

BUSINESS CONTINUITY MANAGEMENT SYSTEM POLICY

Business continuity is an issue that has always been under the attention of N&TS GROUP Networks & Transactional Systems Group S.p.A. and since 2021 the BCMS Top Management has decided to formalize and implement it through a business continuity management system (BCMS) certified with respect to the ISO 22301 standard with the aim of having greater control over the ability to offer products and services with a high availability profile, as defined by the indicators in the contractual conditions offered to customers, for the areas of software development and payment transaction processing services

The BCMS Top Management has therefore established that the objectives of the BCMS policy, for the two areas identified are:

- maintain operational continuity at a level that complies with the indicators that N&TS GROUP has set itself and contracts with its clients;
- maintaining BCMS certification;
- verifying the acceptability of risk levels;
- striving for continued improvement;
- prevent or reduce undesirable effects that can affect the achievement of objectives.

The objectives are subject to measurement, control and review by the BCMS Top Management on an annual or extraordinary basis, being punctually fixed at each update of this policy.

BCMS is integrated with ISMS (ISO/IEC 27001 extended with ISO/IEC 27017 and 27018), with the requirements of the PCI DSS standard and with the QMS (ISO 9001) and applies to all company functions defined in the organization chart and described in the "Company Job Description Chart".

All N&TS GROUP personnel and interested parties must contribute to the correct implementation of the Information Security Management System, each within the scope of their role.

In this context, the interested parties, internal and external to N&TS GROUP, are mainly:

1. The internal structure that manages the software applications and services, which includes employees of the Software Factory and Service Factory sectors of the N&TS GROUP operating offices
2. collaborators who provide services and support within the organization for the activities included in the scope of application;
3. Suppliers (companies and professionals) who provide products and/or services to complete the activities included in the scope of application (including the provision of services through data centers in Italy, Europe and the United States);
4. Clients to which are sold products and final services.

Considering the company operating procedures, collaborators who provide support to the activities included in the scope of application must comply with and apply the same safety rules and indications defined for employees, and are also linked to the procedures established for the management of relations with suppliers.

BCMS Top Management periodically verifies the state of BCMS implementation, effectiveness and adequacy.

Assago, 18-04-2023

BCMS Top Management: MD Enrico Febelli – CEO Elena Cossio