

# Information Security Policy

In Tschudi we promote information and communication technology as a key enabler for value creation, for innovation of products and services, for digitalization and automation of business processes, for communication, for protection of data and information and for preservation of company legacy and history. Our adoption into the Microsoft cloud provides a standardized platform and framework for information security, ICT management and investments in general across the Tschudi Group.

Our people are our most valuable and trusted resource, and everyone should understand their duties and responsibilities when it comes to cyber security. We provide training on our digital solutions and systems aiming for effective utilization and data protection. We recognize our people as a key target for cybercrime, and regularly arrange cyber security awareness activities aiming to grow a culture of cyber security awareness.

Our information security management system is an integral part of the Tschudi Management System (TMS) and is based on the ISO 27001 (Information Security Management) standards. It covers governance and risk management, policies, processes and procedures, management of third parties and aim to increase security awareness and the resilience of our organization as well as ensuring quality of services and compliance with relevant statutory and regulatory requirements.

Our strategy for data and information protection maintains a high level of information security ensuring the confidentiality, integrity, and availability of information covering data from multiple sources, such as information technology (IT), operational technology (OT), personal data and operational data.

In practice this means that data and information are only available to authorized parties, and confidential data is not disclosed to people who do not require them or who should not have access to them. The integrity of data refers to the certainty that the data is not tampered with or degraded during or after submission and has not been subject to unauthorized modification, either intentional or unintentional. The information is available to authorized users when it is needed and the cloud platform provides properly functioning computing systems, security controls and communication channels.

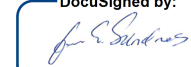
We aim for simplification, reliability, and efficiency, within a controlled and secured environment for communication and information treatment, aiming for protection of our people and businesses as well as our customers and business partners.

DocuSigned by:  
  
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Felix H. Tschudi

Chairman

Lysaker, May 25, 2022

DocuSigned by:  
  
A70549BD8247460

Jon Edvard Sundnes

CEO

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	cml@tschudishipping.no
	IP Address: 10.111.40.202

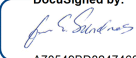
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
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**Electronic Record and Signature Disclosure:**  
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In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	5/24/2022 5:04:42 PM

<b>Envelope Summary Events</b>	<b>Status</b>	<b>Timestamps</b>
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Signing Complete	Security Checked	6/2/2022 3:46:32 PM
Completed	Security Checked	6/2/2022 3:46:32 PM

<b>Payment Events</b>	<b>Status</b>	<b>Timestamps</b>
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**Electronic Record and Signature Disclosure**

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You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically as follows:

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