



Cyber Security Policy



GTM Grupo, commits to set the criteria, processes and guidelines to ensure the confidentiality, integrity and availability of the information and the associated systems, in accordance with the business needs, requirements and strategies, keeping a balance between the resources available to this avail and the acceptable levels of risk.

Likewise GTM Grupo commits to ensure the protection against damages caused by digital attacks against confidentiality, integrity, availability, authenticity, reliability of the information and assets in the cyberspace, including and not limiting the organisation, the collection of resources, processes and structures, to guarantee end-to-end security in all the supply chain.

The Cyber Security policy is based on the following basic principles:

- **Guaranteeing** that the information systems (IT) of GTM Grupo have an **adequate level of security and resilience** and the most advanced standards are applied in the technological assets that back the operation of critical infrastructures based on our customers' requirements.
- **Implementing** the necessary **security measures** to protect the confidentiality, integrity and availability of the information and the operation systems depending on their criticality and existing risks, following an approach based on our customers' risk and requirements.
- **Encouraging** the implementation of adequate **security mechanisms** and resilience for the systems and operations managed by third parties providing services to GTM Grupo.
- **Raising awareness** among the employees and third parties GTM Grupo have a relationship with on Cyber Security risks and guaranteeing they have the knowledge, skills, experience and technological capacities required to support GTM Grupo's objectives.
- **Encouraging** the capacities for **prevention, detection, reaction**, analysis, recovery, response, investigation and coordination against cybercrime incidents and activities.
- **Providing procedures and tools** to adapt swiftly to the changing conditions of the technological environment and the new threats.
- **Guaranteeing** the **regulatory compliance** associated to the Cyber Security areas throughout GTM Grupo.
- **Collaborating** with relevant organisations, government agencies and associations to contribute to a **global improvement of Cyber security**.

Aiming at meeting the objectives and principles of this policy, GTM Grupo will implement a Cyber Security Governance Model based on an appropriate definition and allocation of governance roles and responsibilities, management and operation; and it will develop the procedures, rules, methods and tools required, that will be ruled by the following work flow chart:

- a) **Identifying** the risks by implementing structures and processes to keep and develop security capabilities pursuing the following objectives:
 - i. Encouraging the Cyber Security organisation with an overall view of GTM Grupo, based on the continuous identification of risks and reducing the level of exposure, ensuring the compliance to the commitments at all the business Group levels.
 - ii. Standardising and keeping a Cyber Security governance model based on supervised risk, standards and controls which optimise the investment of resources.

- b) **Protecting against the threats** by improving the protection measures of the digital assets before they become a risk and by developing the security technologies applicable to the protection of the assets bearing in mind their life-cycle, criticality and threat development.
- c) **Detecting** threats by using multiple sources to manage them in a proactive way and increasing the internal or external threat detection capabilities with advanced technologies and processes.
- d) **Responding** to the Cyber Security incidents ensuring the continuity of the services supported by the assets which form part of the technological and digital infrastructure of GTM Grupo and reducing the impact of the incidents through the definition of the corresponding procedures.
- e) **Recovering** and restoring any capability or service affected by a Cyber Security event.

GTM's Cyber Security is based on the care taken by all their collaborators in their daily tasks and from their area of responsibility.

