

## Quality and Information Security Policy

CDLAN SpA has been operating in the ICT sector for over twenty years, establishing itself as a national benchmark for the technological excellence of its solutions and its strongly customer-focused approach.

As a *Benefit Corporation*, CDLAN implements policies aimed at minimizing the environmental and social impact of its operations.

Since 2024, following the acquisition of Shelli Srl, based in Trescore Balneario, the company has been operating as a Group.

CDLAN SpA has been identified as an *Essential Entity* under the NIS2 Directive.

Meeting regulatory requirements and ensuring the continuous improvement of the effectiveness of the Integrated Management System for Quality and Information Security—together with achieving full Customer satisfaction—are fundamental priorities for CDLAN SpA. These commitments enable the company to deliver high-quality services and ensure strong protection of its own information assets, as well as those of its customers and stakeholders. CDLAN considers these aspects to be strategic levers for competitive advantage and key assets of the organization.

CDLAN SpA defines the following objectives:

1. Implement policies that foster awareness, ethical behavior, and individual commitment, with a firm belief in the essential role of every person;
2. Understand customer needs in order to anticipate their expectations;
3. Deliver the highest possible performance levels while always ensuring compliance with applicable requirements;
4. Confidentiality: information is accessible only to duly authorized individuals and/or processes;
5. Integrity: safeguarding the consistency of information against unauthorized modifications;
6. Availability: ensuring that data management processes and tools are secure, reliable, and regularly tested;
7. Authenticity: ensuring the trustworthy origin of information;
8. Privacy: ensuring full protection and control of personal data.

To achieve these objectives, CDLAN operates according to the following principles, as outlined in its *Code of Ethics* approved in 2023:

1. Employee involvement: CDLAN SpA recognizes that people are the essence of the organization, and their active participation enables the highest quality of service;

2. Clear definition of roles and responsibilities: CDLAN SpA clearly defines the duties and responsibilities of each role and individual;
3. Process-based approach: CDLAN SpA promotes a process-oriented approach to achieve desired results with greater efficiency;
4. Continuous improvement: the organization is committed to the ongoing improvement of its Integrated Management System. The framework adopted to achieve this goal is the Quality and Information Security Management System compliant with UNI EN ISO 9001 and ISO/IEC 27001 standards (including the ISO/IEC 27017 and ISO/IEC 27018 extensions);
5. Fairness and transparency in supplier relationships: CDLAN SpA and its suppliers are interdependent partners, and mutually beneficial relationships enhance both parties' ability to create value.

Accordingly, CDLAN SpA—through the contribution of all its staff, each within their role—commits to:

- periodically reviewing contextual factors and stakeholder requirements, identifying and evaluating risks and opportunities for improvement;
- maintaining continuous engagement with customers to measure satisfaction, anticipate needs, and provide high-quality, innovative services;
- constantly monitoring internal processes and procedures to achieve the highest levels of efficiency and effectiveness;
- ensuring the integrity, confidentiality, and availability of data by protecting it from threats such as unauthorized access, alteration, or theft;
- preventing interruptions to critical services caused by malfunctions, failures, or disasters through a structured and systematic Business Continuity approach;
- promoting employee growth, motivation, and engagement to foster awareness, responsibility, and participation in strategic and organizational decisions;
- ensuring that all personnel are adequately informed and trained to work safely and effectively;
- reinforcing accountability in the handling of data, in full compliance with privacy and information security regulations, by providing appropriate instructions and verifying their understanding and application;
- ensuring compliance with corporate procedures, instructions, policies, and directives, as well as full adherence to applicable laws and regulations;
- requiring all third-party suppliers and partners providing support services to adhere to CDLAN's Quality and Information Security standards.

Milano, September 2025