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IT Policy

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1. Purpose

The purpose of this IT policy is to ensure that IT governance is carried out cost-effectively, contributes to efficient processes and contributes to all units in the Group being able to achieve their business goals and that values of openness, integrity and trust are supported.

The IT policy shall ensure that:

- Effective IT governance is based on the needs of the business, is established and managed.
- IT governance is carried out in accordance with the decided IT strategy.
- We comply with applicable laws and regulations.
- We have an Information and IT security that lives up to the requirements set by authorities, clients, employees and customers.

2. Scope

This policy applies to all operations and employees or temporary staff within Balco Group.

In part-owned businesses, representatives of Balco Group shall work to ensure compliance with this policy. Acquired companies have two years to live up to the Group's IT policy.

Exceptions or exemptions from this policy must be clearly defined and documented. All applications for exemptions must be submitted to the IT Manager, who, in consultation with the Group's CEO, is responsible for approval. Exemptions or requests for derogations shall be accompanied by a plan for when compliance has been achieved again.

3. Content of the policy

IT at Balco Group will support the business by creating the conditions for achieving the long-term business goals. The IT policy shall constitute overall guidelines for how IT shall be managed, operated and delivered within Balco Group.

3.1 IT strategy

IT within Balco Group shall be governed by the adopted IT strategy where the overall requirements for IT are described, how IT operations are managed based on business requirements and how IT services are provided.

3.2 IT governance

- Strategic IT decisions shall be made by the Group CEO with the support of Group Management.
- Operational decisions regarding IT operations shall be made by the IT Council.

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- Minor operational decisions regarding IT operations are to be made by the IT manager.
- There must be a defined IT architecture, which describes the rules for how the IT environment and IT infrastructure are to be built. They form the basis for the development and management of Balco's IT solutions.
- There must be a description of Balco's IT systems and infrastructure.
- There must be clearly documented roles with responsibility for the systems that have been classified as mission-critical.
- There must be a documented process for change management regarding applications, systems and IT infrastructure.
- IT operations must be documented and continuously kept updated to reduce dependence on key personnel.

3.3 IT delivery

- IT must document its main processes and work in accordance with accepted good practice.
- There must be a Business Continuity Plan (BCP) based on the business's highest priority risks and an associated disaster recovery plan for how IT supports the business's return to normal (DRP – Disaster Recovery Plan).
- Purchases of IT-related services, hardware or software shall be handled by the IT department in a cost-effective manner for the Group.
- The development and procurement of IT-related services and resources must be documented in such a way that the scope, how it will support the business and who has made the decision is clearly stated.
- The IT department shall ensure that all license terms for software or IT services are complied with and that the group is neither over- nor under-licensed.
- Coordination of agreements with IT suppliers will be established and agreed quality levels (SLAs) and delivery capacity will be followed up continuously.
- IT services must be provided and adapted to the requirements and needs of the business.
- There shall be documented rules for the acceptable use of Balco Group's IT-related services and resources.

3.4 IT services, resources and infrastructure

- All employees must certify that they have read and understood the rules that exist for the management of IT-related services and resources, including mobile telephony.
- Every user is obliged to follow the rules that exist.

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- Each head of department shall be responsible for communicating the guidelines and ensuring the certification.

4. Roles and responsibilities

The Board of Directors has established this policy.

The CEO of Balco Group AB appoints the Group's IT manager.

The Group's IT manager is responsible for administering and annually revising this policy and ensuring that it supports the adopted IT strategy.

The managing director of each company is ultimately responsible for ensuring that it is applied in their own company, including defining responsibilities and roles.

5. Compliance criteria

In order for this IT policy to be considered complied with, the following criteria must be met:

- The policy must be approved by the board
- The policy must be communicated and anchored in the management team
- The policy shall be readily available to all staff concerned
- The policy shall be revised annually and updated as necessary

6. Other documents

- Information security policy
- Guidelines for the acceptable use of Balco's IT Resources