



Integrated Management System Policy



Corporate Policy on Quality, Environment, Occupational Health and Safety, Information Security, Service Management and Business Continuity

The constantly evolving context in which organisations providing IT services currently operate demands continuous and careful analysis of both internal and external factors that increasingly impact an organisation's ability to achieve its corporate objectives.

It becomes, therefore, more and more challenging to identify customer/client needs and meet their expectations - especially in light of the growing demands for higher quality of delivered services and for proper service management. At the same time, there is heightened awareness regarding how information and personal data are handled, as well as the need to fulfill the requirements and expectations of other interested parties (service users, partners, employees, suppliers, regulatory bodies, etc.).

For these reasons, Webgenesys SpA, in order to provide further assurances to the clients of its services (including those offered via Cloud SaaS), has deemed it appropriate to implement an Integrated Management System for Quality, Environment, Occupational Health and Safety, Information Security, Service Management and Business Continuity, in compliance with UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI ISO 45001:2018, ISO/IEC 27001:2022 (extended to the ISO/IEC 27017:2015 and ISO/IEC 27018:2019 Guidelines), UNI CEI ISO/IEC 20000-1:2020 and UNI EN ISO 22301:2019.

Indeed, from the company's perspective, this management system constitutes the best solution to demonstrate Webgenesys SpA's commitment to meet client/customer requirements, ensure the quality of delivered services, prevent environmental pollution, improve health and safety conditions in the workplace, preventing accidents, injuries, and occupational illnesses, provide the highest level of service and guaranteeing maximum reliability, protect the information and personal data processed on behalf of clients/customers, gain an opportunity to review the corporate organisational structure and, at the same time, address appropriately the new challenges posed by the market to company management.

To achieve these ambitious objectives and to improve its approach to quality, environment, occupational health and safety, service management, information security, and business continuity, as well as to enhance the services delivered, management has based the implementation of the system on a process-oriented approach. This includes analysing the context in which the company operates and intends to operate, identifying internal and external factors that affect the organisation, identifying interested parties, assessing risks and opportunities and related mitigation/enhancement actions, assessing information security risks and related processing activities, analysing the operational impact and assessing the risks of potential business disruptions, defining strategies and solutions for business continuity, and committing to the continuous improvement of the system's effectiveness.

Through this integrated management system, Webgenesys SpA also aims to:

- Prevent environmental pollution
- Eliminate hazards and reduce risks to the health and safety of workers
- Protect the company's information assets - both internal and external, whether threatened intentionally or accidentally - including employees' personal data, as well as the personal data and information processed in the provision of Cloud services on behalf of clients/customers, and generally the personal data of all those involved in processing activities
- Provide clients with application solutions, including in Cloud SaaS mode, in compliance with ISO/IEC 27017 and ISO/IEC 27018 guidelines
- Ensure business continuity through appropriate strategies that enhance the organisation's resilience

- Maintain and demonstrate fair business dealings with users, customers, suppliers, and partners
- Show that the services provided do not, either directly or indirectly, increase risks for users, customers, suppliers, or other interested parties

In order to pursue these goals, Webgenesys SpA has defined - through documented procedures and information - the methods and criteria for assessing risks/opportunities and the measures to address them, evaluating their impact on the organisation itself.

To achieve these objectives, company management is committed to meeting all applicable binding requirements, including those related to quality, environment, occupational health and safety, service management, and information security. Management also undertakes to comply with the SLAs (Service Level Agreements) contractually agreed with the client/customer and to pursue the continuous improvement of the Integrated Management System.

