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SALTO Systems

Business Continuity Policy

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1 I Introduction

The Management of the group of companies of which Salto Systems S.L. is the parent company (the “Salto Group”) is committed to preserve the continuity of business processes and services in the face of disruptive incidents to preserve its competitive edge, legal and contractual compliance, and commercial image.

The general objective of the Business Continuity Policy is to prepare Salto Systems to cope with the effects of an incident, establishing a sufficient set of procedures to respond adequately to an incident, from the moment a disaster is declared until the return to normality, in such way that its impact on business is kept to a minimum.

The policy provides a framework to identify, develop, implement, operate, check and maintain the measures and procedures through a Business Continuity Management System (BCMS) aligned with business requirements and international standards.

1.1 Scope

The scope includes:

- The Business Continuity Policy and the BCMS applies to all employees, in particular individuals that have specific responsibilities in the BCMS (details below)
- Infrastructure, systems, facilities and other resources involved in the business processes.

1.2 Disruptive Incident or Disaster Concept

A disruptive incident is an event that, unlike a conventional incident, unpredictable / high level of uncertainly, that disrupts the core activities and requires urgent actions. Requires a flexible, creative & strategic level response.

Incidents can be of different types, being more common: Natural like floods or fires; Human type like epidemics or serious illnesses, accidents at work; or being Technical incidents (i.e. power failures, system, communication failures or malware, …).

1.3 Regulatory Framework

Salto Systems has regulatory requirements concerning business Continuity and resiliency, especially in relation to the services provided to clients.

Likewise, the international standard ISO 22301 defines the best practices regarding how an appropriate Business Continuity Management System should be established in an organization. The requirements established in this Policy are based on ISO 22301 standard.

2 I Business Continuity Goals

Salto Systems should pursue the following main objectives in terms of business continuity

- Restore to an acceptable level the critical business processes that have been interrupted within a certain time limit that guarantees a minimum impact on the business at a reasonable cost for Salto Systems and its clients.
- Protect the company brand in the media and social networks in the event of disaster situations, during and after the periods of impact.
- Ensure regulatory compliance in terms of continuity.
- Protect the image of the company as a provider of services or products to clients and third parties.

3 I Business Continuity Management Model

To fulfill the objectives and guidelines of this Policy, a Business Continuity Management Model is implemented composed by the following elements:

- **Understanding of Organization**: Identify and take into consideration the organization’s Business objectives, concerned parties and applicable legal obligations.
- **Roles and responsibilities in Business Continuity Management:** Formally establish roles and responsibilities related with key processes within the Business Continuity Management Model in the company.
- **Impact Analysis:** Identify the activities, services and resources required in Business processes, as well as their criticality. Establish prioritization criteria for their recovery within the RTO.
- **Performing and managing Risk Analysis:** Risks related with the resources (IT/People/Facilities/Suppliers) are identified and managed by aligning mitigation strategies with agreed continuity strategies.
- **Business Continuity Strategies:** Its development and implementation must be aligned with the company’s Business Continuity objectives. The strategies must:

    o Consider the results of the identification and evaluation of risks, as well as mitigate them to an acceptable level if required.
    o Provide coverage to people, facilities, technology, information, suppliers and interested parties.
    o Consider regulatory, legal or contractual obligations related to the availability of business processes.
    o Provide methods to restore the capacity of critical resource provision.

- **Incident response and continuity plans:** Build response plans and procedures that are necessary to ensure the continuity of business operations and the proper management of a disruptive incident.
- **Maintenance, review and testing:** The Business Continuity Management model must be subject to a review and periodic testing process with the following assumption:

    o Documentation associated to the BCP is kept up to date (detailed in section 5), in accordance with this Policy, carrying out the corresponding periodic reviews.
    o Ensure the maintenance of Business Impact Analysis (BIAs) of each department.
    o Perform periodic continuity tests to review the effectiveness of the plans, ensuring compliance with business requirements (Recovery Time Objective – RTO y Recovery Point Objective - RPO).

- **Training and awareness:** Ensure that all individuals with roles and responsibilities in business continuity is aware or their responsibilities within the BCP by means of periodic training and verification of their BCP.

4 I Responsabilities

The most relevant functions and responsibilities in the business continuity management of the organization are detailed below.

4.1 Business Continuity Responsible

The Business Continuity Responsible will oversee the deployment at a tactical level of the organization’s business continuity management program and liaise between the owners of critical processes and the Security Committee. The main responsibilities are:

- Development and maintenance of this policy and ensure t it is communicated to all people who work in the organization.
- Elaborate, keep updated, approve and distribute the

documentation related with the business continuity management program (manuals, methodologies, guides, etc., detailed in section 5).

