

# Quality Policy

## 1. QUALITY MANAGEMENT SYSTEM OF IMPRESOFT GROUP

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Impresoft Group arises from the union of several innovative and complementary companies with the aim of guiding businesses through the digital transformation process. The Group consists of a network model of companies organized into 4 Competence Centers, whose synergies generated by these integrations, combined with the mix of talents, skills, solutions, and highly diversified services, aim to meet all the technological innovation needs of customers.

Impresoft Group actively contributes to the global strategy and a technological revolution capable of creating a sustainable future. For Impresoft Group, digital transformation cannot ignore sustainability, necessary to improve environmental, economic, and social spheres. For this reason, it is committed to implementing a development strategy that ensures Corporate Social Responsibility, pursuing goals in favor of the Environment and People, as well as Profit.

To ensure a continuous response to the needs expressed by its customers, as well as the enhancement of people and the context in which they operate, Impresoft Group is oriented towards a well-structured organization through the implementation of the Quality Management System compliant with ISO 9001:2015, ensuring continuous improvement of all business processes with particular attention to those of a more innovative nature, committing to adopting new additional certifications qualifying in terms of business.

## 2. Integrated Management System

**Upgrade** and **QINET** are born with the purpose of bringing a new vision of Corporate Resilience to all companies that not only wish to address change but also embrace and make it their own. Every day, we help our clients realize a new way of living and working, thanks to the passion and skills acquired in 30 years of experience, during which we have helped companies operating in multiple sectors achieve their goals, with the best and most innovative technologies available. We operate with an integrated approach in the most important IT areas: Cloud Operation, IT Governance, NOC, SOC, Cyber Security, Managed Services. The road to the future is made up of changes that need to be anticipated and managed. Today's businesses have a great opportunity: they can rethink how they operate, change perspective, review dynamics, and cater to markets that become increasingly dynamic and competitive every day. At Upgrade and QINET, we work to make this path possible.

The control system and our continuous commitment will enable:

- STANDARDIZATION OF QUALITY LEVELS
- COST REDUCTION
- INCREASED COMPETITIVENESS
- MAXIMUM COMPLIANCE WITH REGULATORY REQUIREMENTS AND PERIODIC UPDATES ON CURRENT REGULATIONS
- CONSTANT CONTINUOUS IMPROVEMENT OF THE QUALITY MANAGEMENT SYSTEM
- CONSTANT REVIEW OF QUALITY POLICY TAKING INTO ACCOUNT BUSINESS CHANGES
- IMPROVEMENT OF COMPANY IMAGE.

To be effective, it is essential to share common values that represent the identity of Upgrade and QINET and naturally inspire the behaviors of all members of the organization. Full adherence to them constitutes, for all of us, a goal to be achieved, through daily behaviors at both individual and group levels.

### 1.2 Our Values Towards External Parties

#### 1.1.1 Customer Centricity

We believe that the key to success in a highly competitive environment is customer satisfaction. The customer will be our main reference point in making business decisions, whether they are strategic or operational. We listen to our customers and commit to meeting their needs and expectations, clearly and precisely identifying the requirements of the solutions to be provided and the services to be delivered. We operate in business relationships with a partnership perspective, based on keeping the commitments made, the concreteness of trusted relationships, and the achievement of common benefits.

Satisfying the customer is a challenge. Needs are constantly changing, and it is a precise corporate responsibility to understand them, guide them, and respond to them concretely, but also to anticipate them by adopting a data-driven approach.

### **1.1.2 Loyalty, Seriousness, and Honesty**

We work with companies and individuals according to the highest ethical standards.

### **1.1.3 Compliance with Regulatory Requirements and Timely Updates**

We proactively identify any new or modified regulatory requirements, assessing their applicability and taking appropriate actions to ensure our organization's compliance with current regulations, with particular emphasis on those in the medical sector. We hold utmost regard for adhering to conformity assessment procedures and the management processes and resources required to implement the necessary principles and actions to achieve legislative compliance.

### **1.1.4 Corporate Identity**

We aspire to be recognized by all our stakeholders as a solid, reliable, and cohesive organization. We will work diligently to consolidate these characteristics.

