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Policies of

Babylon Cloud

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PUBLIC USE

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1 VERSION HISTORY

Version	Date	Changes
1	01/04/2020	First version
2	23/12/2021	Second version: registered office, additions to the Purpose and Principles sections and Section 4.4
3	09/09/2022	Addition to Section 6; textual corrections.
4	12/06/2023	Two new certifications added to Chapter 2 and one item added to Section 4.3
5	11/01/2024	Additions to Sections 2 and 4.4.
6	15/01/2025	Added elements to align with ISO 50001 and ISO 14001; defined specific policies for energy use and environmental protection
7	22/06/2025	Clarified application of security and privacy standards in countries where GDPR does not apply (Sections 5.1 and 5.2)
8	15/01/2026	Updated in light of the new certifications
9	12/10/2026	Updated the methods for communicating and making the Policy available

2 PURPOSE

The Management of Babylon Cloud, following its decision to establish an Integrated Management System (IMS), defines these Babylon Cloud Policies.

To ensure the highest level of products/services and the greatest possible reliability, Babylon Cloud has decided to operate in compliance with the requirements of the following management systems:

- UNI EN ISO 9001:2015 – Quality management systems – Requirements (hereinafter QMS)
- UNI CEI EN ISO/IEC 27001:2017 – Security techniques. Information security management systems – Requirements (hereinafter ISMS)

In addition, Babylon Cloud aims to provide its customers with services and products with the utmost respect for environmental sustainability and has obtained the following certifications:

- UNI EN ISO 14001:2015 – Environmental management systems – Requirements with guidance for use (EMS)
- UNI CEI EN ISO 50001:2018 – Energy management systems – Requirements with guidance for use (EnMS)

with the aim of demonstrating its commitment both to environmental protection (EMS) and to energy management (EnMS).

As a result of these strategic decisions, Babylon Cloud:

- establishes, implements, operates, monitors, reviews, maintains and continuously improves its Integrated Management System (IMS), comprising the QMS, ISMS, EMS and EnMS;
- has adopted a system for assessing and treating risks and opportunities suited to its needs (ref. UNI ISO 31000:2018 – Risk management – Guidelines), specifically to preserve confidentiality, integrity and availability within the ISMS and, for the EMS and EnMS, to manage its energy sources and environmental impact responsibly;

- demonstrates its ability to consistently provide products and services that meet customer requirements and, where applicable, legal and regulatory requirements;
- pursues customer satisfaction through the effective application of the IMS;
- allocates adequate resources to achieve its planned objectives;
- in accordance with its EMS, provides its services and develops products under conditions that best support environmental protection and Green Cloud principles;
- in accordance with its EnMS, provides its services and develops products under conditions that best support energy efficiency.

These Policies are approved, reviewed and updated periodically, and their contents are communicated to all relevant internal and external interested parties. The Policies are disseminated through publication on the institutional website www.babyloncloud.com, where they are accessible to company personnel and external interested parties. www.babyloncloud.com

3 PRINCIPLES

The principles of the Babylon Cloud IMS are:

- Customer focus: Babylon Cloud depends on its customers and therefore seeks to meet their present and future needs, fulfil their requirements and exceed their expectations. The commercial strategy of Babylon Cloud is aimed at minimizing customer churn and maximizing customer lifetime value. To achieve these objectives, Babylon Cloud considers it essential to meet customers' needs in terms of information, training and support, and to resolve any problems they report as effectively and promptly as possible.
- People involvement: Babylon Cloud recognizes that people at all levels are the essence of the organization and that their full involvement enables their capabilities to be used for the benefit of the organization. People involvement is pursued through the explicit sharing of high-level objectives and the development of a corporate culture based on common principles. Alignment of objectives is further encouraged through a stock option policy covering all permanent employees.
- Process approach: Babylon Cloud promotes a process approach to achieve desired results more efficiently. Its strategy involves defining clear and structured processes, with continuous improvement supported by information systems. Information systems are used to minimize repetitive activities and reduce errors, enabling people to focus on higher-value tasks and supporting them in their performance.
- Resilience: Babylon Cloud pursues a policy of safeguarding customer data and services, with the aim of ensuring data integrity, internal and external confidentiality, and data availability. To this end, Babylon Cloud continuously improves system resilience in terms of availability, redundancy of all system components, and vertical integration of infrastructure components, progressively building a unified system capable of ensuring the physical and logical security of each component;
- Continual improvement: Continual improvement of processes and overall performance is a permanent objective of Babylon Cloud. Process improvement aims to increase control while maintaining efficiency and to increase speed while maintaining control and

effectiveness. Babylon Cloud understands that process quality and performance are reflected not in outward measures but in their long-term impact on customers. Key measurements are linked to end results concerning customers and their satisfaction and, ultimately, to churn reduction, which remains the fundamental objective.

