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# INTEGRATED MANAGEMENT SYSTEM POLICY

## QUALITY – OCCUPATIONAL HEALTH AND SAFETY – ENVIRONMENT – INFORMATION SECURITY

Approved by	
Management of Estra S.p.A	.....
Management of Estra Energie S.r.l.	.....
Management of Estracom S.p.A	.....
Management of Estra Elettricità S.p.A.	.....

Rev.	DATE
00	4 September 2017



## INTEGRATED MANAGEMENT SYSTEM POLICY

This Policy applies to all Estra Group companies.

Estra and its investees regard ongoing improvement as fundamental to ensuring the excellence and efficiency of the services offered. The Quality Management System has always been among the main objectives of our Company policy. This is why we have implemented an Integrated System for the Management of Quality, the Environment, Occupational Health and Safety and Information Security.

This translates into a steady commitment by everyone who works at Estra and into the ability to innovate. We aim to reach new milestones, keep our promises to our customers and ensure that expectations are met consistently.

We have made good on this pledge by obtaining several important certifications, as summarised below:

COMPANY	CERTIFICATIONS			
	ISO 9001	ISO 14001	OHSAS 18001	ISO 27001
ESTRA	X	X	X	X
ESTRA ENERGIE	X	X	X	-
ESTRACOM	X	X	X	X
ESTRA ELETTRICITÀ	-	-	X	-

ESTRA and its investees plan their processes according to a risk-based thinking approach, with the aim of promoting an adequate sense of pro-activeness in managing the Organisation's risks and opportunities at all levels. In pursuit of this goal, an appropriate scenario analysis was conducted, involving an identification of all stakeholders and consisting of the following steps:

- assessing and managing the risks associated with processes;
- taking advantage of and building on the opportunities identified.

### ONGOING IMPROVEMENT OF THE INTEGRATED MANAGEMENT SYSTEM

Each member of the Organisation is required to take an active part in applying and improving the Integrated System for the Management of Quality, the Environment, Occupational Health and Safety and Information Security, to collaborate with the Company's management in the design of management procedures and to be actively involved in identifying and promptly addressing any cases of non-compliance.

With support from the Integrated Management System, the management aims to instil a constructive mentality in the organisation, thus enabling regular achievement of the established objectives and constant improvement of the organisation's performance.

Optimal management of the Company requires that all those who operate within the organisation take the view that full compliance with all provisions of law governing and regulating the enterprise's activity is



fundamental. In particular, the management asks that all individuals comply fully with applicable regulatory provisions and all other statutes adopted by the organisation.

## QUALITY

The quality policy is based on the following principles:

### ➤ **A FOCUS ON CUSTOMERS AND STAKEHOLDERS**

**ESTRA** is committed to understanding the needs of its (internal and external) customers and therefore plans its activities in a way that ensures that its customers are completely satisfied. By the same token, it also strives to satisfy the demands and requirements of:

- its market of reference;
- the country in which it operates, by complying with its laws and regulations;
- all parties involved in its critical processes.

Estra is committed to satisfying its customers' needs by:

- systematically verifying adherence to contractual terms and to the standards set by the Italian Electricity and Natural Gas Authority and the Italian Communications Regulatory Authority, in addition to achievement of internal objectives;
- constantly monitoring the quality delivered to customers on the basis of appropriate statistical indicators, in comparison with the top performers in the industry;
- measuring Customer satisfaction levels through periodic surveys and analysing complaints received;
- adopting the most effective forms of feedback from external and internal customers, focusing on their needs and expectations and providing responses tailored to their diverse needs.

### ➤ **PROCESS-BASED APPROACH**

**ESTRA** views the organisation's various activities as processes to be planned, monitored and improved on an ongoing basis, and it uses its resources as efficiently as possible to implement these processes.

**ESTRA** strives to ensure that its processes have:

- clear goals to be pursued and expected results;
- clearly assigned responsibilities and resources.

### ➤ **LEADERSHIP**

**ESTRA** is responsible for the efficacy of its QMS. It provides all the required resources and ensures that the planned objectives are compatible with the organisational context and strategic guidance.

**ESTRA** seeks to raise awareness of the importance of the QMS and actively involves all interested parties, providing its coordination and support.

### ➤ **ASSESSMENT OF RISKS AND OPPORTUNITIES**

**ESTRA** plans its processes according to a risk-based thinking approach with the aim of implementing the most appropriate measures to:

- assess and manage risks associated with processes;
- take advantage of and build on the opportunities identified.



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**ESTRA** promotes a sense of pro-activeness in managing the Organisation's risks at all levels.