### **1.1.5 Pursuing Excellence**

Every day, we strive to exceed our customers' expectations by delivering our utmost according to our talents. Aware that pursuing excellence is an endless goal, we understand that, in doing so, we leave a better world for those who follow.

### **1.1.6 Passion for Innovation**

A secure, reliable, and always available technological ecosystem, based on solid and innovative infrastructures and applications, is essential for all companies aiming to dominate markets. Technology becomes a true driver of new business models, capable of empowering and differentiating in the market.

## **1.2 OUR VALUES TOWARDS INTERNAL PARTIES**

### **1.2.1 Results Orientation**

We aim for decisions, actions, and behaviors of all individuals to be directed towards business profitability and cost reduction. This involves achieving defined results with the contribution of everyone, where each assumes responsibility for their role and dedicates personal commitment to the continuous improvement process, according to their attributions and skills.

### **1.2.2 Team Spirit and Diversity as Value**

We strive to safeguard and develop a sense of belonging to the company through teamwork and mutual collaboration. The true engine of the company is those who contribute every day to realize its vision. Developing a collaborative digital workplace, facilitating sharing, collaboration, and productivity regardless of location and time, is a distinctive trait of resilient organizations.

### **1.2.3 Service Orientation**

Every activity is part of a process, and every process has a customer. Our colleagues are customers, and therefore, resources to be respected and valued.

#### **1.2.4 Change-Ready - Open to Challenges**

Upgrade and QINET are and must remain organizations that continuously learn, valuing resources that embrace change as their daily challenge. In increasingly complex companies, disruption can strike at any time. Regardless of the cause, whether external or internal to the organization, resilience means responding to change without interrupting or conditioning operations.

#### **1.2.5 Confidentiality**

The activities of Upgrade and QINET may require the acquisition, retention, and processing of information, data, and documents that cannot be disclosed to outsiders, or whose improper or untimely disclosure could harm the company's interests. For this reason, all those who collaborate with Upgrade and QINET are required to protect the information they come into contact with during their professional activities and to avoid any misuse.

#### **1.2.6 Human Resources**

Human resources represent the cornerstone of Upgrade and QINET's development. For this reason, the company promotes the development of internal skills and careful selection of external collaborations, involving and sensitizing its workers to promote and stimulate resource development and growth, to maximize everyone's capabilities. Everyone's behavior must ensure the enhancement of human capital as a distinctive element of our organization. Any productive, commercial, or behavioral decision or attitude should be taken as if the company were one's own; only then can we become a group oriented towards excellence.

# Information Security Policy

## 3. QUALITY MANAGEMENT SYSTEM OF IMPRESOFT GROUP

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Impresoft Group arises from the merger of multiple innovative and complementary companies with the aim of guiding businesses through the process of digital transformation. The Group operates on a network model of companies organized into 4 Competence Centers. The synergies generated by these integrations, along with the combination of talents, skills, diverse solutions, and services, are aimed at meeting all the technological innovation needs of clients.

Impresoft Group actively contributes to the global strategy and technological revolution capable of creating a sustainable future. For Impresoft Group, digital transformation cannot ignore sustainability, necessary for improving environmental, economic, and social spheres. Therefore, it is committed to implementing a development strategy that ensures Corporate Social Responsibility, pursuing objectives in favor of the Environment and People, as well as Profit.

To ensure a continuous response to the needs expressed by its customers, as well as the enhancement of individuals and the context in which they operate, Impresoft Group is oriented towards a well-structured organization through the implementation of a Quality Management System compliant with ISO 9001:2015 standards, guaranteeing continuous improvement of all business processes with particular attention to those of a more innovative nature, and committing to the adoption of new additional certifications qualifying in terms of business.

## 4. UPGRADE & QINET

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### 1.3 INFORMATION SECURITY POLICY STATEMENT

**Upgrade** and **QINET** recognize that information security is a critical success factor both in the design and development of technological solutions and in the provision of services to customers. For **Upgrade** and **QINET**, Information Security Management aims primarily to protect data and information in order to safeguard the assets represented by corporate knowledge, that of our clients, and simultaneously protect the individuals whose personal data is processed.

