

Integrated Policy

Quality, Environment, Occupational Health and Safety, Service Management and Information Security, Social Responsibility, Gender Equality, and Anti-Corruption Prevention

Responsibilities

	Name	Function
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Distribution List

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The BV TECH Group (hereinafter also referred to as the Organization) pursues its business objectives by integrating strategic and operational management with market demands. It ensures high service, quality, and information security standards while considering environmental impact and guaranteeing safe and healthy working conditions for its employees. It also focuses on preventing corruption while maintaining high service levels to protect numerous Clients who entrust their business to the Group's operations.

Therefore, the Organization must balance its natural profit objectives with the social responsibility of its activities.

The companies within the BV TECH Group, namely BV TECH, PROGESI, and T BRIDGE, have adopted an Integrated Management System based on the following standards: Quality (ISO 9001), Occupational Health and Safety (ISO 45001), Environment (ISO 14001), Information Security (ISO/IEC 27001), including guidelines ISO/IEC 27017:2015 and ISO/IEC 27018:2019, Service Management (ISO/IEC 20000-1), Gender Equality (LG UNI/PdR 125), Anti-Corruption Prevention (ISO 37001).

QUALITY AND CONTINUOUS IMPROVEMENT

The BV TECH Group is customer-oriented and pursues continuous improvement in its business and support processes, as well as in the products/services it provides.

For specific business process phases and project needs, the BV TECH Group may collaborate with other Organizations, ensuring they meet the required qualifications and maintain the necessary personnel competencies through second-party audits.

The Organization focuses on innovation and technology, ensuring its territorial presence through strategic acquisitions of companies operating in engineering, IT services, and telecommunications sectors, adhering to the parent company's regulatory frameworks.

To achieve this, the Organization commits to:

- Providing high-quality services on time and at optimal costs. The goal is to stand out in the market through professionalism, enabling the company to handle specialized sectors, such as healthcare, while meeting contractual deadlines. Costs are kept competitive through careful and rigorous management control.
- Identifying and fulfilling the needs and expectations of all stakeholders, dedicating time to customer and stakeholder relationships to anticipate new requirements and act as a trusted partner.
- Planning and implementing actions to manage non-conformities, addressing risks and opportunities, and enhancing the Quality Management System to achieve optimal results.

INFORMATION SECURITY AND SERVICE MANAGEMENT

The BV TECH Group considers data security protection as an integral part of its activities and a strategic commitment within its overall organizational goals.

The Information Security Management System (ISMS) is designed to support software development for Clients, mainly in defense and public administration sectors, as well as ICT service delivery, including SaaS solutions.

To meet information security objectives and manage risks effectively, the Organization commits:

- To comply, in the performance of professional activities, with the security requirements derived from the specific design specifications, contractual agreements, and, where applicable depending on the scope of the specific project and the criticality of the object to be developed, the requirements defined by the Client's reference standards, including the basic information security requirements applicable to the design and implementation of the Cloud service.
- To take a leading role in the development and configuration of ICT services, communicating and promoting the importance of achieving and exceeding the defined objectives while also ensuring that customer requirements are determined and measured objectively. The company's management is responsible for the coordination and management of all services and, therefore, ensures the availability of the necessary resources to plan, implement, monitor, and improve service delivery.
- To ensure that, in the management and execution of any project/service, regardless of its type, the fundamental principles of information security are upheld.
- To define and apply a methodology for analyzing and assessing risks related to the company's core business, with the aim of identifying threats and vulnerabilities within its ISMS and implementing appropriate countermeasures.
- To ensure that the ISMS involves the entire corporate organization, from the employer to each individual worker, according to their roles and competencies; to this end, employees will be made aware of and trained to carry out their tasks safely and assume their responsibilities in this regard.
- To plan business activities, especially those concerning operations at external client sites, through the prior definition of general and specific security plans for each client. These aspects will also be reflected, where possible, in external contractual agreements.
- To support business processes with appropriate and, where possible, certified tools to ensure compliance with key requirements in a structured manner, such as access logs, information segregation, and data encryption.
- To continuously consult with employees, and in particular their representatives, on the improvement of the ISMS during Management Reviews.
- To promote continuous improvement in security and prevention through monitoring activities in line with the ISMS.
- To include security requirements in agreements with third parties through contractual clauses aimed at ensuring the integrity, availability, confidentiality, and non-disclosure of corporate information, in the interest of the Organization itself and its client companies.
- To monitor, through a monitoring system, the implementation of the ISMS in the work activities of its resources, verifying compliance with legislative and regulatory provisions regarding information security.

