"IC" Outsourcing

MG920 POL-10.2 MANAGEMENT SYSTEM POLICY INTEGRATED

Function Issuer:	1000 – General Management		
Written by :	Roberto Coppola		
Verified by:			
Approved by:	Francesco Schinaia		
Version	4	Version Date:	03/15/2024
Description of changes	Integration of the information security policy § 4		
Reasons	Integration of ISO 27001 Certification for Standardized Conservation		
Collaborations:			

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1. Introduction to the document

1.1 Purpose and scope of the document

The document describes the integrated IC Outsourcing Management Systems compliant with the standards [ISO9001], [ISO14001], with the UNI/Pdr Practice 125:2022, [ISO27001] and with the LL.GG ISO 27017 and ISO 27018.

The document applies to the Procedure [MG920] Integrated Procedure of the Integrated Management System as part of the "Governance" Process regarding Quality, Environment, Gender Equality, Information Security and Conservation in compliance with the law.

1.2 Level of confidentiality

	Level	Permitted scope of diffusion
X	Public	The document can be disseminated**on the outside**of the company.
	Internal use	The document can only be disseminated**inside of**of the company. Third parties to whom it is communicated have the obligation not to disseminate it.
	Reserved	The document**it cannot be spread**within the company. Its visibility is limited to a small group of people. The indication "Confidential" MUST also be reported in the footer of the document.

1.3 References

[ISO9001]   UNI-EN-ISO 9001 standard - "Quality Management System" UNI-EN-
[ISO14001]   ISO 14001 standard - "Environmental Management System"
[ISO27001]   ISO/IEC 27001 standard - "Information security management systems"
[ISO27017]   ISO 27001 Guideline - for applicable information security controls
to the provision and use of cloud services,
[ISO27018] ISO 27001 Guideline - control objectives, controls and guidelines for the implementation of measures to protect personally identifiable information (PII) in line with the privacy principles set out in ISO/IEC 29100 for l public cloud computing environment.

[PROCESSES]   Set of company procedures that allow the activation of UNI/Pdr 125:2022
[UNI125]   Practice Processes - "Reference practices for Gender Equality"

1.4 Previous versions

Function Issuer:	1000 – General Management		
Written by :	Roberto Coppola		
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Collaborations:			

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Collaborations:			

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Written by :	Roberto Coppola		
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Version	1	Version Date:	09/27/2022
Description of changes	§ 4 update Top management commitment		
Reasons	Extension of certifications for the Marciano and Agnadello warehouse sites		
Collaborations:			

1.5   Terms and definitions

See Company Glossaryhttps://intranet.infocamere.it/web/intranet-ic-outsourcing/glossario
Below are the specific terms of this document:

Term	Description
Steering Committee	Committee established by the Top Management for the effective adoption and continuous and effective application of the Gender Equality Policy.

Quality Committee	Steering Committee extended to the Quality and Services Management System Manager
Management System	Integrated Management System for Quality and the Environment (SGQA)
Safety Committee of the Information	Committee that assesses the decisions to be taken at a strategic level for the management purposes of the Information Security Management System (SGSI)
ISMS system	Information Security Management System for Quality, Environment, Gender Equality and Information Security.

2. Integrated Management System Policy for: Quality, the Environment, Gender Equality and Information Security.

The Policy of the Integrated Management System for Quality, the Environment, Gender Equality and Information Security (hereinafter also simply Integrated Management System) is an expression of the intentions of the General Management and aims to give instructions on the matter for Services and Processes: explains what management intends to do regarding these Systems:

- Allow the renewal of Contracts with CCIAA customers within certain times.
- Efficient cost containment.
- Constantly monitor the performance of suppliers.
- Perform constant monitoring of the environment and the level of staff training.
- Carry out services in such a way as to achieve increasingly better levels of customer satisfaction over time, always keeping in mind the impact on the environment and limiting energy consumption.
- Preserve IT systems from harmful external interactions in order to maintain their confidentiality, integrity and availability - hereinafter better respectively, the ownership of information that is not made available or disclosed to unauthorized individuals, entities or persons; the accuracy and completeness of the data; accessibility and usability upon request by an authorized entity.

The Quality Policy aims to consolidate the chamber's clientele and develop new extra-chamber markets through participation in public tenders for the provision of services that meet market requirements.

IC Outsourcing Scrl wants to consolidate itself and be among the top suppliers of the Chamber of Commerce market, of the Italian Public Administration and of local authorities for:

- Knowledge of customers' needs and requirements through direct communication with them;
- Understanding of how the market sector develops and always being at the forefront also in the environmental field;
- Contribute to the dematerialisation of paper documents through compliant conservation;
- Constantly remember that customers' success runs parallel to ours.

