Information Security Policy – Public Version

Global Information Security

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Version 2.0

Document Type: PUBLIC

About this document

This is a simplified public version of SAMY's internal Information Security Policy (the "Information Security Policy"), prepared for public purposes. It summarizes the basics of SAMY's information security approach and may be shared with clients, partners and other interested parties. The Information Security Policy, approved by SAMY's Management and signed by the Chief Executive Officer on 20 October 2026, is the governing document of SAMY's information security framework and is not published.

Versions of the document

Version	Date	Author	Description
1.0	2025/10/01	Cybersecurity & GRC Management	Policy Definition and Review
2.0	2026/10/14	Information Security	Simplified public version of the Information Security Policy v2.0

Distribution of the document

Version	Recipient	Organization
2.0	Public (website, clients, partners)	SAMY ROAD S.L.

1. Purpose and commitment

This document is a simplified public version of SAMY's Information Security Policy, the highest-level normative document governing information security at SAMY ROAD, S.L. It is published for public purposes and summarizes the principles and commitments set out in the Information Security Policy, which remains the governing document and is approved by Management.

SAMY ROAD, S.L. (SAMY) is committed to protecting the information entrusted to us by clients, employees, creators, partners and other stakeholders. Information security is integral to maintaining trust, supporting business continuity and delivering our services responsibly. In line with its Information Security Policy, SAMY maintains an Information Security Management System (ISMS) aligned with ISO/IEC 27001:2022 principles and is committed to its ongoing improvement.

2. Scope

As in the Information Security Policy, this public version covers SAMY's overarching information security commitments across its business activities and group operations. It applies to personnel and relevant third parties who access or handle information on SAMY's behalf, subject to applicable contractual arrangements and local requirements.

3. Information security principles

In line with the Information Security Policy, SAMY seeks to preserve the confidentiality, integrity and availability of information; ensure that access is authorized and proportionate to business needs; promote accountability in information handling; and apply security measures appropriate to the risks associated with information, systems and services.

4. Our security commitments

Under its Information Security Policy, SAMY commits to identifying, assessing and treating information security risks; protecting personal, confidential and commercially sensitive information; maintaining appropriate organizational and technical safeguards; promoting employee awareness and responsible use of technology; considering security throughout the lifecycle of services and projects; applying security, risk assessment and governance controls to the use of artificial intelligence, including AI agents, in line with its internal policies; and assessing security requirements relevant to suppliers and partners.

5. Incident response and resilience

In line with the Information Security Policy, SAMY maintains processes to identify, report, assess, respond to and recover from information security incidents. We seek to minimize disruption, protect affected stakeholders and strengthen our security practices through lessons learned. Business continuity and recovery measures are considered in proportion to operational needs and risk.

6. Privacy and regulatory compliance

SAMY is committed to meeting applicable data protection, privacy, information security and contractual obligations in the jurisdictions in which it operates, as set out in its Information Security Policy. Personal data is handled in accordance with applicable requirements and SAMY's relevant privacy notices and internal policies.

7. Governance and continuous improvement

Under the governance model defined in the Information Security Policy, SAMY management supports the ISMS through defined accountability, appropriate oversight and the allocation of resources. Information security objectives, risks and safeguards are reviewed periodically and adapted to changes in business operations, technology and the threat landscape.

8. Policy availability and review

This document is a simplified public version of SAMY's Information Security Policy and does not replace it. Detailed internal policies, procedures and security configurations are maintained separately and are not disclosed in this document. The Information Security Policy is reviewed at least annually, and whenever there are material changes in the technological, organizational or regulatory environment, and is re-approved by Management; this public version is reviewed and updated together with it.