- To periodically review, at least annually, the security policy and the ISMS, as well as in the event of significant changes concerning information security.
- To conduct periodic and independent audits (by BV TECH), at least annually, on the implementation aspects of the ISMS.
- To define and communicate corporate objectives and their implementation programs, also in compliance with existing certification frameworks and any additional certifications the Company may need to obtain.
- To closely monitor the interdependencies between the Organization's production and service activities and those of other operational units present at client sites, including through participation in and activation of specific coordination meetings.
- To raise awareness of information security issues within the Organization by providing specific internal training courses for all employees without discrimination, with a frequency of at least once a year or in the event of significant updates to corporate policies and procedures related to the Information Security Management System.

ISO/IEC 27017 and 27018 Extension

BV TECH, given its Cloud-based solutions (SaaS), has extended its information security scope to include the ISO/IEC 27017 guideline, "Code of practice for information security controls based on ISO/IEC 27002 for Cloud services," and ISO/IEC 27018, "Code of practice for the protection of personally identifiable information (PII) in public Clouds acting as PII processors."

Information Security for Cloud Services

As a Cloud service provider, BV TECH has strengthened its information security policy to better manage the supply processes associated with its Cloud services and optimize their usage. The key drivers behind this strengthening initiative are:

- In a continuous improvement approach, a dedicated information security baseline has been defined for the design and implementation of Cloud services;
- Continuous assessment of risks associated with personnel and/or authorized internal entities;
- Segregation and isolation of customer information and multi-tenancy Cloud services (including virtualization) to prevent compromise and cross-customer data exposure;
- Management of access to Cloud service customer resources by BV TECH personnel and, if applicable, Cloud service provider personnel, ensuring security measures are in place;
- Management and review of the administrative access control procedure for Cloud services.

Governance of Changes and Communication to Cloud Service Customers

- Governance of changes and communication of those changes to Cloud service customers;
- Virtualization security;
- Access to and protection of Cloud service customer data;

- Management of the lifecycle of Cloud service customer accounts;
- Communication of breaches and guidelines for information sharing to support investigations and forensic analysis.

Guidelines for Personal Data Protection in the Cloud

BV TECH, recognizing the importance of data protection within the triad of Confidentiality, Integrity, and Availability, is strongly committed to compliance with applicable regulations on personal data protection. This commitment is particularly emphasized within the contractual terms agreed upon between the public Cloud personal data controller and BV TECH's customers, with a specific focus on Cloud services.

The contractual agreements that BV TECH establishes with its suppliers define clear responsibilities among the public Cloud personal data controller, its subcontractors, and the Cloud service customer, taking into account the type of Cloud service involved.

BV TECH has appointed its own Data Protection Officer and, in adherence to the provisions of European Regulation 679/2016 and relevant legislation, places great emphasis on its responsibilities as a Data Controller. It carefully assesses the associated risks, not only regarding Data Protection but throughout the entire ICT supply chain, ensuring the security of personal data.

ENVIRONMENT, HEALTH, AND SAFETY AT WORK

The BV TECH Group upholds and promotes respect for human rights and considers the protection of the integrity, health, rights, and well-being of its employees, as well as the environment, as primary and fundamental elements in the execution and development of its activities.

The Organization is committed to:

- Managing its activities related to health, safety, and labor rights in compliance with the highest international standards, ensuring safe and healthy working conditions to prevent work-related injuries and illnesses, appropriate to the organization's purpose, size, and context, as well as the specific nature of its occupational health and safety risks and opportunities;
- Communicating and disseminating information regarding health, safety, labor rights, and environmental issues to internal and external stakeholders, engaging in dialogue with them, and actively collaborating with institutional and academic bodies;
- Promoting initiatives for the consultation and participation of employees and their representatives in matters related to the environment, health, and workplace safety;
- Protecting the environment by assessing risks and reducing the environmental impact of its products and services throughout their entire lifecycle.
- Identify and monitor aspects that may have an environmental impact (such as water discharges, depleted batteries, radio frequency radiation, and obsolete equipment).
- Investigate and address any causes leading to the improper use of available material resources (paper, water, electricity, energy, PCs, phones, internet keys...), optimizing consumption and promoting recycling whenever possible.
- Prohibit and refrain from supporting child labor and forced labor in any form.