To get to this point, IC Outsourcing is aware that it must:
- bring the principle of continuous improvement into the corporate culture by applying it *day by day* on a personal and team level;
- be convinced that the first and irreplaceable resource is made up of people, with their skills and experience, with the experience of the older ones and the enthusiasm of the younger ones, with their creativity and the desire to be a team. For success, IC Outsourcing believes that it is essential that those who work are proud of what they do and why they do it;

● remember that we have the necessary potential to fill some gaps in the market, trying to present ourselves as a point of reference for our customers;

● consider the Suppliers as partners, rather than simply providers of work and materials, to share with them (rather than impose) the needs of IC Outsourcing and the expectations of our Customers, considering that the Suppliers consider themselves to be part of the extended team.

We take pride in what we do and want our customers to be proud to use our services too.

2.1 Information Security Policy

IC Outsourcing has adopted an information security management system (ISO 27001). The Security Policies constitute the directions and will of the Management in the References of the Security Policies within the icoutsourcing.it website.

IC Outsourcing Scrl (hereinafter ICO) considers information security and the management of a compliant Storage System as its primary objective. This means implementing and maintaining a secure information management system, so as to guarantee:

- Confidentiality – information accessible only to duly authorized individuals and/or processes;
- Integrity – safeguarding the consistency of the information from unauthorized
- modifications; Availability – ease of access to necessary information;
- Control – ensuring that data management processes and tools are safe and tested;
- Authenticity – reliable provenance of information.
- Privacy – guarantee of protection and control of personal data.

The ICO has developed an Information Security Management System (ISMS), following the specified requirements of the ISO/IEC 27001 Standard and a Document Storage Management System according to the Saas cloud by adopting the LL.GG. ISO/IEC 27017 and ISO 27018.

The information assets protected by the ICO are made up of all the information located in the operational headquarters in Padua (Corporate Area), in the Archive (Technical Services and Document Management Area) and in the data centers where company data are managed.

The lack of adequate levels of security can lead to damage to the ICO activity, lack of customer satisfaction, the risk of incurring sanctions linked to the violation of current regulations as well as economic, financial and corporate image damage. The management's commitment is implemented through the definition of an organizational structure suitable for:

- establish corporate roles and responsibilities for the development and maintenance of the ISMS;
- check that the SGSI is integrated into all company processes and that procedures and controls are developed effectively;
- monitor exposure to information security threats;
- activate programs to spread awareness and culture on information security.

The general objectives of the ICO are therefore:
- guarantee the best standards, optimizing and rationalizing company processes and tools;
- guarantee the effectiveness of the SGSI and the Conservation Service in compliance;
- ensure user and customer satisfaction in relation to the quality of information.

All staff must work to achieve the security objectives and in the management of information in the Corporate Area and the Document Management Area, in particular. The application of the management system therefore requires full participation, commitment and effective interaction of all human and technological resources. The continuous growth of the service level will be pursued through regular review of the same, aimed at monitoring the pre-established objectives and recognizing any areas for improvement.

The Management is committed to:
- implement, support and periodically verify this Policy, to disseminate it to all individuals who work for the company or on its behalf;
- ensure the resources necessary for the effective protection of
- information; define information security objectives;
- periodically review the information security objectives and Policy to ensure their continued suitability.

Policy in favor of the environment.

IC Outsourcing applies an environmental policy integrated into corporate strategies, inspired by the principles of sustainable development and respect for nature**.**

Consistent with the above, in carrying out its various business activities, IC Outsourcing undertakes to:
- carry out company activities in compliance with the Laws, Regulations and applicable legislation in general;
- adopt, in carrying out its activities, the necessary precautions for the prevention of pollution of the environment;
- pursue continuous improvement of its environmental performance, progressively reducing the influence of its activities on the environment, in particular with regard to the reduction of waste, the production and disposal of waste, the use of raw materials and support materials, limiting their using and/or preferring, where possible, ecological products;
- reduce the production of CO_2 by adopting measures to rationalize waste, making electrical/electronic equipment more efficient in general, and other initiatives that can offset the production of CO_2.
- constantly monitor its management system to verify improvements in the environmental performance of the company organization over time, and adopt appropriate corrective measures if necessary;
- inform and involve employees and external collaborators of the environmental policy and the objectives pursued by the company, in order to encourage the growth and diffusion of an environmental culture.

