

Integrated Management System Policy Document



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Introduction

Creval chose to adopt and maintain an Integrated Quality, Environment and Information Security Management System certified according to the **UNI EN ISO 9001:2015**, **UNI EN ISO 14001:2015** and **ISO/IEC 27001:2013** standards, considering it an important tool concretely related to the company business: **a real added value for the organisation able to generate economic returns and in terms of excellence and reputation towards the outside.**

The decision to integrate the Quality System with the Environmental Management System and the Information Security Management System derives

- from the organisation's strong environmental awareness;
- from the essential need to protect information resources (internal and offered to customers) from all threats, whether organisational or technological, internal or external, accidental or intentional.

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GENERAL PRINCIPLES

that Creval undertakes to comply with:

- ✓ provide **consistently** high quality services, responding and **reacting promptly** to internal and external changes, including when faced with unforeseeable and prolonged emergency events;
- ✓ guaranteeing **Business Continuity** through the adoption of adequate levels of infrastructure redundancy, data security, application control and change processes;
- ✓ identify the current and future **requirements and expectations** of the various interested parties, **ensuring they are fully met**;
- ✓ make sure that employees, customers and all affected parties receive continued **protection and support** even in emergency situations;
- ✓ prevent and minimise **health and safety risks for workers**;
- ✓ treat customers with **compassion and courtesy** at all times, especially **families and small/medium enterprises** in our local areas, as declared in the company's mission statement;
- ✓ strive for **quality, innovation** and **digitalisation** in our customer relationships, while upholding the highest privacy and data protection standards;
- ✓ demonstrate **transparency** and **integrity** towards stakeholders of all types, ensuring the protection of human rights as defined in the Group Code of Conduct;
- ✓ guaranteeing internal efficiency by enhancing the value of **human resources** through the continuous improvement of skills, motivating and raising the awareness of all employees and ensuring maximum satisfaction;
- ✓ basing the Integrated Management System on a **process** approach integrated by an approach based on the ability to manage **risks** and seize **opportunities**;
- ✓ prepare **suitable management and organisational models** which can handle the complexity that arises from emergency situations;
- ✓ carrying out a suitable and complete **risk analysis** in order to understand vulnerabilities and opportunities, assess possible threats, prepare the necessary countermeasures and anticipate evolutionary trends;

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GENERAL PRINCIPLES that Creval undertakes to comply with:

- ✓ ensuring observance of **compliance obligations** and all legal and regulatory requirements applicable to the activities carried out;
- ✓ ensuring the **continuous improvement** of the Integrated Management System in order to **increase services**;
- ✓ keeping track of and studying any **incidents, anomalies, non-conformities and/or complaints** (real or alleged) by taking the required appropriate corrective measures;
- ✓ assessing and monitoring the **adequacy** of the organisation with respect to both the regulations and the expectations agreed with stakeholders, as well as the added value achieved and perceived through the generation of the main tangible and intangible elements made available to the company itself and to the Ecosystem;
- ✓ ensure **integrity** in our company works and the **fight against corruption**;
- ✓ promoting the **guidance** and **responsibility** of **employees** at all levels towards the Integrated Quality, Environment and Information Security Management System through the implementation of information and training programmes for personnel;
- ✓ encouraging the full implementation of the **Charter of Values** of the Credito Valtellinese Group in order to ensure compliance with all the main principles on which it is based: **responsibility, professionalism, sense of belonging, innovation and sustainability**;
- ✓ foster the creation of **Sustainable Value**;
- ✓ turning to **suppliers** of products and services of proven reliability and professionalism, spreading the culture of Quality, respect for the Environment and the safety of information assets;
- ✓ increasing confidence in the company's activity, **the environmental culture and the security of information for the interested parties** (resources, partners, citizens, public bodies, suppliers, customers...);
- ✓ enhance and amplify the company's visibility through the use of **social networks**, including on issues relating to environmental protection and data security.

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GENERAL PRINCIPLES that Creval undertakes to comply with:

Creval intends to reduce its **ECOLOGICAL FOOTPRINT** through a policy aimed at consuming in a more critical and sustainable way; in particular, it undertakes to:

- ✓ maintain a high level of attention to the principles of **sustainability and environmental protection**;
- ✓ analyse the **environmental aspects** and their **impacts**, starting from strict compliance with the regulations in force;
- ✓ optimise **energy** supply and consumption;
- ✓ utilise **energy carrier** supply predominantly from **renewable sources**;
- ✓ avoid waste by reducing the use of **toner** and **paper**, favouring **recycled** paper and encouraging **dematerialisation**;
- ✓ use **smarter and more sustainable mobility systems** by using ICT technologies and investing in a modern and efficient car fleet;
- ✓ reduce the amount of **waste** produced by making a separate collection increasingly driven to promote its **recycling**;
- ✓ monitor and optimise the environmental performance of real estate assets in order to **minimise emissions into the atmosphere, soil and subsoil, noise and consumption of natural resources**;
- ✓ continue to pay attention to **purchasing policies** that refer to the principles of environmental sustainability;
- ✓ assess in advance the possible environmental effects of new activities or processes, adopting operational measures with **a lower environmental impact**.

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PRINCIPLES FOR PROTECTING INFORMATION that Creval undertakes to comply with:

Creval intends to **protect its information assets** through a policy based on the principles of safeguarding information in all areas of the company; in particular, it undertakes to:

- ✓ adopt an organisational **model for information security** so that the entire organisation can proactively share initiatives and projects in a logic of security by design;
- ✓ **protect IT assets** (data, hardware, software, etc.) from the moment they are created/installed, during their use, until they are deleted/disposed of;
- ✓ guarantee the **confidentiality** that must be considered by all users, internal and external (collaborators, customers and/or suppliers) of the Group, as an integral component of daily activities aimed at protecting information and systems from tampering, improper use and destruction;
- ✓ guarantee the security of the information system, which must be considered by all users of the services offered, whether they are internal to the Group or external (collaborators, customers and/or suppliers), as an integral component of daily activity, aimed at **protecting information and equipment from tampering, improper use or destruction**;
- ✓ protect the **confidentiality, integrity, availability and conformity of the information** produced, collected or otherwise processed, from any intentional or accidental threat, internal or external;
- ✓ ensure the **principle of minimum privileges**, which allows access only to information relevant to the carrying-out of the tasks assigned and with the lowest possible level of authorisation;
- ✓ **train the personnel** in information security;
- ✓ ensure the **separation of the operating, authorisation and control functions**;
- ✓ guarantee the protection of **Privacy**.

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Commitment of the Top Management

Top Management is personally involved in the respect and implementation of these principles and undertakes to ensure that this Policy is **understood, shared, implemented and carried out** by all its employees and collaborators and at the same time undertakes to **share it** with all stakeholders.

Considering the achievement of the set objectives of fundamental importance, the **Integrated Quality Management System is constantly monitored**. The company strategies deriving from the above principles are set out in periodic **Strategic and Operating Plans**.

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