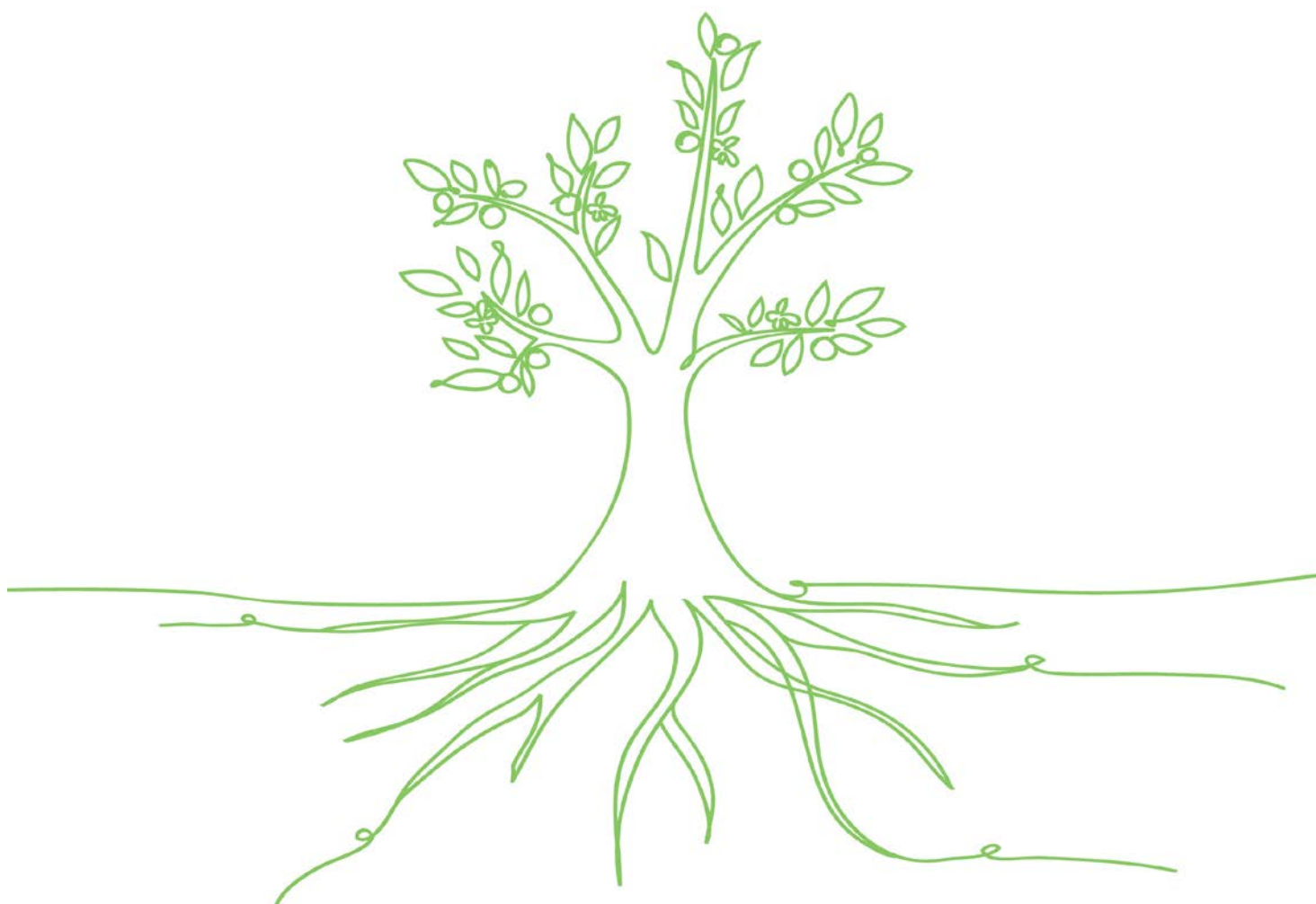


Policy

Information Management



Approved by the Board of Directors of Vår Energi AS on June 25th, 2020



vår energi

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1 INFORMATION

INFORMATION, INCLUDING DATA AND DATA PROCESSING, PLAYS A FUNDAMENTAL ROLE IN MANAGING ACTIVITIES AND REACHING COMPANY TARGETS.

- Vår Energi values information as a vital company asset, aimed at supporting the decision-making process.
- Vår Energi is committed to identifying, collecting, processing and organising all information in a clear, prompt, accurate, truthful and complete way in all the company processes during which the information is produced and managed, using a uniform language.
- Vår Energi guarantees information diffusion and usability based on users' responsibilities, its traceability for reconstructing sources and decision-making processes and, if required, its storage.
- Vår Energi manages information in compliance with laws and regulations in force; in particular, Vår Energi complies with privacy and inside information treatment obligations.
- Vår Energi is committed to guaranteeing the security of information in order to ensure the protection of trade secrets, based on the significance of said information, and is committed to assessing risks with the purpose of identifying the most appropriate security measures.



2 INFORMATION SYSTEM

THE COMPLEXITY OF THE ENVIRONMENT IN WHICH VÅR ENERGI OPERATES REQUIRES A RAPID AND FLEXIBLE DECISION-MAKING PROCESS. FOR THIS PURPOSE, IT IS NECESSARY TO HAVE INFORMATION AT DISPOSAL IN AN EFFICIENT AND EFFECTIVE MANNER.

- Vår Energi is equipped with information systems which consider technologies, organisational structures and processes so as to properly manage information on the grounds of its significance.
- Vår Energi adopts information systems that allow identification, management, traceability, storage and retrieval of information.
- Vår Energi is committed to continuously developing, maintaining and improving information systems over time in order to make them usable and meet business and company process requirements.
- Vår Energi works to identify and adopt security models that may ensure operational continuity, even in emergency situations.
- Vår Energi defends the integrity of its information systems in order to ensure information privacy, protection and storage.
- Vår Energi provides access to company information systems in different ways according to the roles and responsibilities assigned to its people and the relevance of the information.



3 COMMUNICATION

AN INTEGRATED COMMUNICATION SYSTEM IS THE INSTRUMENT THROUGH WHICH INFORMATION IS EFFECTIVELY DISSEMINATED AND DIRECTED TO VARIOUS INTERNAL AND EXTERNAL RECIPIENTS.

- Vår Energi is equipped with an integrated communication system made up of various channels that are consistently managed, and chosen according to the recipients and the significance of information.
- Vår Energi arranges its communications to ensure compliance with laws and regulations in force and protection of trade secrets.
- Vår Energi undertakes to make sure that any information communicated is clear, truthful, accurate and sent to proper internal and external recipients in a transparent way.
- Vår Energi disseminates information internally and externally suitably with the company's values, strategies and image.
- Vår Energi appoints people in charge of communication activities thus ensuring information consistency through the various channels and its compliance with the company's targets and strategies.

