Scytale AI, on behalf of Nebius B.V.
Schiphol Boulevard 165,
1118 BG Schiphol,
The Netherlands

Date: 25 August 2025

Confirmation of Compliance with the NIS2 Directive

The NIS2 Directive (Directive (EU) 2022/2555) is the European Union's updated cybersecurity framework, aiming to strengthen the overall level of cybersecurity across the EU. Effective as of 18 October 2024, NIS2 imposes enhanced obligations on essential and important entities to ensure they implement appropriate cybersecurity risk management, governance, and incident reporting measures.

As a security-conscious and responsible organization, Nebius B.V. fully acknowledges the importance of NIS2 compliance. We have taken comprehensive steps at both operational and executive levels to ensure alignment with the directive's objectives, including managing cyber risks, safeguarding critical services, and enhancing trust in our digital operations.

In alignment with the NIS2 Directive, Nebius B.V. has implemented the following measures:

- The company has identified its Member State of establishment and reviews jurisdictional alignment on an annual basis.
- A cybersecurity risk management framework has been approved by senior management, incorporating both technical and organizational measures.
- Guidelines and internal policies are reviewed and updated regularly to reflect the latest European, international, and national standards.

- DNS and name server maintenance practices are in place, supported by ongoing monitoring and logging to detect potential anomalies.
- Incident handling procedures have been developed and tested, enabling prompt reporting and coordinated response to significant incidents.
- A business continuity and disaster recovery plan is implemented and tested annually to ensure resilience against operational disruptions.
- Employee training programs include cybersecurity awareness, individual responsibilities under NIS2, and response protocols.
- Vendor and third-party risk management processes ensure that all service providers adhere to security expectations and do not introduce undue risk.
- A dedicated process exists for the registration and management of TLDs, including annual verification and updates.
- Where applicable, legal opinions from external counsel confirm jurisdictional obligations under NIS2.

Nebius B.V., supported and assessed by Scytale AI, is committed to ongoing alignment with the NIS2 Directive and to continuously strengthening our cybersecurity posture to protect critical operations, data, and our stakeholders.

Should you have any questions or require further information regarding Nebius B.V.'s NIS2 compliance measures, please do not hesitate to contact us.

Sincerely,

Guy Horowitz
Chief Operations Officer
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