sharing websites and mass storage mailboxes other than those defined by our guidelines and we limit the use of removable media such as USB sticks or external drives.

- We assign usability and access privileges to information, according to profiles, roles and responsibilities.
- We promote the responsibility of our workers with the management of information and knowledge, ensuring compliance with defined criteria and continuous improvement.

## **ROLES AND RESPONSIBILITIES**

- All employees of the organization are responsible for the application of this policy in their scope of action in accordance with management guidelines, internal regulations and protocols defined for this purpose.
- Each ISA affiliated Company is fully responsible for assessing, classifying and determining the treatment of information, considering, among others, its characteristics of confidentiality, integrity and availability. Additionally, it must manage the risks associated with the protection of information and knowledge within the framework of the corporate model.

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**OLGA LUCÍA LÓPEZ MARÍN**

**CHIEF INFORMATION OFFICER**