TAS group
GENERAL POLICIES

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1. Introduction

TAS group is specialized in software solutions for **e-money**, payments, **financial markets** and **systems for the Extended Enterprise**, **leader in Italy** in **card management** systems, **access to payment networks** and **management of stock exchange orders.**

TAS group provides services to the **most important commercial and central banks in Italy and Europe**, to **the major financial service centers** and to some of **the main global broker dealers** in the Fortune Global 500 ranking.
Operating through its subsidiaries, TAS group proposes itself as a first-level partner also on the **international market.**

Thanks to the diversification path started in recent years, TAS group solutions are adopted by **the Public Administration** (Ministries, Regions and other Local Authorities) and by **non-banking companies** in different sectors.

In relation to the reference market and the products/services offered, it is strategic for TAS group to be able to guarantee high standards both in terms of quality and in relation to the security of data and information processed, compliance with current legislation on privacy and the management of business continuity.
For this reason, an integrated management system has been developed whose principles refer to international standards, including:

- UNI EN ISO 9001:2015 Quality management systems
- UNI CEI EN ISO/IEC 27001:2017 Information security management systems
- ISO/IEC 27002:2022 Information security, cybersecurity and privacy protection-Information security controls
- ISO/IEC 27017:2015 Code of practice for information security controls based on ISO/IEC 27002 for cloud services
- ISO/IEC 27018:2019 Code of practice for protection of personally identifiable information (PII) in public clouds acting as PII processors
- ISO 22301:2019 Security and resilience- Business continuity management systems
- UNI ISO 31000:2018 Risk management – guidelines
- UNI / PdR 125:2022 Guidelines for the management system for gender equality

TAS group is also strongly aware of the importance of ethical, social and environmental issues and has adopted a Code of Ethics to which all group companies adhere.
This document collects the general policies of TAS group in relation to quality, data and information security, personal data management and privacy, business continuity, ethics, social, environment and safety at work.

2. Quality policy

The basic principles on which the group quality policy is based are:
- the enhancement of innovation capacity, investing both in the renewal of the range of products and services offered and in strategic professional skills,
- the result orientation,
- the consolidation of the Italian market and the development of foreign markets thanks to relations with the group's subsidiaries and new partnerships,
- constant monitoring of the degree of customer satisfaction and loyalty,
- the optimization of business processes with the involvement, awareness and active contribution of all areas,
- the improvement of the skills and involvement of employees, encouraging the participation and sharing of Quality objectives through training, training, supervision and effective communication,
- always operate in full respect of ethics towards Customers, Suppliers and Employees.

The Executive Team undertakes, with the constant support of the Chairman and CEO & GM, to:
- promote and support a quality-oriented way of working with all staff at all levels of responsibility,
- encourage respect, development and continuous improvement of the Integrated System.
- guarantee to its customers the maximum effort put in the identification and satisfaction of the needs and applicable requirements, both in relation to the software solutions provided and to the services provided;
- collecting and assessing internal and external stakeholder's expectations, translating them into possible inputs for the continuous improvement of both group policies and the implemented management system;
- develop and promote a risk-based thinking approach inside the organization;
- analyze and monitor the evolving needs of the market, of the Customers, of regulations, of the context in which TAS group operates, evaluating risks and opportunities and adopting development strategies and, where necessary, of resilience;
- ensure that employees are adequately competent and aware in carrying out their activities;
- continuously improve the implemented system, also through the sharing of needs, experiences, methodologies and tools among the companies that make up the Group.

3. Data and information security policy

The security of data and information is now a vital requirement for any company in any market.

TAS group, by the very nature of the products and services offered and for reference Customers, must pay close attention on this issue, ensuring commitment and investments in the technical organizational, managerial, training scope.

TAS, in order to develop its innovation capacity by ensuring effective information management, defines the general principles of information security to be followed in order to develop an efficient Management System, also through:

- investments for the renewal of the products and services offered, also through the adoption of best practices in the field of IT security,
- the growth of information security skills,
- the ongoing assessment and monitoring of threats and associated risks;
- the assessment and implementation of investments for structures and infrastructures adjustments
- punctual attention to the security needs expressed by customers;
- the compliance with legislative requirements, regulatory and contractual matters relating to the security of data and information, including personal ones;
- compliance with the security needs of the national and international IT market.