Due to the nature of the products and services offered by **Upgrade** and **QINET** to its customers and the value represented by information in its business, Information Security Policy represents a fundamental and priority strategic direction.

For **Upgrade** and **QINET**, the information security policy consists of a set of processes that include the identification of critical areas, the identification and management of risks related to software and hardware systems, the management of vulnerabilities and incidents, access control, and the management of privacy and compliance.

All persons working and/or collaborating with **Upgrade** and **QINET** are required to share and respect the following foundational principles regarding information security:

- **Confidentiality:** Information must be accessible only to authorized individuals and/or processes and must not be made available or disclosed to unauthorized persons or entities.
- **Integrity:** Safeguarding the consistency of information from unauthorized changes must be ensured so that information does not undergo modifications or deletions due to errors or deliberate actions, as well as due to malfunctions or damage to technological systems.
- **Availability:** Ensuring authorized users' access to information and associated architectural elements, when requested, to safeguard information assets with guaranteed access, usability, and confidentiality, reducing the risks associated with unauthorized data access (intrusions, data theft, etc.).
- **Control:** Data management must always take place through secure and tested processes and tools.
- **Authenticity:** A reliable source of information must always be guaranteed.
- **Respect for Privacy:** Applicable legislation on personal data processing must always be respected.

## 1.4 OBJECTIVES FOR INFORMATION SECURITY

The Information Security Management System of Upgrade and QINET has the following main objectives:

1. Ensure complete awareness of the information managed and evaluate its criticality to facilitate the implementation of adequate protection levels.
2. Ensure secure access to information to prevent unauthorized or improperly processed treatments.
3. Ensure that all internal functions of the organization and stakeholders are fully aware of security issues and collaborate by adopting procedures aimed at respecting adequate security levels.
4. Ensure that anomalies and incidents affecting the System and security levels are promptly recognized and correctly managed through efficient prevention, communication, and reaction systems to minimize their impacts.
5. Ensure that access to the premises and premises of the Unit occurs exclusively by authorized personnel, guaranteeing the security of the areas and assets present.
6. **Ensure compliance with legal requirements, requirements established with stakeholders, and other applicable requirements related to information security.**
7. Ensure the timely detection of abnormal events, incidents, and vulnerabilities of information systems in order to respect the security and availability of services and information.
8. Ensure business continuity and disaster recovery through the application of established security procedures.

## 1.5 COMMITMENT STATEMENT

In applying the Policy to achieve the Objectives for Information Security, **Upgrade** and **QINET** are committed to:

- Adopting an Information Security Management System compliant with the requirements specified by ISO/IEC 27001:2017.
- Constantly monitoring the degree of compliance of the System with applicable laws and regulations, both mandatory and voluntary, in addition to the relevant contractual obligations within the scope of the Information Security Management System.
- Ensuring adequate means and resources for its maintenance and continuous improvement.
- Making all personnel within the organization aware of everyone's obligations and responsibilities in managing information security and the consequences in case of events, both intentional and negligent, related to unauthorized use, modification, or destruction of critical information.
- Collaborating with qualified and high-level technological partners, suitable for the needs and whose reliability is guaranteed over time, in order to securely handle our information assets.
- Fully respecting the Service Level Agreements (SLAs) established with customers, in **order** to always pursue maximum satisfaction.

## 1.6 SCOPE OF APPLICATION

The information security policy applies to the processes, infrastructures, and personnel of Upgrade and QINET operating at the locations listed below. It therefore applies to all functions involved in the design, implementation, and provision of our products and services, as well as to stakeholders collaborating with **Upgrade** and **QINET** in information management.

- Strada Statale 36 km 3610 - 23846 Garbagnate Monastero (LC)
- Via San Clemente, 53 – 24036 Ponte San Pietro (BG)
- Via Buccari, 29 – 16153 Genova (GE)
- Via Torino, 166 – 10093 Collegno (TO)

## 1.7 COMMUNICATION AND SHARING

This Policy is communicated within the organization by publication on the company's intranet and made available to stakeholders through publication on the company's website [www.upgradesrl.co](http://www.upgradesrl.co) and [www.qinet.it](http://www.qinet.it).

Gargbagnate Monastero, 11/03/2024

**The management**