

1. INFORMATION SECURITY POLICY

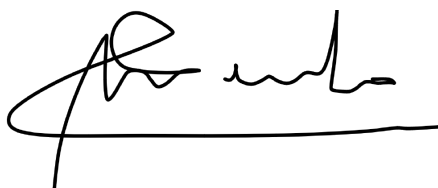
In a technological environment where the convergence between computing and communications is enabling a new productivity paradigm for companies, it is very important that the users of a corporate information system have a guide of good practices to achieve the objectives of confidentiality, integrity, availability, and legality of all the information managed.

- **Confidentiality:** The information processed by **HEYTRADE** will be disclosed only to authorized persons, after identification, at the time and by the means provided.
- **Integrity:** The information processed by **HEYTRADE** shall be complete, accurate and valid.
- **Availability:** The information processed by **HEYTRADE** will be accessible and used only by authorized and identified users, guaranteeing its availability in any eventuality.
- **Legality:** **HEYTRADE** will guarantee compliance with all applicable legislation. In particular, the regulations in force relating to the processing of personal data.

HEYTRADE's General Management is responsible for supporting and promoting the establishment of the organizational, technical and control measures necessary to comply with the security guidelines described herein. Consequently, **HEYTRADE** has defined a set of internal rules that all users of the information system must comply with.

This Security Policy will be maintained, updated, and adapted to the organization's goals, in alignment with the organization's framework for strategic risk management. To this end, it shall be reviewed at planned intervals or whenever significant changes occur, in order to ensure that its suitability, adequacy and effectiveness are maintained. A formally defined risk assessment procedure is also defined to manage the risks faced by **HEYTRADE**.

Madrid, March 15, 2022

A handwritten signature in black ink, consisting of a large, stylized initial 'R' followed by a series of loops and a long horizontal stroke at the bottom.

Ramiro Martínez-Pardo Suardiaz