For TAS, the protection and governance of data and information, of the technological, physical, logical and organizational structure relating to them are of primary importance, by respecting the following properties:

1. Confidentiality: ensuring that the information is accessible only to the subjects and/or processes involved and duly authorized through specific documentation (circulars, appointments etc...);
2. Integrity: safeguarding the content of the data from unauthorized changes;
3. Availability: ensure that authorized persons have the right to request and access the information and tools associated with them;
4. Control: ensuring that data management always takes place through efficient and tested processes and tools;

As regards the management of the products and services offered, TAS, through its technological infrastructure, guarantees:

- full compliance with the Service Level Agreements established with customers;
- customer satisfaction;
- compliance with current regulations and international safety standards;
- the selection of reliable suppliers and partners in the treatment of the company's information assets;
- the integrity of its infrastructure.

The information security policy applies:

- to all internal staff and third parties who collaborate in the management of data and information,

- in all processes relating to the design, implementation, start-up and continuous provision of services.

The TAS security policy represents the organization's commitment to customers and third parties to guarantee the security of personal data, information and physical, logical and organizational tools for the processing of such data and is inspired by the following principles:

a) ensuring to the organization the fully knowledge of data and information managed and he assessment of their criticality, in order to facilitate the implementation of the appropriate levels of protection

b) ensure secure access to information so as to prevent unauthorized or unnecessary processing;

c) ensuring that the Organization would follow the defined instructions in order to make efficient the Management System

d) increase staff awareness and sensitivity to privacy and cybersecurity issues through appropriate training and by adopting appropriate procedures and policies aimed at compliance with adequate levels of security;

e) ensure that the organization and third parties cooperating in the processing have full awareness of security issues;

f) ensuring that security by design and by default issues are among the basic requirements in software development and service delivery;

g) ensure the only authorized personnel are allowed access to company premises, facilities and related assets;

h) ensuring compliance with legal requirements and compliance with security commitments set out in contracts with third parties;

i) ensure that anomalies and incidents affecting the information system and corporate security levels are promptly recognized and properly handled through prevention, communication and resolution systems in order to minimize the impact on business;

j) ensure the training and ongoing awareness of staff on data and information security issues.

The information security policy is constantly updated to ensure its continuous improvement and is shared with the organization, third parties and customers, through an intranet system and specific communication channels.

The Company Management, in line with the evolution of the business and market context, assesses any actions to be taken in relation to events such as:
- significant business developments;
- new threats compared to those considered in the risk analysis activity;
- significant security incidents;
- evolution of the regulatory or legislative context regarding the secure processing of information and personal data.

4. Personal data management and privacy policy

TAS group pays great attention to the management of personal data, whether processed as Data Controller or on behalf of its Clients as Processor/Other Processor.

TAS group is committed, in addition to what has already been defined in the section on Data and Information Security Policy, to maintain an organizational model that allows for the following:

a) Ensure that the processing of personal data, sia a livello aziendale che nel rapporto con gli Stakeholder, sia effettuato nel rigoroso rispetto della legislazione vigente e di standard di riferimento internazionali;

b) ensure that a suitable organizational, procedural and documentary system compliant with the requirements of the GDPR is available and kept updated, designed with a view to privacy by design, in order to ensure compliance with the processing of personal data starting from the organization of processes;

c) ensure that the topics of privacy by design and by default are among the basic requirements in software development and in the provision of services;

d) ensure that the requirements inherent in the processing of personal data in contracts are punctually analyzed, carefully evaluating the requirements and instructions defined by Clients;

e) ensure that third parties cooperate in the proper handling of personal data and relevant information by adopting specific agreements to regulate the management of privacy and information security responsibilities;

f) define and maintain updated specific organizational procedures dedicated to the management of the data subject's requests and any data breaches;

g) ensure staff training and awareness on issues related to the management of personal data.

5. Business continuity policy

TAS group Business continuity constitutes often integral part of the services offered, for this reason maintaining and developing processes to ensure it in the face of even very complex crisis situations is a critical success factor.

The Executive Board is well aware that an organic and structured approach is indispensable in order to ensure business resilience in order to guarantee its customers high standards of performance in the delivery of essential services.