➤ **INVOLVEMENT OF PERSONNEL AND STAKEHOLDERS**

**ESTRA** is aware that securing the engagement of its personnel and all its stakeholders, in addition to the active participation of all its contractors, is a key element of its strategy.

**ESTRA** promotes:

- the development of internal personnel to improve the quality of human resources, offering them training, ongoing professional refresher courses and proper allocation, as well as development of competencies and the use of information technology;
- the accountability, engagement and motivation of all personnel, by fostering exchanges and promoting a pro-active approach through periodic meetings, group work and other activities;
- careful selection of external contractors in pursuit of competent, motivated human resources that follow and internalise the principles of the Group's QMS.

➤ **IMPROVEMENT**

**ESTRA** remains committed to constantly improving the performance of its QMS. The organisation conducts preliminary assessments of the risks and opportunities associated with company processes, in addition to internal and external verification and management reviews, as a means of ensuring ongoing improvement.

It also seeks to ensure the continuous improvement of the efficacy and efficiency of its Quality Management System by:

- constantly improving the quality of the services delivered to its Customers, with the goal of pursuing technological excellence, as well as organisational simplicity and management efficiency, in order to meet Customers' needs and contain costs;
- seeking to optimise company processes with the aim of reaching a maximum level of efficiency and effectiveness and improving quality of service;
- requiring that the management periodically reviews the information provided by the company reporting system and internal audits regarding the degree of achievement of objectives, the efficacy of procedures and any corrective measures.

**The Organisation has adopted a Quality Management System consistent with the UNI EN ISO 9001 standard, 2015 edition, as a means of implementing its Policy.**



## OCCUPATIONAL SAFETY

Health and safety in the workplace are a priority for the Company. As such, they are the focus of constant efforts on the part of **Estra** and its investees to provide effective, full protection of individual health, safety, wellbeing and dignity in all working environments.

**Estra** is aware of the importance of these issues in the market and business community and of the responsibility that all companies bear towards the health and safety of their workers.

An Occupational Health and Safety Management System compliant with the OHSAS 18001:2007 standard has thus been implemented. Accordingly, **Estra** promotes a Health and Safety Policy that provides guidance and orientation, in accordance with the following principles:

- respect for all current national and EU regulations on accident prevention (also taking technical regulations and international standards into consideration) among all those working within the organisation. The management asks that all those who are a part of the Estra Group comply fully with all applicable laws and other regulatory provisions on worker health and safety that the Group has adopted;
- promotion of employee participation in the process of preventing risks and protecting the health and safety of their co-workers and third parties. In fact, it must be crystal clear to members of the organisation:
  - that everyone carries out tasks and activities that are a source of potential risks to themselves and other people;
  - that risks to the workers' health and safety can be eliminated or kept under control through the adoption of collective and/or individual prevention and protection methods;
- selection of suppliers and purchases in accordance with the principles of protection of the health and safety of workers and of the public at large,
- the ongoing improvement of the Occupational Health and Safety Management System. All those involved in ESTRA are asked to take an active part in managing worker health and safety and improving the management system by:
  - participating in drafting the management procedures and safe working procedures deemed necessary;
  - reporting and managing any cases of non-compliance brought to light.

In application of the above-mentioned principles, **ESTRA** undertakes to:

- ensure that all personnel and all other subjects concerned are aware of the occupational health and safety policy, the principles behind it and its objectives, using the most appropriate means to this end;
- prevent accidents and occupational diseases;
- carry out ongoing training, information and awareness campaigns among the management and workers so that they are as well-equipped as possible to carry out the tasks assigned to them in total safety;
- design and implement production processes and activities on the basis of criteria able to prevent potential accidents, safeguard the health and safety of workers and the general population, adopting the best techniques available on the market for this purpose;
- adopt organisational processes and models that can also be used to trace the relative responsibilities;
- pursue the ongoing improvement of Occupational Health and Safety performance;



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- pursue the ongoing improvement of the OHSAS 18001:2007-compliant management system it has implemented internally;
  - pursue the goal of "zero accidents", including through survey of the "near misses" that constitute important signs of improvement;
  - ensure the availability of appropriate human, instrumental and economic resources;
  - create and keep open channels of dialogue in pursuit of collaboration with civil society, local institutions, trade associations, supervisory authorities and all other interested parties, with the aim of transparently communicating and promoting the Company's efforts in the area of Occupational Health and Safety.

The ESTRA Group is committed to ensuring that its Policy, principles and objectives translate into measurable, periodically reviewed milestones, so that they become increasingly effective means of pursuing the ongoing improvement of workplace health and safety conditions.

