Group Information Security Policy

Category	**Group Policy**	ID Document	**SCS-P01**	Legal Entity	**Namirial S.p.A.**
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PUBLIC INFORMATION SECURITY STATEMENT

Namirial Group (the "Group") is the organizational entity identified by the company Namirial S.p.A and its owned or controlled subsidiaries. Controlled subsidiary (the "Subsidiary") means any subsidiary of Namirial S.p.A, 50% or more of the outstanding equity interests of which are owned by Namirial S.p.A and its direct or indirect subsidiaries and of which the company possesses, directly or indirectly, the power to direct or cause the direction of the management or policies, whether through the ownership of voting equity interests, by agreement or otherwise.

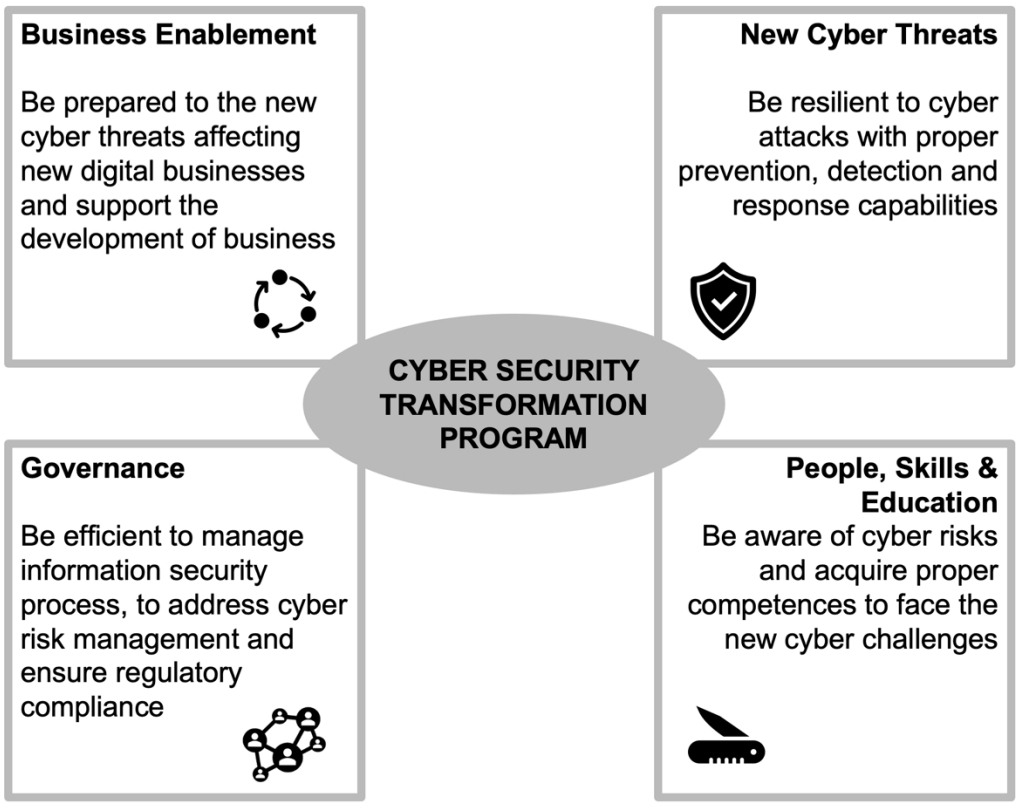
For us "Information Security" means to ensure that all information and information systems, on which the Group depends, including those related to customers, employees and our business partners data are adequately protected, guaranteeing the security of the company's services and the continuity of our business activities. The current context, characterized by the ongoing evolution of cyber threats and the more stringent regulations imparted by the authorities, presents several major challenges to businesses. We are committed to guaranteeing that the Group is constantly equipped with appropriate security systems, thus becoming increasingly more reliable for our stakeholders.

More specifically, we pledge to:

- protect the company's services and strengthen its security standards
- define internal security regulations and monitor their implementation
- define a solid management process for the IT risks
- ensure the implementation of security measures for the management of cyber threats
- raise awareness and understanding around the issue among all employees

We have therefore developed a strategy to continuously improve the Group's security level, in four key areas.

The Group has developed a long-term cyber security program to address the cyber security issues analyzed. This includes suitable countermeasures for specific situations. All projects defined and included in the program are regularly reviewed according to a schedule while the long-term strategy is reviewed annually.



To strengthen the security and the IT risk management, the Board of Directors has set up a steering committee specifically dedicated to defining and developing the security strategy of the Group as well as governing and monitoring the corporate IT risks. This committee, operating at group level, is named *Corporate Security & IT Risk Steering Committee* and its effective members are the CEO, CFO, CHRO, CTO and the CISO of Namirial S.p.A.

The cyber security program has been agreed upon by the Corporate Security & IT Risk Steering Committee.

We believe that the human factor is crucial to protect our information. In fact, we have developed a cyber security awareness program for all our employees in the form of periodical simulated phishing attacks and a miniseries of instructional videos. All the material is available on internal portals dedicated to employees. The episodes relate to specific information security areas, for example the smartphone and tablet security and social engineering.

The Group is continually adapting to the changing cybersecurity landscape and to stay ahead threats to our systems and applications. However, keeping our customer and employee information safe is not achieved by technology alone, it takes alert employees, customers and partners, who know how to recognize and report issues. For this reason, we allow our customers and partners to submit vulnerabilities and/or security events they may discover on any public-facing website or application owned, operated or controlled by the Group through a Responsible Disclosure Program.