- Evidence-based decision-making: Babylon Cloud bases its decisions on the analysis of data and information. Activity tracking and the measurement and verification of events and outcomes are ongoing activities needed to inform effective corrective action for continual improvement of operations and operational processes.
- Mutually beneficial supplier relationships: Babylon Cloud and its suppliers are interdependent, and mutually beneficial relationships enhance the ability of both parties to create value. Babylon Cloud aims to build a single extended team, including collaborators and suppliers, underpinned by mutual trust and shared principles and working methods.
- Energy and environmental sustainability: Babylon Cloud is committed to being a provider of cloud products/services that continually improves its energy performance, both by minimizing consumption through targeted optimization policies and through offsetting and generation from renewable sources. Babylon Cloud is committed to improving its Green Cloud profile. In adopting this principle, Babylon Cloud recognizes the structural increase in global temperatures and that energy and environmental sustainability is not a private choice, but a long-term existential necessity.

4 OBJECTIVES AND STANDARDS – MANAGEMENT COMMITMENT

Management has decided to ensure and support the IMS in accordance with UNI EN ISO 9001:2015, UNI CEI EN ISO/IEC 27001:2022, UNI EN ISO 14001:2015 and UNI CEI EN ISO 50001:2018 and, for this purpose, establishes the following objectives.

4.1 General Policy

Management establishes the following objectives for all its management systems:

- ensure that the policy is appropriate to the purpose of the organization;
- ensure leadership and accountability for its management systems;
- ensure compliance with all applicable mandatory international standards and legal requirements;
- continually increase customer satisfaction, focusing on both explicit requirements, namely those expressly stated in supply agreements, and implicit requirements;
- maintain certifications by improving the IMS, including through internal projects to optimize existing processes;
- increase revenue and margins by increasing the number of managed volumes and projects, pursuing these objectives in an economically and financially sustainable manner;
- establish relationships of cooperation and trust with suppliers to achieve the common objective of delivering products and services that meet customer needs;
- increase staff competence, involvement and awareness, thereby also optimizing the use of human resources.

4.2 Quality Policy – QMS

Management establishes the following objectives for its QMS:

- maintain a focus on customers and interested parties in order to understand customer needs and plan activities to meet them fully;
- promote a process approach by identifying the organization's different activities as processes to be planned, controlled and continually improved, and by making the best use of resources for their implementation;

- increase the level of involvement of personnel and stakeholders;
- improve internal efficiency;
- apply risk-based thinking (RBT) to assess and minimize the risks of technical and commercial failures;
- promote the development of internal professional skills and the careful selection of external partners in order to secure competent and motivated human resources.

4.3 Information Security Policy – ISMS

Management establishes the following objectives for its ISMS:

- support management and all personnel in achieving the knowledge, awareness and skills needed to minimize the risk of potential damage arising from adverse information security events;
- ensure and protect information and services relating to the Group's business, including all customer and internal personnel information, safeguarding confidentiality, integrity and availability;
- establish and implement security measures to protect information within the scope against abuse, fraud, misuse and theft;
- integrate secure systems engineering principles into its application development processes;
- ensure a management process aligned with the European GDPR requirements governing personal data and the protection of cloud services.

4.4 Policy for Continual Improvement of Environmental and Energy Performance – EMS and EnMS

Management establishes the following objectives as part of its environmental policy decisions:

- all Company activities are carried out in full compliance with applicable legislation on environmental protection and occupational health and safety;
- Babylon Cloud pursues sustainability by designing its services, the technology it develops, its processes and work environments so as to maximize reductions in energy consumption for a given level of requirements and, wherever possible, to reduce those requirements;

- environmental protection, prevention of all forms of pollution, and health and safety in the conduct of Company activities are priority and ongoing commitments for Babylon Cloud;
- through the training it provides, Babylon Cloud enables employees to perform their duties in accordance with energy efficiency and environmental protection requirements. It also promotes operations focused on appropriate use of energy resources, proper waste management and respect for the environment;
- beyond legal obligations, Babylon Cloud pursues the long-term objective of progressively reducing its carbon footprint and improving energy management through successive stages:
 - purchasing electricity from specialized suppliers or obtaining co-location services in data centers powered exclusively by renewable energy;
 - cogeneration of renewable energy;
 - generation of renewable energy at owned sites, with the ultimate aim of becoming a fully self-sufficient zero-impact energy provider (eliminating electricity drawn from the grid and meeting 100% of demand through in-house generation).