Specifically, management is committed to ensuring that:

- The Integrated Management System on Quality, Environment, Occupational Health and Safety, Information Security, Service Management and Business Continuity is continuously improved
- Appropriate measures are implemented to keep the organisation's environmental aspects under control
- Adequate prevention and protection measures are implemented and monitored to prevent workplace accidents and injuries, as well as occupational illnesses
- Compliance is ensured with the applicable legislation, with particular reference to laws relating to the environment, occupational health and safety, information security, business continuity and service management applicable to the organisation
- Individuals who wish to submit good-faith or reasonably founded and confidential reports can do so without fear of retaliation
- The risks to which the company is exposed are mitigated/eliminated and desired outcomes are enhanced, thereby reducing the effect of uncertainty on expected results
- Client/Customer needs are identified in order to fully satisfy their expectations while complying with contractual requirements
- The corporate organisational structure is optimized, and the effectiveness of service delivery processes is increased to control internal costs, including through more rational use of resources
- Competence, awareness, knowledge, collaborative spirit, and vigilance are all enhanced among staff with regard to Quality, Environment, Occupational Health and Safety, Information Security, Service Management and Business Continuity
- The information and data processed are protected from unauthorised access, loss, destruction, or accidental damage through appropriate technical and organisational measures
- Subject to confidentiality, data and information integrity and availability are ensured for authorised personnel whenever they need them
- Business continuity is guaranteed and the impact on the business is minimised in the event of a crisis, ensuring a rapid return to normal operations
- Service continuity is guaranteed in order to comply with the requirements of current regulations and contractual obligations, as well as to ensure reliability for customers
- Corporate business continuity plans are drafted, continually updated, and regularly tested for effectiveness

- All data and information security breaches, as well as any security incidents, are managed appropriately and promptly reported in accordance with relevant legal requirements
- Service incidents are recorded and adequately analysed, the underlying problems are identified, and appropriate actions are defined to restore services in compliance with the contractually defined SLAs
- Any detected weaknesses are promptly reported to the relevant persons and analysed for possible corrective actions
- Personnel receive suitable training in Quality, Environment, Occupational Health and Safety, Information Security, Service Management, Business Continuity, and, more generally, the Integrated Management System
- SLAs agreed with the Client are met when providing IT services
- Documentation for the Integrated Management System is constantly updated, with particular attention to IT Services documentation, in light of ongoing organisational changes
- A high level of technical expertise is maintained among company personnel to continuously ensure compliance with contractual SLAs and the achievement of corporate objectives

By implementing this policy and applying everything described in the documented information of the Integrated Management System, management intends to fulfill its commitment to comply with UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI ISO 45001:2018, ISO/IEC 27001:2022 (extended to ISO/IEC 27017 and ISO/IEC 27018 guidelines), UNI CEI ISO/IEC 20000-1:2020 and UNI EN ISO 22301:2019.

Alongside this primary objective, Webgenesys also pursues the following strategic objectives:

- **Quality of service:** offering a customized service backed by ongoing and skilled technical support, also through on-call availability
- **Flexibility:** the ability to analyse, deliver, and maintain a service according to a client's implicit and explicit requests, as well as anticipate their expectations
- **Innovation:** developing cutting-edge technological solutions to offer clients
- **Confidentiality and Integrity** of managed information assets
- **Availability** of managed information assets: Information must be accessible and usable upon request by an authorised entity
- **Privacy:** particular attention paid to personal data in line with EU Regulation 2016/679
- **Compliance** with binding, regulatory, and contractual requirements
- **Achievement** of budget targets in terms of revenue and margins (EBITDA)

To achieve these objectives, management is committed to ensuring this policy is made available and disseminated at all levels of the organisation and to all interested parties, as appropriate.

Given that failure to comply with this policy could lead to negative consequences for the quality of delivered services, non-fulfillment of SLAs agreed upon contractually, and result in the risk of loss of confidentiality, integrity, and availability of the data and information processed, management has established that anyone who violates the contents of this policy will be subject to disciplinary action in accordance with the Company Regulations and Disciplinary Code.

Finally, management undertakes to review this policy regularly, along with any changes affecting it, to verify that it remains suitable for the activities performed and to assess Webgenesys SpA's ability to meet the needs of Users, Customers, Suppliers, Partners, and other interested parties.