TAS group is committed, in addition to what has already been defined in the section on Data and Information Security Policy, to maintaining an organizational model that allows it to:

a) analyze business processes and determine the impacts that unexpected events may have on the organization, customers and stakeholders

b) evaluate and classify the processes in relation to their criticality for the company business continuity, defining the related Service Level Agreements;

c) identifying and analyzing threats that may impact the business continuity of processes, assessing the risks associated with them, and defining related mitigation actions

d) ensure business continuity through the application of established security procedures and the adoption of appropriate facilities and technical tools;

e) ensuring the business continuity of the services offered to the Customers, defining dedicated plans in line with regulations and SLAs to which the customers themselves are subject;

f) analyze overall business resilience in the face of events that can be even very large in scope, evaluating, with a view to continuous improvement, technical, organizational, and infrastructural improvements that can strengthen it;

g) ensure, also in business continuity processes, attention to the proper management of data and information, including personal information, even in emergency situations. Indeed, moments of crisis inherently result in an increased risk of security loss;

h) ensure that personnel are properly trained and, above all, aware of their activities and responsibilities even in times of crisis.

6. Ethics and corporate culture

TAS group places at the center of its objectives the importance of ethical and social responsibility in carrying out its business activities in order to strengthen the relationship of trust with its Stakeholders. For this reason, it has defined and adopted a Group Code of Ethics, which establishes the set of principles, corporate values, duties, rights and responsibilities towards all those with whom the companies relate in the exercise of their business. The Code of Ethics defines the reference standards, principles and norms of conduct that must guide the behavior and activities of those who operate within the company, summarized below in this policy.

Reciprocal behaviors and conduct towards people working in TAS group, customers, suppliers, other business partners and competitors must be inspired by respect, courtesy, fairness and professionalism.

TAS, in the context of its workplaces:
- is committed to developing an environment characterized by respect, professionalism and dignity and is committed to maintaining inclusive working conditions,
- does not discriminate, in employment opportunities, benefit or privilege, by race, skin color, national or ethnic origin, age, religion, disability status, pregnancy, sex, sexual orientation, identity or gender expression, genetic information, status civil or other protected categories,
- does not tolerate discriminatory actions or conditions and prohibits harassment, including verbal, written or physical conduct aimed at threatening, intimidating or obliging a candidate, employee, client or other person who works for or on behalf of TAS.

Unwanted sexual advances, requests for sexual favours or other physical or verbal conduct of a sexual nature are prohibited which:
- is rendered as a term or condition of use, explicitly or implicitly;
- is used as a criterion for an employment decision;
- interferes unreasonably with job performance or creates an intimidating work environment.

In addition, retaliation against anyone who makes complaints in good faith for harassment or discrimination, who expresses concerns about conduct prohibited by this policy, or who has collaborated in investigating a complaint, is not tolerated.

TAS promotes the value of its people in order to improve and increase the assets and competitiveness of the skills possessed by each Employee, in order to comply with current laws, the code of ethics, internal regulations, and to avoid potential conflicts of interest.

TAS also in relations with external stakeholders of the organization:
- avoids, in decisions that affect relations with interested parties (the choice of customers to be served, relations with shareholders, personnel management, work organization, selection and management of suppliers, relations with the surrounding community and the institutions that represent it), any discrimination based on age, sex, sexuality, health status, race, nationality, political opinions and religious beliefs of its interlocutors;
- ensures the confidentiality of the information in its possession;

- endeavours to ensure that economic / financial performance safeguards and increases the value of the company, in order to adequately compensate the risk that shareholders assume with the investment of their capital;
- focuses its activity on the satisfaction and protection of its customers by listening to requests which may favour an improvement in the quality of products and services;
- directs its research, development and marketing activities to high quality standards for its services and products.

7. Environmental policy

For the very nature of the performed activities, TAS group companies have limited environmental impacts and are managed in strict compliance with the legislation in force in each country in which the Group's companies are present.

TAS group is conscious of the importance that respect and protection of the environment play in every area of society, which is why it is committed to:
- Comply with obligations under applicable environmental legislation in force;
- Minimize negative impacts on the environment as much as possible to protect human health and the environment itself;
- Promoting waste reduction by implementing waste separation activities;
- Decrease its contribution to pollution by improving the efficiency of its use of natural resources (e.g. energy, water, paper);
- Developing awareness of the environmental implications of logistics and mobility by promoting the choice of hybrid/electric company cars;
- Raise awareness and educate staff by promoting the adoption of environmentally friendly rules of behavior;
- Raising awareness of suppliers' attention to the environment.

8. Policy for diversity and gender equality

The TAS group, in every company that constitutes it and at any organizational level, recognizes and welcomes the benefits of diversity in all its aspects, including gender, age, ethnicity, geographical origin, cultural identity, seniority as well as disability and sexual orientation.

The TAS group strongly believes in the values of inclusivity, gender equality, and non-discrimination and integration within both corporate and social contexts.

The TAS group is aware that today, more than in the past, it is necessary to seize the great value of full *female empowerment*.