3.Policy on gender equality

IC Outsourcing has generated, since its inception, a work environment inclusive of diversity, through the definition of the organisation's commitment to issues relating to gender equality, the valorisation of diversity and the *empowerment* feminine: a constant commitment and contribution from the entire organization in terms of language, policies, processes, organizational practices, and the conscious and unconscious behavior of individuals. It is an essential element of civilization and affirmation of the universal rights of humanity as well as a strategic factor for increasing the creation of value and for the development of the company.

Therefore the Management of IC Outsourcing has undertaken the UNI/Pdr 125:2022 certification path by developing and maintaining a degree of maturity:
- of the organisation's governance model aimed at defining the adequate organizational safeguards and the presence of the minority gender in the organisation's policy and control bodies as well as the presence of processes aimed at identifying and remedying any event of non-inclusion.
- of the main processes in the HR field, relating to the different stages that characterize the life cycle of a resource in the organization based on principles of inclusion and respect for diversity.
- of the organization in relation to gender-neutral access to internal career and growth paths and their acceleration.
- of the organization in relation to the pay differential in the logic of *total reward* therefore also including non-monetary compensation such as systems *welfare and well-being*. of the
- organization in relation to the presence of policies to support parenting in different forms and the adoption of procedures that facilitate and support the presence of women with pre-school age sons and daughters.

To encourage this commitment, the company annually promotes employee participation in training courses relating to ethical principles and *best practices* relating to the topics of inclusiveness, gender equality, sustainability and *work life balance*.

The Organization undertakes to guarantee, also through the adoption of specific internal policies, the maintenance of a Global Strategic Plan and a Management System, integrated into the Quality and Environment system, which:
- does not tolerate any type of discrimination during the entire career path of employees from initial selection up to the highest career levels, passing through the daily work routine
- promotes and supports motherhood/parenthood in all its phases
- aligning one's communication, whether internal or external, with the values   of gender equality
- the production of all necessary prevention activities so that no form of physical, verbal or digital abuse can occur in the workplace
- the dissemination of its Gender Equality Policy, and any updates thereto, within the company and made available on its intranet site

- the definition of a budget necessary to achieve and maintain the objectives of this plan
- the appointment and maintenance of the Guiding Committee (CG) for the effective adoption and application of the UNI/Pdr 125:2022 practice.

4. Top Management Commitment

Top Management demonstrates leadership and commitment to Management Systems through:

a) the assumption of responsibility and effectiveness from July 2021 for Quality and the Environment;

b) the assurance of working to combat Climate Change;

c) the assumption of responsibility and effectiveness from September 2022 for Gender Equality;

d) the assumption of responsibility and effectiveness for the compliant Conservation System;

e) ensuring that policy is established and objectives for quality, environment, gender equality and information security are identified.

f) ensuring the integration of the SGI requirements into the organisation's business processes, as highlighted in the SWOT Analysis (Quality, Environment and Information Security).

g) promoting the use of the process approach and *risk based thinking*, as highlighted in the SWOT Analysis.

h) assurance of the availability of the resources necessary for the SGI, as per the expenditure forecast communicated to the Board of Directors.

i) communicating the importance of an effective SGI to the corporate bodies, asking them to approve the Operating Regulations and the Travel policy.

j) assurance that the integrated Management Systems achieve the expected results.

k) the active participation of human resources.

l) the promotion of continuous improvement through the managerial review, in addition to the process of integrating the System with the reference practice for Gender Equality UNI/Pdr 125:2022 and with ISO 27001.

m) support for other relevant management roles.

Furthermore, Top Management ensures that:

a) the customer requirements and applicable mandatory requirements are determined, understood and satisfied.

b) the risks and opportunities are determined and addressed, as per the SWOT Analysis table.

c) the focus on increasing customer satisfaction is maintained through appropriate tools provided for in the Managerial Review.

5. Objectives for the Integrated Management System

Top Management has defined the objectives to be achieved through the analysis of the "Improvement Plan", to which reference should be made for evaluation. The objectives to be achieved for the Management of Gender Equality are defined in the managerial review for the integrated system (review of

direction). Top Management undertakes to satisfy the applicable requirements by verifying them as part of the Managerial Review so that Continuous Improvement is satisfied.

The Integrated Management System Policy is made public by publication on the Organization's website, made known to human resources by publication on the intranet, communicated on the virtual noticeboard of the Zucchetti platform, as well as communicated to the relevant interested parties as well as to Customers and Suppliers , as soon as the corresponding Certifications have been obtained.