



Self-Certification: Security Policy

MEDLEY, INC. (hereafter, "the applying entity") hereby self-certifies the following matters.

SC5.1-1.1

The applying entity will appropriately protect confidentiality of data and prevent unauthorized access to data and services.

SC5.1-1.2

The applying entity will maintain a mature, appropriately funded and staffed security Program, following a recognized, modern security framework based on risk management (such as the ISO27000 series, COBIT, HITRUST CSF, legally required security frameworks, or equivalent). The security Program must be in place prior to delegation, and exist through at least the period of the Base RA.

SC5.1-1.3

The applying entity is aware of and has designed its systems and business to comply with the relevant privacy and security regulations for all countries in which it operates.

A handwritten signature in black ink that reads "Shunsuke Miura".

Shunsuke Miura

Executive Officer, CIO

MEDLEY, INC.

Date: July 28, 2026