To this end, the TAS group ensures that the management of all stages of a resource's lifecycle within the Organization – selection, onboarding, access to training, and career development paths, including pay – is based on the principle of equal opportunities, inclusion, and meritocracy. Appropriate reporting and monitoring systems are guaranteed, in order to identify and eliminate any possible misalignments.

The TAS group has decided to adopt corporate policies aimed at reducing the *gender gap* in all areas considered most critical: professional growth opportunities in the company, pay equality, management policies of gender differences, and maternity protection.

It is widely recognized that companies that adopt a more inclusive approach at all levels are able to create higher value, embracing a long-term vision, and a marked sensitivity to issues of sustainability and innovation. For this reason, starting from the parent company, TAS has decided to also adopt for this area a management model that ensures over time the maintenance of the defined and implemented requirements, measuring the progress of results through the preparation of specific KPIs (*Key Performance Indicators*), on 6 dimensions:

- culture and strategy;
- governance;
- HR processes;
- gender-neutral growth opportunities in the company;
- gender pay equity;
- parental protection and work-life balance.

The TAS group is firmly convinced that inclusion and meritocracy are essential conditions for sustainable economic and social development. For the development of an authentic culture of gender equality within the group, the Management has enunciated this Policy, setting the following objectives:

- Create a working environment in the group that is fair in terms of equal career opportunities, competitiveness, and flexibility;
- Support the increase in female employment;
- Ensure gender pay equity, facilitating the participation and retention of women in the workplace, through the support of caregiving burdens, valuing skills, ensuring fair remuneration of work and occupations with equivalent socioeconomic value, and promoting a condition of economic independence (**equal pay for equal work**);

- Ensure equal opportunities in the development of skills and the application of individual talents, guaranteeing fair and equal participation in training and enhancement paths, with the presence of both genders, including courses on leadership.

To achieve the above goals, the TAS group commits to:

- Ensure additional flexibility for workers with parental and/or caregiving commitments;
- Implement governance and monitoring of *diversity* and *gender parity* in the company;
- Adopt practices appropriate for the dissemination of the Gender Policy within the corporate context and dissemination of information related to *gender parity*;
- Support working mothers and fathers, providing policies and benefits, beyond the reference CCNL, dedicated to the protection of maternity/paternity and services to facilitate the reconciliation of personal and work life times;
- Promote the transversal promotion of the principle of gender equality for each level of contractual classification, as well as the introduction of notions of gender mainstreaming;
- Foster the promotion of language that facilitates dialogue and the overcoming of sexist expressions or manifestations.

Finally, the TAS group prepares and disseminates to stakeholders a communication plan related to its commitment to the themes of gender equality, ensuring that communication is consistent with the principles of the Policy and with the objectives established and implemented through the strategic plan. In communication activities, the TAS group pays the utmost attention to avoiding gender stereotypes in advertising actions, ensuring a periodic review of materials and marketing strategies, committing to disseminating a positive image of women and girls, using language respectful of gender differences.

Within the strategic plan, the objectives that the Senior Management, supported by the Gender Equality Steering Committee, intends to pursue are identified.

The suitability of this Policy is reviewed every year during the activities of reviewing the Business Management System.

The responsibility for the implementation of this Policy is entrusted to the Gender Equality Steering Committee.

9. Occupational health and safety policy

The TAS group believes that business should be carried out in a way which meets economic objectives by constantly improving the health and safety conditions of workers.

The company's health and safety policy has the following objectives:

- ensure compliance with applicable legal requirements and all other requirements established internally within the TAS group, related to its own risks;

- to prevent accidents and occupational diseases on a continuous basis and to improve the general health and safety conditions at work;

- increase awareness and sensitivity to health and safety at work within the TAS group by promoting proper training/information, and by arranging for staff participation in specially organised courses, and stressing the importance of each person's contribution.

The main tools for achieving the above objectives are:

- compliance with all existing laws, regulations and standards relating to occupational health and safety;
- the prevention of occupational accidents and diseases through a careful risk assessment and verification of the implementation of the prevention and protection measures contained therein, as well as the analysis of accidents and incidents that have occurred;
- the management of all emergencies and accidents that may occur, in order to minimize the effects that may result from them and in order to minimise the likelihood that any accident will occur again, resulting in work-related accidents;
- the awareness and training of its personnel to promote the dissemination of the principle of compliance with safety standards, so that they participate in and are the architects of continuous improvement;
- the organisation of a control system to monitor the effective application of the above.