Information Security Policy

This document aims to define PSE's Information Security Policy, outlining its objectives and the commitments arising from it.

The general objectives of the Information Security Management System (ISMS) are as follows:

- To establish and implement an ISMS in compliance with all applicable laws, regulations, and mandatory standards, as well as the maturity frameworks to which the company has chosen to adhere or that are required by Clients;
- To build and continuously enhance a positive market image and ensure "business continuity" for Clients, minimizing the risk of disruptions caused by potential information security incidents;
- To reduce damages resulting from potential security incidents.

These objectives are aligned with the company's business goals, strategy, and organizational plans.

The aim is to refine procedures that enable the organization to operate more efficiently, enhance control and security over its activities, and achieve increasingly ambitious objectives.
PSE provides products based on various resources, including information. The use of information resources must comply with good practices and working procedures, as well as legal, regulatory, and contractual requirements, ensuring the **confidentiality**, **integrity** and **availability** of all PSE's and its Clients' information assets.
Information is a highly valuable asset for PSE, enabling the company to fulfill its functions and business obligations to third parties. Therefore, the ISMS ensures that the organization complies with all legal, regulatory, and contractual information security requirements, including those stipulated by data protection laws (EU Regulation 2016/679, Legislative Decree 101/2018, and Legislative Decree 196/2003) and by the Italian Data Protection Authority.
Specifically, within the ISMS:

- The approach will be risk-based, in accordance with ISO/IEC 27001:2022 and best practices;
- Procedures will define risk assessment criteria aligned with PSE's current strategic risk management policies;
- The organization will adopt appropriate information transfer systems and tools to preserve the **integrity**, **confidentiality** and **availability** of the information.

It is the clear intention and responsibility of Management to strengthen internal awareness regarding increasingly challenging information security objectives, enhance the company's image and reputation—especially through transparency toward Clients, recognized professionalism, and a distinctive, personalized style.
PSE is therefore firmly committed to implementing and adhering to this Information Security Policy, ensuring its application at all organizational levels. The company is also committed to training its personnel accordingly.

This Policy represents the commitment upon which the ISMS is founded.

- All business processes (both core and support) are subject to the guidelines and directives defined in this document.
- All relevant stakeholders are required to adopt appropriate security measures in line with the principles of this Policy.
- Failure to comply with or violation of the principles outlined in this Policy may result in disciplinary action under the applicable National Collective Labor Agreement (CCNL) for employees, and in civil and criminal proceedings, or in the revision and potential termination of contractual relationships for external parties.
- Management assigns to the ISMS Manager (RSGSI) the responsibility of ensuring the implementation of the ISMS and keeping Management informed of the results of periodic audits.
- Management will periodically review the company's practices, policies, and guidelines during Management Review meetings, recommending modifications or improvements to ensure the effective implementation of appropriate security measures.
- This Policy is a controlled document, available in read-only format to employees on the internal server, and accessible to all stakeholders via the company's website. The ISMS Manager is responsible for disseminating updates and ensuring that outdated copies are removed or archived.

Together with this Policy, PSE has developed specific policies covering additional topics.
Please refer to document "1.1.1 - 02 - PSE - Additional Information Security Policies" for details.

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Management – PSE