

Document Classification: public
Code: PL-IS-01
Rev:0

INFORMATION SECURITY POLICY

Mission

Arvedi Group operates in a context of continuous evolution, so that Information Security represents for the Group not only a law-related aspect but also a strategic goal that helps to maintain trust of customers, to protect reputation and to guarantee business continuity.

Information Security and data protection of the Group and of its stakeholders are elements necessary to protect the information assets but at the same time a strategic value convertible into competitive advantage.

Arvedi Group, for these reasons, pays also particular attention to suppliers and partners to which information is shared with and to all the elements that support and manage the information framework: the organization, the processes, technological and physical infrastructures, and resources.

Through steps such as identification, evaluation, and mitigation of risks Arvedi Group can define all the organizational, technical, and procedural measures needed to satisfy CIA-requirements:

- **Confidentiality (C)**: information is accessible only to authorized people and is precluded from others;
- **Integrity (I)**: information is accurate, complete, and reliable and each change is controlled. Every attempt to tamper with data by unauthorized persons or caused by events shall be prevented;
- **Availability (A)**: information is available to authorized people in the right time and following modes defined by the Company policies.

Commitment

To achieve the full satisfaction of customers and stakeholders, and to ensure the protection of its own information assets and stakeholder's ones by promoting continuous improvement, Arvedi Group is committed to operate in compliance with information security with a structured and appropriate framework.

Principles and Goals

Arvedi Group aims to obtain measurable results on the following goals:

- Guarantee the respect of company goals and the monitoring of processes and continuous improvement activities in terms of Information Security in coherence to company strategies;
- Guarantee a proper management and protection of company information;
- Deliver products, by monitoring and improving their information security and managing changes in consistency with standards;
- Ensure the adoption and maintenance of a process of potential threats identification and the impacts that such threats could cause on the information assets and services provided, being able to develop a system that can improve resilience and recovery capacity;
- Effectively manage information security incidents, including data breach, through timely communications and the application of appropriate countermeasures;
- Ensure collaborations with qualified technological partners, which guarantee reliability in terms of quality of the services/products offered and guarantee information security and protection of personal data;
- Promote investments in innovation and technological solutions that go along with the growing customer demand while meeting security requirements;
- Promote training and information programmes to ensure competent and efficient working groups;
- Promote awareness and culture within the Arvedi Group on issues related to information security and the protection of personal data;
- Ensure a risk management-oriented approach and appropriate action to address risks and opportunities;
- Ensure compliance with applicable mandatory legal requirements.

Policies, procedures, and operational instructions are detailed in a specific document framework and available to company personnel and stakeholders according to the positions held. Regardless of the role, it is the responsibility of all staff and employees:

- know the contents of this document and contribute to the implementation of the directives and objectives of information security and data protection indicated therein;
- to cooperate in keeping with their responsibilities;

- properly treat the company's information assets;
- report any security and continuity incidents, anomalies, or possible threats.

Cremona, date

12/04/24

Management


FINARVEDI S.p.A.