5 PERSONAL DATA PROTECTION POLICY

5.1 General Principles

Babylon Cloud embraces the principle of safeguarding its users' privacy and has made it a fundamental principle of its activities, which it intends to defend at all costs, not merely to comply with regulatory obligations but out of the deep conviction of its Founders and Management team. Babylon Cloud recognizes its users as citizens and rights holders whose ability to exercise those rights defines their freedom. Babylon Cloud is aware that managing users' data is inseparable from protecting the freedom of individuals and citizens.

When operating in countries whose governments abuse or restrict individual rights, or which are under the influence of foreign governments that abuse or restrict such rights, Babylon Cloud undertakes to use all technological, managerial and legal means at its disposal to prevent or limit misuse of its users' information by third parties, including governments. Babylon Cloud also reserves the right to allocate technological support and/or part of the profits generated by operations in countries whose governments abuse or restrict individual rights to non-governmental organizations that actively support people whose rights are restricted or unrecognized.

5.2 Application of Principles to National Jurisdictions

Through its Personal Data Protection Policy, Babylon Cloud intends to protect the information and personal data handled in the course of its activities against all internal or external threats, whether intentional or accidental, in accordance with the provisions of the GDPR – EU Regulation No. 679 of 27 April 2016.

In Europe, the GDPR applies as law in all jurisdictions. In Italy in particular, the GDPR applies alongside Legislative Decree No. 196 of 30 June 2003, as amended by Legislative Decree No. 101 of 10 August 2018 (hereinafter collectively the "Regulation").

In all non-European countries in which Babylon Cloud operates, Babylon Cloud undertakes to comply with the GDPR as a regulatory framework to ensure the highest standard of protection for

customer and individual user data. Babylon Cloud also undertakes to adopt any higher security standards in force in individual countries under their laws or security regulations.

5.3 Operational Application

Babylon Cloud recognizes its responsibility and undertakes to protect all data entrusted to the company by users against loss, misuse or unauthorized access. To protect users' personal data, the company relies on its ISMS and a set of protective technologies and corporate procedures. Personal data protection, as required by the Regulation, is implemented in accordance with the principles of privacy by design and privacy by default.

This policy applies to all bodies and levels of Babylon Cloud. Its implementation is mandatory for all personnel and forms part of the contractual arrangements with any external party involved in personal data processing. Babylon Cloud permits external disclosure of information only for the proper performance of activities and in compliance with applicable rules and regulations.

Babylon Cloud has established and keeps up to date:

- a) a record of processing activities;
- b) a data protection impact assessment that provides awareness of the level of exposure of its data management systems to threats and determines the actions needed to identify appropriate and adequate security measures and mechanisms to ensure personal data protection.

The general principles of information security management are based on a number of fundamental elements, as also provided for by the ISMS, in particular:

- ✓ an up-to-date inventory of company assets relevant to information management is maintained, with an owner assigned to each asset;
- ✓ information is classified according to its criticality so that it is managed with consistent and appropriate levels of confidentiality and integrity;
- ✓ to ensure information security, each access to systems is subject to an identification and authentication procedure;
- ✓ procedures are defined for the secure use of company assets and information;
- ✓ full awareness among personnel of information security issues is encouraged;

- ✓ to enable timely incident management, everyone must report any security-related issue;
- ✓ unauthorized access to premises and equipment where information is processed must be prevented;
- ✓ compliance with legal requirements and information security principles is ensured in third-party contracts;
- ✓ a business continuity plan is in place to enable the company to respond effectively to unforeseen events, ensuring the recovery of critical services within time frames and through methods that limit adverse consequences for the company's mission.

Compliance with legal provisions, statutes, regulations, contractual obligations and all information security requirements is ensured, minimizing the risk of legal or administrative penalties, significant losses or reputational damage.

6 IMPLEMENTATION OF THE IMS

The Babylon Cloud IMS, comprising its various elements—policies, objectives and processes—is established and implemented to achieve quality and information security objectives in a context of environmental responsibility and energy independence.

Accordingly, the scope of the IMS extends to all Babylon Cloud activities, customer service delivery processes, administrative processes and support processes.

All Babylon Cloud personnel, suppliers and contracted third parties involved in processing information within the scope of the IMS are responsible for implementing this policy with the support of the Management that approved it.

Babylon Cloud Management endorses the principles and objectives of the IMS and fully supports its implementation and maintenance program by providing the necessary resources. Management approves and issues this Babylon Cloud IMS Policies document, which serves as the overarching policy reference for all other IMS documents.

7 REVIEW

This policy is reviewed regularly by Management, or whenever significant changes affect the IMS, to ensure its continued suitability, adequacy and effectiveness.