INFORMATION SECURITY POLICY

We are aware that our information assets have fundamental strategic importance and represent a valuable company asset to be protected.

For this reason, we have adopted this information security policy, based on national and international standards such as TISAX and ISO IEC 27001:2022, as well as relevant regulations, such as the European Data Protection Regulation and EU Directive 2022/2555 (NIS2).

Information security is understood as the maintenance of:

- **Confidentiality:** ensuring access to information only to authorized individuals;
- **Integrity:** safeguarding the accuracy and completeness of information and processing methods;
- **Availability:** ensuring access to information and associated assets to authorized individuals without delay.

We are committed to ensuring the confidentiality, integrity, and availability of company information, as well as that of our clients, employees, and stakeholders. We apply the principles of 'need to know', 'least privilege', 'risk-based thinking', and 'security by design & by default' as part of our corporate culture.

As a result of this commitment and based on these principles, we have implemented an Information Security Management System to ensure, through organizational, physical, technological, and personnel management measures, that information security is the result of effective management.

We believe that technical measures alone are not sufficient and must be supported by appropriate procedures, constant monitoring, training, and awareness. We are aware that information security is the tangible result of the responsible and competent participation and commitment of everyone: employees, customers, suppliers, and other stakeholders.

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Our goals for information security are:

- **Ensure confidentiality, integrity, and availability of our business and personal information**, as well as that of our employees and customers, ensuring that it is managed in accordance with national and international regulatory, contractual, and standard obligations to which we adhere;

- **Integrate the requirements of the information security management system within our business processes**, keeping the information security management system always updated, monitored, and aimed for continuous improvement;

- **Assign roles and responsibilities to qualified and competent personnel**, free from conflicts of interest and subordination, in order to outline clear information security management in terms of: governance, incident management, including Data Breaches, crisis management, and business continuity;

- **Be receptive to the risks and opportunities of the external and internal context**, to foster a full understanding of the possible impacts on the information managed by the company and encourage a prompt response;

- **Train and sensitize employees about information security**, the implemented management system and related policies, procedures, and regulations, potential risks, and ways to prevent them;

- **Communicate with competent authorities and interested parties about information security events that may have a significant impact on them**, according to contractual agreements and national and international regulations, and maintain the necessary records to reconstruct events and their causes;

- **Adopt appropriate physical and technological prevention measures**, and prepare response plans for managing crises, incidents, and potential data breaches, ensuring measures suitable for preserving the continuity of information security;

- **Ensure that information security is also maintained by our supply chain** and the technologies we use, sharing with our collaborators the security standards we expect within the collaborative relationship and clearly and transparently distributing the responsibilities of the parties for the security of information exchanged in the collaborative contractual relationship;

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- **Prevent the loss of copyright through the monitoring of the software used,** whether usable online or under license, also considering the introduction of artificial intelligence;

- **Evaluate our information security management system** also through independent and qualified bodies.

Funo, September 11, 2025

Riccardo Cavallari
Managing Director

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