

A low-angle, upward-looking photograph of a circular architectural structure. The structure consists of multiple concentric rings of fabric, with colors transitioning from light yellow at the top to deep red at the bottom. The rings are supported by a central vertical pole and radial spokes. Small, rectangular windows are visible between the rings, allowing natural light to filter through. The overall effect is a sense of depth and symmetry.

Information Security
Management System Policy

1. INTRODUCTION

For Castellana Properties, information is a highly valuable asset, which creates the need to implement measures that ensure the protection of its confidentiality, integrity, and availability.

To this end, Castellana Properties is committed to an information security management system implemented and certified under the ISO 27001 standard.

2. OBJECTIVE

Establish the minimum requirements and basic standards for information security management at Castellana Properties, with the aim of ensuring that all information systems supporting initiatives designed to promote employee well-being and work-life balance, deployed across all areas of the organization, operate securely—protecting the confidentiality, integrity, and availability of information, both proprietary and that of third parties.

The general objectives for the Information Security Management System are as follows:

1. Demonstrate Castellana Properties' commitment to information security
2. Reduce the risk of potential cyberattacks
3. Minimize the damage caused by potential incidents
4. Reduce the risk of theft or loss of sensitive information
5. Align the information security strategy with the organization's business objectives, strategy, and plans

The IT and Security Committee (hereinafter, the IT Committee) is the body responsible for defining the objectives. It is also responsible for updating them in the event of changes to the corporate strategy.

For each objective, the IT Committee, together with the relevant departments, defines a series of indicators to measure compliance. These indicators are approved by the IT Committee and recorded in the Information Security Indicators Register.

All indicators must be measured by their respective owners at least once a year.

Once the measurement process has been completed, the IT Committee carries out an analysis and evaluation of the objectives' compliance, which is then presented to the IT Committee.

3. SCOPE

This policy applies to all information infrastructures and assets, including the infrastructure provided by Castellana Properties, project-specific infrastructure, and client infrastructure under the responsibility of the organization's personnel. It must be adhered to by all employees, suppliers, visitors, and third parties who provide services to or maintain any type of relationship with Castellana Properties.

4. ROLES AND RESPONSABILITIES

To ensure the confidentiality, availability, and integrity of information, Castellana Properties has established a Security Committee whose responsibilities and members are defined in the Roles and Responsibilities document.

5. INFORMATION SECURITY PRINCIPLES

This Policy adheres to the recommendations and best practices for Information Security as outlined in the International Standard ISO/IEC 27001:2022, as well as to the applicable legislation on personal data protection and any regulations related to Information Security that may affect Castellana Properties.

The organization establishes the following fundamental principles as key guidelines for information security, which must always be observed:

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- Embed Information Security within the organization's culture and management. Information security must have the commitment and support of all management levels, ensuring it is coordinated and integrated with the organization's other strategic initiatives.
- Ensure the confidentiality, availability, and integrity of the organization's information in order to meet business objectives and fulfill contractual and legal obligations.
- Establish a clear and efficient information management methodology.
- Ensure secure and reliable access to information.
- Reduce the risk of malicious use of information.
- Require the establishment of measurable security objectives and criteria for their continual improvement.
- Control information security risks by identifying them, implementing controls for their mitigation, and establishing regular procedures for their reassessment.
- Ensure compliance with all applicable information management laws.
- Raise awareness within the organization about the importance of information security.

The Management of Castellana Properties, aware of the importance of information security for the successful achievement of its business objectives, commits to:

- Promote information security roles and responsibilities throughout the organization.
- Provide the necessary resources to achieve information security objectives.
- Encourage the dissemination and awareness of the Information Security Policy among employees.
- Enforce compliance with this Policy and with the applicable legislation in the field of information security.
- Consider information security risks in decision-making processes.

Since Information Security is the responsibility of all Castellana Properties personnel, this Policy must be known, understood, and adopted by all employees.

CEO – Alfonso Brunet