

QMS AND ISMS POLICY

ACTION	FUNCTION	NAME	DATE
Approved	General Management		02/19/2024
Prepared	Quality Manager		02/19/2024

Confidentiality level	Public
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COMPET-E SRL - A TESISQUARE® ECOSYSTEM COMPANY

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ISO/IEC 27001:2022
IIS-0223-01
UNI EN ISO 9001:2015
IQ-0423-02

VERSION HISTORY

DATE	REVISION	CREATED BY	DESCRIPTION OF CHANGE
11/14/2022	1.0		Creation of the integrated management system document
02/28/2023	1.1		Letterhead update
06/29/2023	1.2		Alignment of the ISO/IEC 27001 scope as proposed by DASA
02/19/2024	1.3		Update to ISO/IEC 27001:2022 standard

STANDARD REFERENCES

STANDARDS	SPECIFIC REFERENCE
ISO/IEC27001:2022	Clause 5 “LEADERSHIP”
UNI EN ISO 9001:2015	Subclause 5.2 “Policy”

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1. SCOPE, PURPOSE AND RECIPIENTS

The purpose of this document is to describe the policy of Compet-e Srl's integrated QMS and ISMS management system.

2. POLICY

Compet-e Srl has decided to align its quality processes with the UNI EN ISO 9001:2015 standard and the ISO/IEC 27001:2022 standard, with extension to ISO/IEC 27017:2015 and ISO/IEC 27018:2019, with regard to the protection of information relating to the following scopes:

For the ISO/IEC 27001 standard:

Design and development of IT solutions in the field of regulatory compliance. Installation, support and maintenance of such solutions in On Premises mode. Provision of such solutions in SaaS mode. Consulting in the field of regulatory compliance through application of the ISO/IEC 27017:2015 and ISO/IEC 27018:2019 guidelines.

For the ISO 9001 standard:

Design and development of IT solutions in the field of regulatory compliance. Installation, support and maintenance of such solutions in On Premises mode. Provision of such solutions in SaaS mode. Consulting in the field of regulatory compliance.

The purposes of the management system are:

- Achieving full customer satisfaction through continuous improvement of business processes;
- Ensuring high quality standards in the services offered to customers;
- Promoting a quality culture within the company at all levels; the company also undertakes to communicate and disseminate its commitment to quality outside the company;
- Providing customers with a quality service that satisfies their explicit and implicit requirements;
- Ensuring the confidentiality, integrity and availability of information for interested parties;
- Minimising the impact of any information security incident;
- Ensuring service continuity in accordance with applicable regulations and contractual requirements;
- Continuously improving information security while taking into account the ongoing evolution of technological aspects;
- Planning processes using a risk-based approach in order to implement the most appropriate actions to assess and treat process-related risks and to exploit and strengthen identified opportunities.

Compet-e is committed to constant improvement of the management system, taking into account that:

- This requirement arises from the need to respond to the multiple requests coming from both outside and inside the organisation, including the need to comply with the GDPR provisions on the protection of the personal data of customers and employees.
- The organisation has identified the risk owner roles (hereinafter "RO") and the interfaces for information security matters with third parties. The ROs shall report on information security trends and status at defined intervals.
- The organisation has appointed the corporate ICT department, with the support of external consultants for technological aspects, to address information security and to support the definition of the management system. The ICT department also acts as the manager of technical anomalies and information security incidents.
- Compet-e Srl has defined objectives that are updated during Management Review or whenever deemed necessary by Compet-e Srl's Management. The ROs and the Quality Manager are responsible for monitoring them and for identifying any deviations from what has been established.
- Compet-e Srl prepares annual training and internal audit programmes through which it ensures control over its management system.
- Compet-e Srl undertakes to comply with laws and directives on data protection and information security, as well as with the legal requirements applicable to its services (e.g. Law 48/2008, intellectual property rights, administrative liability, etc.).
- All personnel are focused on continuous improvement of the management system through performance measurement, internal audits and review.



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3. RESPONSIBILITIES

The ROs and the Quality Manager are responsible for:

- Ensuring that the management system is implemented and maintained in compliance with this Policy and that all necessary resources are available;
- Operational coordination of the management system and reporting on its performance;
- Ensuring integrity, availability and confidentiality in activities;
- Managing non-conformities and incidents;
- Defining which information security information will be communicated to which interested party (internal or external), by whom and when;
- Adopting and implementing the training and awareness plan, which applies to all persons who have a role within the management system.

The roles of Risk Owner and Quality Manager are identified within the company organisation chart.

The management system policy is communicated within Compet-e Srl through specific training sessions.

The policy may be communicated externally (customers, suppliers, authorities, etc.).

This Policy shall be reviewed and updated by the Management of Compet-e Srl whenever substantial events or changes involving company assets occur, and shall be analysed at each Management Review.



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