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JACOBACCI & PARTNERS

INFORMATION SECURITY POLICY

1 Purpose and scope of application

These policies, rules, and procedures apply to all data, information systems, activities, and resources owned, leased, controlled, or used by Jacobacci & Partners Spa, as well as by its agents, contractors, or other business partners on behalf of Jacobacci & Partners Spa.

They apply to all employees, contractors, subcontractors, and their respective facilities that support Jacobacci & Partners Spa's business operations, wherever Jacobacci & Partners Spa data is stored or processed, including third parties designated by Jacobacci & Partners Spa to manage, process, transmit, store, or delete such data.

Some policies make explicit reference to individuals with specific job functions (e.g., system administrators); otherwise, all personnel must comply with the policies.

Jacobacci & Partners Spa reserves the right to revoke, modify, or supplement policies, procedures, standards, and guidelines at any time without prior notice. Such changes will take effect immediately upon management approval, unless otherwise indicated.

2 Management System Objectives

The objectives of the adopted management system can be summarized as follows:

- Ensure compliance with applicable legislative, regulatory, and contractual requirements.
- Integrate information security into business process management.
- Engage employees actively through training and awareness programs.

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- Analyse and continuously assess risks and opportunities related to information security, defining and implementing adequate security measures to reduce risks to an acceptable level.
- Develop and implement processes, policies, and procedures for managing information security in the use of IT systems, human resources, physical infrastructure, and in the selection and safeguarding of information security within supply chains.
- Develop secure practices, processes, technologies and tools on a continuous basis.
- Monitor anomalies and manage security incidents within timelines consistent with regulatory and contractual constraints.
- Integrate information security aspects into business continuity management.
- Monitor results and commit to the continuous improvement of the performance and effectiveness of the Information Security Management System.