## ENVIRONMENT

On the basis of an in-depth Analysis of the Environmental Aspects and Impacts that may result from its business operations, the Company's management has identified several priority areas of intervention and accordingly intends to take the following actions:

- implement an Environmental Management System that satisfies all of the requirements of the UNI EN ISO 14001/2015 standard;
- obtain and maintain over time the certification of its Environmental Management System by an accredited third party organisation;
- comply with all applicable laws and/or regulations regarding environmental matters to which the organisational has committed;
- develop and use appropriate procedures for identifying and minimising the negative environmental impacts of its business, including hardship caused to the local population;
- promote accountability among its employees and internal contractors for protecting the environment and creating personnel information and training programmes;
- prevent pollution and the possible environmental risks tied to the organisation's business by conducting advance assessments and appropriately monitoring all critical parameters with the due vigilance;
- adopt all measures necessary to reducing the environmental impacts of emergency situations;
- raise awareness among its suppliers and external contractors of the environmental management principles laid down in this Policy;
- pursue actions aimed at maximising energy savings;
- promote and implement waste sorting;
- make this Environmental Policy available.

The management performs the following activities to render the Environmental Policy operational and pursue ongoing improvement of company performance:

- it sets and periodically reviews environmental objectives and milestones;
- it assigns responsibilities and provides the resources needed to see them through;



- it systematically verifies the adequacy of the said environmental objectives and milestones;
- it systematically verifies the results achieved.

## INFORMATION SECURITY

On the basis of an assessment of the information security risks posed by the provision of management services by the data centre, **the management of Estra S.p.A.** has set the following main objectives for the implementation of the Information Security Policy:

- ensuring data and information security in terms of confidentiality, integrity and accessibility, for clients and group companies, through the application of management systems for the data centre's services;
- increasing the information security of company and client data by developing data security standards that exceed the minimum requirements set in applicable technical regulations;
- ensuring information security through constant management of data centre infrastructure;
- reducing the vulnerability of its assets through periodic assessments of the risk of data and information security breaches;
- supporting improvement and information processing plans designed to reduce information security risks;
- ensuring compliance with applicable laws and regulations on data processing and protection.

The management takes the following steps in view of operational implementation of the Information Security Policy and ongoing improvement of company performance:

- it sets and periodically reviews data security objectives and milestones;
- it assigns responsibilities and provides the resources needed to see them through;
- it systematically verifies the results achieved;
- it periodically assesses information security risks.

**The management of Estracom S.p.A.** considers information security:

- a value, even more than a factor indispensable to protecting its information assets;
- an aspect of strategic importance that yields a clear competitive advantage, through the resulting focus on information security matters in the course of providing its services;
- not a mere IT issue, but a subject that encompasses all aspects of the Company's business, from server housing and hosting, paper documentation management, privacy management, the protection of trade secrets against industrial espionage or theft and the physical security of the places and objects in which information is stored, i.e., company assets.

For the reasons set out above, Estracom intends to adopt the measures of both a technical and organisational nature required to best ensure the integrity, confidentiality and accessibility of both internal and customer information assets. Accordingly, Estracom has implemented an Information Security Management System (ISMS) designed according to rules and criteria inspired by best practices and compliant with the international standard UNI CEI ISO IEC 27001:2014. The System applies to all activities identified as falling within its scope.

The ISMS comprises a corpus of organisational, technical and procedural measures aimed at protecting:

- confidentiality, i.e., the property of information that is known only to authorised persons;



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- integrity, i.e., the property of information that is protected in terms of its accuracy and completeness;
  - accessibility, i.e., the property of information that is accessible and usable where requested by processes and authorised users.

The strategic objective pursued by Estracom in its information security management system is thus to ensure an adequate level of data and information security in planning, developing and providing company services by identifying, assessing and managing the risks to which those services are exposed. One of the aims of this Policy is to formally establish the following information security objectives:

- to protect the Company's image as a reliable, competent supplier as effectively as possible;
- to protect the Company's information assets;
- to adopt measures suited to promoting the retention and professional development of company personnel;
- to comply fully with the requirements of binding applicable legislation;
- to increase the level of awareness and competence with regard to security among company personnel.

In pursuit of these aims, in its ISMS documentation Estracom has identified risk assessment and management methods and evaluated the investment in economic terms required to implement and maintain the system. Finally, Estracom's management is committed to regular reviews of the Policy to identify any changes affecting it and to ensure that it remains suited to Estracom's business and ability to satisfy its customers, suppliers and other stakeholders, with a view to ongoing improvement.

**This Policy is to be circulated to all levels of the Organisation and all stakeholders concerned, in addition to being made available to the public.**