- Ensure that process owners maintain the BCP up to date, Business Impact Analysis questionnaires (BIAs), specific Business Continuity Plans, etc.).
- Manage the risks related to continuity
- Agree the criteria for the organization in relation to the criticality of the business processes and resources, detailed in the BIA Methodology.
- Ensure that all critical processes of the organization and resources that support them (technology, work centers, people, suppliers, third parties, etc.) are identified and have continuity mechanisms aligned with business requirements and business continuity strategies.
- Support audits or third parties' reviews in terms of business continuity,
- Ensure responsible monitor and resolve all the continuity risks and improvements identified (in documentation review, impact analysis, risk analysis, tests, etc.).
- Ensure that all personnel with relevant responsibilities in the context of business continuity management are aware of their responsibility involving them in their BCPs reviews or by means of periodic training.
- Ensure that the organization has a incident response structure for disruptive incidents (disasters or potential disasters), which is composed by representatives with the necessary experience and authority to deal with any situation of this nature. The responsibilities related with the incident response structure are reflected in the Crisis Management Procedure, which is part of the business continuity program (section 5).

4.2 Critical Processes Responsible

In order to ensure that each critical process has appropriate continuity plan, the owner of the critical process must:

- Provide the information requested by the Business Continuity Responsible, in order to review / validate the implementation of the required measures.
- Update and maintain the information contained in the Business Impact Analysis (BIA) and Business Continuity Plans (BCPs) under their responsibility regularly.
- Collaborate in the different tests or evaluations required by the Business Continuity Responsible. Define those aspects that must be validated from the business perspective during the tests (IT, relocation tests, etc.)., check it is working as expected, and report the results and improvements identified.
- Ensure the improvements under its responsibility are implemented.
- Escalate to the Business Continuity Responsible any continuity risk identified by them (when updating BIAs, etc.).

In Salto Systems, in general, the person in charge of the critical process will be the person in charge of the business area to which the process is related.

4.3 Critical Resources Responsible

The resources are basically classified into four types: Technology (IT Applications), Facilities / Work Centers, People and Suppliers or Third parties.

Regardless of the type of resource, the responsible of a critical resource has the responsibility for the operational deployment of the measures (prevention / safeguard mechanisms) that are required by the Business Continuity Responsible to provide enough level of availability (RTO) to the critical resource under its responsibility.

In order to assess the suitability of the required measures, the person in charge of the critical resource must:

- Provide the information requested by the Business Continuity Responsible to review / validate the implementation of the required measures.
- Facilitate the performance of the tests that are required by the Business Continuity Responsible.
- Carry out the monitoring and implementation of the improvements that arise as a result of the tests.

For resources such as people or suppliers, the responsible for critical resources will be responsible for the critical process with which they are related. Also, for those responsible for IT applications will be the IT Responsible related with each one.

4.4 Security Committee

The functions and responsibilities of the Security Committee are mainly related with the review of continuity risks, related mitigation plans and approval of policies and strategies, detailed in Security Committee Terms of Reference. Their functions are also related with the incident response and are defined in the Crisis Management Procedure.

5 I Manuals, Guides and Methodologies

Salto Systems has the following guides or methodology that develop the requirements of this policy in relation to the Business Continuity Management model:

- **Scenarios and Strategies:** High-level approach of the strategies and actions planned to face the main threats to which the organization's business operations are subject.
- **Business Impact Analysis Methodology:** Describes the methodology for conducting the Business Impact Analysis (BIA) across Salto.
- **Business Continuity Plan Methodology:** It describes the methodology for building Continuity Plans specific to each business area.
- **Crisis Management Procedure.** It establishes a reference guideline for management and incident response in the event of a disruptive event.
- **Continuity Testing Design Guide:** It establishes the objectives and the different types of tests to be carried out in the field of Business Continuity.
- **Business Continuity Management System:** Details the Policy guidelines related to the Business Continuity Management System implemented in the organization, and describes the main processes, functions and responsibilities related with it.

6 I Document Governance

6.1 Approval, Validity and Policy Update

This Policy is effective from the date of its approval by the Security Committee. It should be reviewed regularly year or when significant changes occur in the organization.

6.2 Distribution

This policy will be distributed to all employees to ensure commitment of all members of Salto Systems.