- Ensure equal opportunities and freedom of association while promoting the development of each individual.
- Oppose the use of corporal punishment, mental or physical coercion, and verbal abuse.
- Comply with labor laws and industry standards regarding working hours and ensure that wages are sufficient to meet employees' basic needs.
- Establish and maintain procedures to assess and select suppliers and subcontractors based on their level of social, environmental, and inclusivity responsibility.
- Adopt a zero-tolerance policy against any form of corruption, regardless of jurisdiction, even where such practices may be accepted, tolerated, or not legally prosecuted.
- Engage all levels of the Organization and all BV TECH Group employees by ensuring that responsibilities and operational procedures are clearly defined, appropriately communicated, and well understood, while also promoting communication and training for all stakeholders.
- Continuously improve the suitability, adequacy, and effectiveness of management systems, maintaining documented information as evidence of ongoing improvement.
- Expand documented information, considering the size of the Organization, its activities, processes, products, and services.
- Demonstrate compliance with legal and regulatory requirements in relation to the complexity of processes, their interactions, and employee competence.
- Comply with applicable legal requirements and other obligations subscribed by the Organization concerning its environmental aspects and workplace safety.

The BV TECH Group's sustainable development strategies include a commitment to the continuous improvement of environmental, health, and workplace safety aspects related to its activities.

GENDER EQUALITY

The BV TECH Group promotes gender equality by valuing diversity and inclusion through the adoption of organizational and management mechanisms based on transparency, understanding, work-life balance, the elimination of stereotypes, and respect for its workforce.

The Organization is committed to:

- Ensuring impartiality, identifying and eliminating disparities, and offering equal professional opportunities through performance evaluation, training, and career development opportunities.
- Implementing specific action plans to promote inclusion, define a strategy and development processes, and effectively manage human resources.
- Raise awareness among employees on Diversity and Inclusion topics.
- Promote inclusive leadership models and awareness of the importance of addressing inequalities at all levels of the organization.
- Establish a set of guidelines to ensure a transparent, inclusive work environment that safeguards employees' physical and mental well-being.

- Support work-life balance through initiatives related to mobility and flexibility.
- Enable employees to freely express their opinions.
- Implement specific programs regarding parental leave and the care of vulnerable family members (elderly, people with disabilities, ill individuals, etc.).
- Ensure the consistent use of respectful and neutral language in documents, written communications, and verbal interactions.
- Identify and meet the needs and expectations of all stakeholders.

ANTI-CORRUPTION PREVENTION

The BV TECH Group voluntarily implements an anti-corruption management system to enhance internal policies, procedures, and continuous improvement efforts. Corruption poses serious social, ethical, economic, and political risks, undermining governance, development, and competition.

To achieve the goal of corporate management aimed at ensuring appropriate anti-corruption measures, the Organization:

- Prohibits corruption at all levels within its organization and requires its partners and suppliers to comply with applicable anti-corruption laws.
- Ensures compliance with applicable anti-corruption laws that apply to the organization.
- Allocates adequate and appropriate resources for the effective operation of the anti-corruption management system.
- Commits to providing a framework to establish, review, and achieve objectives for corruption prevention.
- Pledges to meet the requirements of the anti-corruption management system.
- Encourages the use of procedures for reporting suspected acts of corruption made in good faith or based on a reasonable belief, confidentially and without fear of retaliation.
- Commits to the continuous improvement of the anti-corruption management system.
- Establishes, within the Anti-Corruption Management System, a dedicated Compliance Function for Corruption Prevention, which is granted the necessary authority and independence. Specifically, this function is empowered to effectively carry out its role.
- Defines and outlines the consequences of non-compliance with the anti-corruption prevention policy, committing to take appropriate disciplinary or legal actions against individuals who engage in unlawful behavior that contradicts the principles of this Policy, while providing stakeholders with communication channels (e.g., Whistleblowing) to encourage the reporting of suspected phenomena in good faith, without fear of retaliation.
- Promotes and communicates an adequate culture of corruption prevention both internally and externally, through its policy.

SOCIAL RESPONSIBILITY

The BV TECH Group is committed to fully adhering to government directives issued by the relevant state authorities in every challenging situation, identifying solutions and approaches to minimize negative aspects and overcome critical issues with strong determination and utmost civil and human commitment, utilizing highly professional figures both within and outside the Organization. The BV TECH Group is committed to the continuous improvement of its Policy and programs and to implementing procedures, rules, and instructions to ensure that the values expressed in this policy are reflected in the behavior of every employee and collaborator, as well as ensuring their ongoing training. This Policy is disseminated to all company figures and made publicly available online on the websites of all the Group's companies.

The Group's activities align with its Code of Ethics.

Date: 27/01/2025

Signed: Raffaele Boccardo