

The Management and staff within the CAD IT Group companies consider quality and information security and occupational health and safety as a fundamental basis for the activities they perform. Their primary objective is to obtain Customer satisfaction by protecting their proprietary information and that of human resources in order to minimise the risk of any possible damage caused by deliberate or involuntary internal or external security incidents or by potential threats, as well as to pursue the values and achievement of improvement targets and of the level of occupational health and safety within the company organisation. Responsibility in applying this Policy and in managing the system regards the Company Organisation as a whole, from the management to each individual employee, in accordance with each person's position and competence.

In order to obtain this primary objective, the CAD IT Group has set further aims, including:

- to consider occupational health and safety and the relative results as an integral part of its own organisation and as a relevant aspect in ongoing activities and future planning;
- to provide healthy and safe working conditions for its employees and stakeholders, in order to prevent work-related injuries and illnesses;
- to ensure improvements in the level of occupational health and safety by making human resources, instruments and finances available and defining clear and allocated responsibilities in the matter;
- to ensure compliance with the mandatory regulations applicable at 360° and in particular with regard to the products proposed, health and safety at work and compliance with personal data protection laws; to ensure its own development by favouring the radication of it software products in new territorial areas and in new market segments;
- to increase the efficiency of its own internal procedures in order to produce software of increasingly greater quality;
- to supply quality products and services that meet the initial and subsequent needs and expectations of the customers in relation to the agreed price and in a highly competitive position with regard to best and fair competition;
- to verify that the systems, equipment, work places, operational methods and organisational aspects are such as to safeguard the health of the workers, third parties and the community in which the company operates;
- to identify, by means of appropriate risk analysis, the value of the proprietary information, any possible risks for the workers' health and safety and for the company's procedures, in order to uncover any vulnerabilities and dangers within the company that could make reaching the objectives difficult;
- to manage risk at an acceptable level by planning, activating and maintaining the appropriate countermeasures in terms of information security in order to guarantee the quality of the products and services supplied as well as occupational health and safety;
- to take the necessary actions to prevent occupational accidents and diseases;
- to protect information confidentiality by ensuring that the information is only accessible to authorised persons;
- to protect information integrity by ensuring precision and completeness to the utmost extent as well as information processing methods;

Rev. 6

Rev. 6

- to protect information availability ensuring that authorised users can effectively access the information and assets needed to carry out their work at the time they so require them;
- to act quickly and effectively when faced with any requirements that may emerge during working activities;
- to identify the existing hazards and risks within the organisation;
- to promote employee involvement and consultation also by means of their safety representatives;
- to ensure cooperation and collaboration among the various company resources with external business organisations and Associations;
- to define evacuation and emergency plans, contingency plans and, where necessary, plans for the business continuity of activities, keeping them updated and checked to the greatest possible extent;
- to eliminate hazards and reduce as much as possible business risks related to health and safety at work;
- to provide the workers with information and training on matters of occupational health and safety and particularly on company risks, in relation to their security role within the company and operational duties;
- to periodically review the Policy, Objectives and fulfilment of the Integrated Management System in order to constantly improve the company's level of occupational health and safety.

Rev. 6

The Company therefore aims at being able to offer its customers high quality, reliable and safe software products and post-sale assistance and maintenance services.

In order to obtain this aim, the Company endeavours to constantly improve the following in developing its software:

- Functionality
- Maintainability
- Reliability
- Usability
- Efficiency
- Portability, etc...

In relation to assistance and maintenance services, the Company pursues improvement in terms of:

- efficiency and effectiveness of the help desk services (instruments and resources);
- rapidity in resolving customer notifications and/or replies;
- timely adjustment of the software to any changes in the characteristics of the context in which it is inserted.

Rev. 6

The Group's entire organisation is committed to doing its utmost to apply the Integrated Management System by adopting a process approach of a cycle of continual improvement for procedures that, through the Company's consideration of the organisational context and managerial strategies, the defining and planning of objectives, the management of resources, assets, policies and procedures, self-assessment criteria and internal verifications as well as incentives for said improvement, will acquire an increasingly

more significant role in rational and effective management and the achievement of the afore-mentioned objectives.

In applying its own Management Systems, the Group conforms to the legally binding privacy laws, today identified in the European Regulation for the Protection of Personal Data 2016/679 (GDPR) and Legislative Decree 196/03 (Privacy Code) as amended by Legislative Decree 101/2018, regarding the protection of personal data or special categories of personal data (formerly sensitive data). For this reason, Cad It Group process the data lawfully, fairly and in a transparent manner exclusively for the purposes and operations deemed necessary (Data minimisation principle). Furthermore, the Cad It Group makes every effort to ensure the accuracy of the data by keeping up to date it when necessary and keeping it only for the time deemed strictly necessary for executing company activities. The Cad It Group guarantees the Data Subject with access to the personal data within the limits established by the Law and to their cancellation, as well as the right to be forgotten for any particular cases that may be identified. The Group endeavours to protect its own data with the appropriate technical measures and by applying the procedures foreseen in its Management Systems.

Equally important for organisational improvement, effectiveness and efficiency is an approach based on problem prevention rather than on control and correction in hindsight in order to significantly reduce the probability of the occurrence of any incident, accident or other non-conformity.

All levels of human resources are a fundamental element in achieving the objectives set: they have been informed of company objectives in terms of Quality, Occupational Health and Safety and Information Security by putting into effect specific training programmes and by evaluating the results achieved.

Moreover, the Company provides adequate training on matters of Quality, Occupational Health and Safety and Information Security measures.

All company staff and suppliers who are in any way involved in the application of the Integrated Management System, are expected to put this policy into effect with the support of the Management, which has approved it.

The Company is aware that the final user's greater satisfaction, and subsequently the Company's improved image, increased competitiveness and higher earning capacity, are more easily attainable with the involvement and employment of staff at all levels. The employees' contribution in achieving these objectives is indispensable.

At the same time as perfecting the internal organisation, it is also necessary to support all activities carried out and considered necessary to progressively construct greater quality, without forgetting that constant improvement of the System can be more effectively obtained by preventing problems rather than controlling and correcting them in hindsight. In virtue of this, the Company aims at preventing - as far as possible - Information Security incidents and, where this is not feasible, all information security breaches and any weak points should be pointed out to the person in charge and investigated.

All systems (Quality, Occupational Health and Safety and Information Security) converge into one single Integrated Corporate Management System whose aim is to provide the Management with consistent results so that it can make the correct evaluations and set appropriate objectives for the Management System itself in a consistent and well-considered manner and in order to be able to take appropriate decisions in consideration of the organisational context, risks and available opportunities.

This policy has been drawn up and reviewed by the Company Management. All the staff, on the basis of with their own knowledge, is expected to inform the person in charge of Quality, Occupational Health and Safety and Information Security Systems of any weak point he/she may find in the company systems.

This policy is regularly reviewed in order to identify any modifications that may affect it and to ascertain that it always conforms to organisational aims and stakeholder expectations.

The Management