

INTEGRATED MANAGEMENT SYSTEM POLICY

With a view to promoting synergy between the various company management systems, HWG Sababa adopts an integrated company policy that covers aspects relating to:

- Quality (ISO 9001),
- Information security (ISO 27001),
- Service management (ISO 20000),
- Business continuity (ISO 22301),
- Guidelines for security incident management (ISO 27035),
- Guidelines for information security controls applied to cloud services (ISO 27017),
- Guidelines for the protection of personal data (ISO 27018),
- Environmental management (ISO 14001),
- Corruption prevention (ISO 37001).

To pursue these objectives, HWG Sababa has chosen to adopt an Integrated Management System based on the Risk-Based Thinking approach (risk and business context analysis). This approach is not designed as a stand-alone analysis, but as an integral part of the daily management of business processes and activities. It is a new vision that the Management intends to properly assimilate throughout the organization.

This Policy reflects this choice, integrating the various areas in which HWG Sababa is committed to constantly improving its performance for all its stakeholders. The goal is to build and consolidate relationships based on mutual trust, generating and sharing value with a view to continuity and harmonization of common interests.

In carrying out its activities, HWG Sababa is committed to:

1. Define and regularly update operational procedures that establish the methods for managing and controlling processes related to the Integrated Management System.
2. Provide for a preliminary analysis phase aimed at identifying internal and external factors that may influence the System, ensuring all stakeholders receive a structured risk assessment in relation to service delivery.
3. Adopt appropriate tools and indicators to monitor performance in the following areas: quality, information security, business continuity, security incident management, service management, environmental protection, and anti-bribery.
4. Implement activities to verify performance and results achieved in relation to certification standards, through continuous internal monitoring, with a view to ongoing improvement.
5. Promote motivation, responsibility, and awareness among personnel regarding the Integrated Management System, using appropriate communication tools and channels to foster continuous process improvement.
6. Enhance the company's information assets and expertise through continuous staff training, aimed at achieving the System's objectives.
7. Encourage the reporting of any critical issues in the application of the Integrated Management System, ensuring transparency of corrective actions taken in response to Policy guidelines.
8. Conduct periodic reviews and updates of objectives and procedures, through audit activities and reporting, in order to evaluate performance and revise the policy, objectives, and associated programs.
9. Keep the risk analysis updated, identifying potential threats that may impact HWG Sababa
10. Subject the Integrated Management System to periodic audits by an accredited third-party body recognized by ACCREDIA.

HWG Sababa encourages all Recipients to adopt and comply with the principles outlined in this Policy.

QUALITY MANAGEMENT SYSTEM

HWG Sababa implements a quality policy focused on achieving customer satisfaction, trust, and loyalty, as well as compliance with applicable regulations and laws, in order to achieve and maintain the following objectives:

- be a point of reference for customers in terms of the reliability of the products and services provided and compliance with service levels and delivery times;
- ensuring excellence in customer relations;
- guaranteeing the satisfaction of customers' expressed and implicit needs, as well as mandatory requirements.

The company's commitment to pursuing these objectives is demonstrated by the adoption, systematic implementation, verification, and continuous improvement of the Quality Management System in accordance with UNI EN ISO 9001:2015 standards.

INFORMATION SECURITY MANAGEMENT SYSTEM

Another primary objective pursued by HWG Sababa is the security and protection of the information and data entrusted to it by its customers, as well as the protection and reliability of the technological, physical, logical, and organizational structure responsible for data/information management.

To this end, HWG Sababa has decided to establish, implement, maintain, and continuously improve an information security management system that complies with ISO 27001, TISAX, European Regulation 2016/679, and Italian privacy legislation, enabling it to pursue the following macro-objectives:

- define appropriate levels of information confidentiality, including in the automotive sector, and guarantee them through processes and controls that enable the expected results agreed with customers to be achieved;
- ensure the integrity of information managed on behalf of customers through appropriate processes, methodologies, and controls;
- adopt, in agreement with customers, measures, processes, and controls that ensure the availability of the information they expect;
- constantly assess the risks to the security of information present in the processes of providing services to customers and take the necessary actions;
- implement the most appropriate actions to ensure that the resources involved have the appropriate skills and awareness of information security.

This policy represents the ethical and fundamental commitment that HWG Sababa makes to customers and third parties at every stage of its relationships and in the provision of its services and products.

CODE OF PRACTICE ISO 27035

In order to ensure a rapid response to information security incidents, HWG Sababa S.r.l. has decided to align itself with the system defined by the ISO/IEC 27035-1 standard, achieving the following objectives:

- planning and preparing for the management of information security incidents;
- detect, report, and assess information security incidents and the vulnerabilities involved in the incident;
- respond to information security incidents, including the activation of appropriate controls to prevent, reduce, and recover from the impact;
- appropriately manage reported information security vulnerabilities involved in the incident;
- learn from information security incidents and vulnerabilities involved in the incident, implement and verify preventive controls, and make improvements to the overall approach to information security incident management.

CODE OF PRACTICE ISO 27017 E ISO 27018

HWG Sababa has also adapted its processes for the optimal management of its IT services for information security, extending to ISO/IEC 27017 and ISO/IEC 27018 with regard to the protection of information relating to the provision of IT security services and cloud computing services.

This requirement arises from the need to respond to multiple requests from outside and inside the organization, including the need to comply with the provisions of the GDPR regarding the protection of personal data of customers and employees.

