

OPERA

INFORMATION SECURITY MANAGEMENT SYSTEM

ISMS Policy

Document Control

This document is available to Opera Group employees. An electronic copy of this document is available on the Intranet.

Revision History

Date	Version No.	Sections Affected	Change Notes	Prepared By	Reviewed By	Next Review Date
20/01/25	D1.0	Whole document	Creation of document	External Consultant	Group ISO	Jan 2026
10/07/25	1.0	Whole document	Document Approval	External Consultant	Group ISO	July 2026
April 2026	1.1	Whole document	Rebranding of document and Update of sections	External Consultant	Group CTO	August 2027

Approved By: ISMS Committee

Date: 10/07/25

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ISMS-POLICY-ISMS Policy	Version: 1.1
Owner: ISMS Manager	Last Review Date: August 2026
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Abbreviations

Abbreviation	Definition
IT	Information Technology
IS	Information Security
ISMS	Information Security Management System

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1. Purpose

The purpose of this ISMS Policy is to communicate Opera Group's commitment to protecting information assets and maintaining an effective Information Security Management System in accordance with ISO/IEC 27001:2022.

2. Background

Opera is a privately held financial services group building the next generation of fiduciary, corporate and fund administration businesses. Opera brings together independent firms that share a commitment to people, purpose and long-term value – supporting them with strategic capital, operational expertise and cultural alignment.

Backed by Pula, the family office of fintech pioneer, Stephen Lansdown CBE, and like-minded investors including Sealyham, the family office of Tom Scott, Opera offers an alternative to traditional private equity. Empowering firms to scale, innovate and modernise without compromising their legacy or values. With a technology-first mindset and a people-first culture, the Opera group serves both the established and the emerging faces of global wealth – from multi-generational families and corporates to digital entrepreneurs and next-gen wealth creators. Redefining what it means to be a financial services group: agile, data-driven and designed to meet the needs of clients today – and tomorrow.

Opera's growing portfolio includes Accuro, Amber (now "Oak Bahamas"), HFL, Meritus and Oak, with operations across eight jurisdictions: Bermuda, Geneva, Guernsey, Isle of Man, Jersey, London, Mauritius and The Bahamas. The group's nearly 600-strong team administers assets totalling \$73 billion.

3. Scope of the Policy

This policy applies to all employees and relevant stakeholders of Opera Group.

4. Policy Statement

Opera Group has implemented an Information Security Management System (ISMS) in line with the international standard for information security, ISO 27001:2022 to maintain an adequate level of information security for the benefits of its interested parties including but not limited to management, employees, clients.

In line with its strategic direction, Opera Group commits to:

- Communicate and enforce this ISMS Policy at all levels of the organisation and ensure it is available to all its interested parties, as appropriate.

- Comply to all applicable laws and regulations, contractual obligations, and requirements of ISO 27001:2022.
- Adopt a risk management approach to identify and continually assess and treat information security risks.
- Ensure confidentiality, integrity, and availability of relevant information in all its processes.
- Protect information assets against unauthorised access, modification, loss or destruction.
- Establish, maintain and test business continuity plans to ensure resilience.
- Provide adequate resources to maintain and improve the ISMS.
- Maintain an effective and efficient ISMS based on the requirements of ISO 27001:2022 and seek its continual improvement.

5. Responsibilities

Responsibility for upholding this policy lies with the Management Team.

The ISMS Project Steering Committee is responsible for overseeing the implementation of information security policies and procedures across Opera Group and monitoring their consistent application.

Management shall require all personnel to apply information security in accordance with this policy, supporting topic-specific policies, and related procedures of Opera Group.

6. Non-Compliance

Failure to comply with this policy may result in disciplinary action.