

# IT POLICY

This Group-wide policy has been prepared by Balder's IT Department, IT Manager, in collaboration with HR. The Group-wide policy provides guidance for all of Balder's subsidiaries, although local deviations may occur. The policy has been adopted by the company's Board of Directors and will be reviewed annually.

## 1. PURPOSE

This policy provides guidelines and requirements regarding IT security and the handling of hardware and information-related resources within the Fastighets AB Balder Group (Balder). The main purpose of this policy is to protect the integrity surrounding information handled every day within Fastighets AB Balder. The policy applies to all employees, business partners and other parties that come into contact in any form with Balder's IT systems.

The term "IT" includes both hardware and software used to produce, store, search for, disseminate and communicate information internally and externally at Balder.

IT security is extremely important for all parts of the company and affects not only employees, but also customers, suppliers and business partners. It is therefore extremely important that all employees and business partners are familiar with and observe the policies, guidelines and procedures that have been established.

## 2. SECURITY

Work on IT security aims to protect Balder's operations, employees, customers and financial interests, and to ensure that the business can continue unhindered. Balder's work on IT security is based on different levels of protection in order to increase the company's resilience and spread of risk. This involves measures such as multi-factor authentication when accessing information, regular internal vulnerability analyses, external security audits of the company's infrastructure and system configuration, and disaster and action plans for Balder's central systems. Balder also has operational measures in place to monitor and respond to data breaches and cyber-attacks.

## 3. RESPONSIBILITIES

All employees are responsible for ensuring that handling of Balder's hardware and information takes place in a correct, secure manner. This applies regardless of whether it involves documents and information in property and customer systems or what is written on websites and social media channels. All employees within Balder shall work actively to ensure that confirmed guidelines and adopted goals relating to work on information security are achieved and that security awareness is there at all times.

All information held in storage areas that are in some way controlled by the company or a supplier to the company is the company's property. Employees who have been given permission to use the company's or another party's material must respect the rules that are regulated in

GDPR, as well as copyright-protected material and/or confidential information. Nor is it permitted to modify or convey material created by another party without their knowledge and/or consent. Each employee is responsible for their accounts and these must not be made available to others. Passwords are personal and may not be passed on. Passwords shall follow Microsoft's recommendations as far as possible.

Under no circumstances is it permitted to save, download or disseminate material or files that are in breach of the Swedish Copyright Act. Nor is it permitted to acquire, save or distribute unlicensed or in any other way illegal software. It is not permitted to use the internet to view, listen to or disseminate material that is discriminatory, pornographic, political, has criminal links or is in any other way in breach of Balder's policies and rules.

Employees shall always treat Balder's IT equipment with care and attention.

#### **4. INTERNET**

Information is sent every day via the internet and is usually traceable. It is important that you are aware of this, as you represent Balder and are responsible for presenting a correct, positive image of the company. Use of the internet shall therefore take place within the framework of the laws and rules that exist in society and within the company.

The internet shall be used in a professional way that benefits the company. Any use for private purposes may not encroach upon daily work, but should wait until the lunch break or outside work. Under no circumstances is it permitted to save, download or disseminate material or files that are in breach of the Swedish Copyright Act. Nor is it permitted to acquire, save or distribute unlicensed or in any other way illegal software. It is not permitted to use the internet to view, listen to or disseminate material that is discriminatory, pornographic, political, has criminal links or is in any other way in breach of Balder's policies and rules.

Gothenburg, 9 February 2024

Board of Directors of Fastighets AB Balder