In the area of cloud services, HWG Sababa ensures that:

- information security requirements are adopted as the basis for the design and implementation of the cloud service.
- risks arising from authorized personnel are defined.
- multi-tenancy and isolation of the cloud service customer (including virtualization) are established.
- access to cloud service customer resources by HWG Sababa personnel is ensured;
- access control procedures are ensured, including strong authentication for administrative access to cloud services;
- any changes to cloud service customers during their management are communicated;
- virtualization security is adopted;
- access to and protection of cloud service customer data is guaranteed;
- the lifecycle of cloud service customer accounts is managed;
- any breaches and guidelines for sharing information to support investigations are communicated.

With reference to its customers HWG Sababa, pursuant to ISO/IEC 27018:2020 and in accordance with Regulation (EU) 2016/679, acts as Data Controller or Data Processor, declaring its respective status and the related obligations arising therefrom in the contracts signed and in the appointments as data processor that HWG Sababa provides for with its suppliers for the performance of processing activities.

To this end, HWG Sababa pays care and attention to:

- the correct identification of the data subjects whose personal data it processes;
- the accuracy of the personal data it obtains;
- the lawfulness of the processing it carries out on such data;
- the careful identification, assessment, and management of all risks associated with the various processing operations carried out, with the possible performance of impact assessments (DPIA), if necessary;
- the adoption of appropriate technical and organizational measures (suitable processes, tools, and controls) to ensure, and be able to demonstrate, that all processing is carried out in accordance with current legislation on the protection of personal data;
- the adoption of “privacy by design” and “privacy by default” criteria and methods for full compliance with regulatory requirements;
- the identification of the responsibilities and authorities involved in the management of personal data processed, including the relevant appointments of DPOs (Data Protection Officers), Data Processors, and System Administrators.

SERVICE MANAGEMENT SYSTEM

HWG Sababa has also decided to align itself with the system outlined by the ISO/IEC 20000 standard, with a view to defining a service management system and complying with requirements that enable the planning, design, transition, delivery, and improvement of services, as well as to increase trust in its dealings with customers, partners, and all stakeholders.

In support of its strategy, it has implemented and operates an ISO/IEC 20000 Management System that enables it to achieve the following objectives:

- establish periodic management reviews with the aim of assessing and improving company performance with respect to certain quality indicators;
- identify and implement any corrective actions that may be necessary to reduce the incidence of abnormal conditions on the overall functioning of the system to acceptable levels and to maintain residual risk at acceptable levels;



- ensure customer satisfaction by offering and ensuring the provision of a reliable, high-quality service;
- ensure the continuity of the business and the services offered;
- ensure the management and monitoring of the parties involved in the provision of services, through appropriate contractual formalization, as well as through communication, performance analysis, and the management of relationships with customers and any third parties;
- establish and maintain transparent and fair relationships with suppliers that bring mutual benefits.

In addition, HWG Sababa ensures continuity of service to its customers, even in cases of major difficulty, and requires the same commitment from its stakeholders.

BUSINESS CONTINUITY MANAGEMENT SYSTEM

HWG Sababa undertakes – in accordance with ISO 22301 – to pursue business continuity objectives in a systematic and planned manner through, for example, the establishment of a Crisis Management Committee and the definition of recovery point objectives (RPO; the time required to recover information used by a business to enable it to recover) and recovery time objectives (RTO; the period of time after an incident within which the product, service, or business must be restored).

In this way, HWG Sababa intends to:

- manage crisis situations adequately and promptly, minimizing their impact on the business (its own and that of its stakeholders), ensuring a rapid return to normal business operations;
- comply with the constraints deriving from current regulations and contractual obligations, continuously increasing its reliability;
- set up an Integrated Management System, including a Business Continuity procedure, which proves to be effective in its practical application.

ENVIRONMENTAL MANAGEMENT SYSTEM

The following are the principles adopted by HWG Sababa in order to minimize environmental impact as defined in accordance with ISO 14001:

- comply with technical and legislative provisions and standards relating to environmental issues based on the principle of risk prevention and mitigation, including those related to climate change;
- monitor its activities with a view to continuous improvement, environmental protection, and pollution reduction and prevention;
- take appropriate measures to prevent waste of energy and natural and energy resources;
- pursue the minimization and proper management of waste produced;
- pursue the minimization of emissions into the atmosphere, understood as tons of CO₂ equivalent;
- promote the use of IT tools by encouraging the use of virtual internal and external communication systems
- educate and raise awareness, through training and refresher courses, of all internal employees, in relation to the tasks they perform, the importance of processes and the effect of results on customers and the environment, so that they operate responsibly and consciously.

ANTI-CORRUPTION MANAGEMENT SYSTEM

Specifically with regard to anti-corruption issues, HWG Sababa undertakes to carry out its activities in accordance with UNI ISO 37001:2016 by adopting the following principles:

- defines appropriate measures to pursue the principles of conducting its business in compliance with the law and with integrity, transparency, and fairness in all countries in which it operates;
- it applies all the procedures necessary to verify compliance with this Policy, the Code of Ethics, and applicable Anti-Corruption Laws, and subjects the content of its Anti-Corruption System to constant review and monitoring;
- prohibits all forms of corruption, in any form or manner, in any jurisdiction, involving not only public officials but also private individuals;



- undertakes to accurately account for all transactions, in accordance with accounting principles, in a complete and transparent manner in order to be able to track all receipts, payments, and transactions in general.

HWG Sababa also undertakes to pursue the continuous improvement of its Management Systems.

Any employee or collaborator who fails to act in accordance with this Policy will be subject to disciplinary action commensurate with the seriousness of the violation. Any partner or supplier who fails to act in accordance with this Policy will be subject to contractual disciplinary sanctions.

If you have any questions regarding this Policy or the laws and regulations mentioned herein, please contact: compliance@hwgsababa.com or call +39 045 4932800.

