

## KDDI Euro Bloc – Information Security Policy Statement

The KDDI Euro Bloc of companies are committed to fully complying with relevant laws and regulations in relation to Information Security, Protection of Personal Information and protecting information assets from a wide range of infringement incidents to ensure the confidentiality, integrity and availability of information assets of the Company.

When specified, Euro Bloc Information Security requirements will align with KDDI Corporation rules and regulations. This Information Security Policy should be read in conjunction with the [KDDI/Telehouse] Data Protection Policy and the Data Retention, Archiving and Deletion Policy.

The Euro Bloc pursues a policy of continuous improvement, seeking every opportunity to identify risks, evaluate and take action in line with ongoing efforts to grow the business.

For the aforementioned purpose, the Company will:

1. Establish a working structure in the Euro Bloc to deal with Information Security challenges
2. Develop necessary internal rules to enforce this policy, 'Enforcement Rules'
3. Check all the information assets and business processes, classify and manage appropriately
4. Analyse threats to information assets and business processes, estimate their probability, understand potential adverse impacts on the Company's business and thus identify and assess the risks associated
5. Develop the measures to manage and control the identified risks, 'Control Measures', based on the aforementioned analysis and the assessment to put into force
6. Conduct periodical and extraordinary internal audits on the Enforcement Rules and the Control Measures, etc. in terms of their effectiveness and enforceability. Based on the results review, and if appropriate, amend this policy, the Enforcement Rules and/or the Control Measures or take any other step to ensure Information Security
7. Take appropriate actions to maintain this policy as well as apply enforcement to all identified stakeholders who have access to the information assets of the Company
8. Ensure all Euro Bloc employees have an adequate knowledge of the significance of Information Security and faithfully abide by all the provisions of the Enforcement Rules, this Information Security Policy, and all other relevant data security policies. Any actual or threatened infringement of the Relevant Laws or Enforcement Rules shall be reported to line management with immediate effect
9. Set and review objectives annually to ensure Information Security is core to our business operations
10. Ensure continual improvement commitment is included in Information Security performance
11. Any noncompliance with the Relevant Laws or Enforcement Rules will be considered to be an offence, to which the Company will apply appropriate and measured corrective action

Signed

January 2020



Ken Sakai  
European Bloc Chief  
Managing Director, KDDI Europe and Telehouse Europe