	INFORMATION SECURITY POLICY	Document: PO-DPISMS.00.EN
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INFORMATION SECURITY POLICY



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1. SCHEDA DEL DOCUMENTO

Revision

REV	Page	Date	Description	
0	All	03/02/2025	Firtst edition in the DPISMS	
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2. PURPOSE

This policy defines the fundamental principles and objectives for managing information security within Erre Company S.r.I., ensuring the protection of the integrity, confidentiality, and availability of corporate information. It complies with the requirements of TISAX (VDA/ISA 6.03) and the ISO/IEC 27001:2022 standard. Its purpose is to safeguard the organization's information assets, support the achievement of strategic objectives, and ensure compliance with applicable regulations.

3. SCOPE

This policy applies to:

- All employees, collaborators, suppliers, partners, and third parties who access, process, or manage corporate information, in any format (digital, paper, or otherwise).
- All corporate information, processing locations, processes, information systems, devices, and networks.

4. DEFINITION OF INFORMATION SECURITY

Within Erre Company, information security is defined as the set of measures and practices aimed at protecting corporate data, regardless of the format in which it is stored or processed, to ensure the following fundamental principles:

- **Confidentiality:** Information must be accessible only to authorized individuals, preventing unauthorized access or disclosure.
- **Integrity:** Information must be accurate, complete, and protected from unauthorized alterations, ensuring it remains reliable and correct.
- **Availability:** Information and the systems managing it must be accessible in a timely manner whenever needed for business activities.
- **Traceability:** Critical activities related to information security—including access, modification, processing, and transfer of sensitive data—must be recorded, documented, and verifiable. Traceability is essential to ensure accountability, assign responsibilities, and meet specific legal and regulatory compliance requirements.

5. OBJECTIVES OF INFORMATION SECURITY

Erre Company is committed to achieving the following objectives:

- To identify and classify information based on its criticality with respect to the loss of confidentiality, integrity, and availability.
- To protect corporate information from internal and external threats by adopting a risk-based approach.
- To ensure compliance with applicable laws, regulations, standards, contractual obligations, and legal requirements.
- To define clear roles and responsibilities for managing information security.
- To promote a corporate culture focused on information security by raising awareness and providing training to employees.
- To prevent and manage security incidents, ensuring timely response and swift recovery of operations in case of emergencies.
- To ensure business continuity by preserving the company's ability to carry out its activities even in crisis situations.
- To safeguard the security of technological assets and systems supporting information processing.
- To ensure the security of communication channels, protecting data during transmission.
- To document and monitor critical activities, ensuring transparency, accountability, and traceability.
- To develop business processes based on recognized standards, established methodologies, and industry best practices.
- To demonstrate commitment to clients and stakeholders by protecting their information and, when necessary, considering the adoption of specific certifications.



- To support clients in managing security risks through both documentation and practical measures for risk prevention.

. MANAGEMENT PRINCIPLES

The achievement of information security objectives is governed by the following principles:

- a. Compliance with all applicable laws and regulations related to information security and personal data processing, including Regulation (EU) 2016/679 GDPR and local legislation.
- b. Adoption of a risk-based approach to information security management.
- c. Implementation and maintenance of an Information Security Management System (ISMS) in accordance with the requirements of ISO/IEC 27001:2022 and TISAX VDA/ISA 6.03.
- d. Continuous monitoring and improvement of security controls and processes.
- e. Collaboration with and support for all internal and external stakeholders in managing incidents and mitigating their impacts.

7. RESPONSIBILITY

Within Erre Company, responsibilities for information security are distributed as follows:

- Top Management: Responsible for approving the information security policy and providing the strategic support needed to ensure its effective implementation. This includes providing adequate resources, clearly defining roles and responsibilities for information security management, and actively promoting a security-oriented corporate culture by encouraging responsible behaviour at all levels of the organization.
- Department or Service Managers: Responsible for implementing, maintaining, and monitoring information security measures within their respective areas. They must ensure that processes and services comply with corporate policies and collaborate with other departments or services to mitigate security risks.
- Employees and Collaborators: Required to fully comply with the company's information security policies and procedures. They must adopt responsible behaviour in managing information and promptly report any security incidents, vulnerabilities, or non-compliant behaviours.
- Suppliers and Third Parties: Must strictly adhere to the security requirements defined in contractual
 agreements. They are responsible for ensuring that their activities and systems do not compromise the
 security of corporate information. Any violations or anomalies must be reported to the organization
 immediately.

3. APPLICABLE REQUIREMENTS

Erre Company is committed to complying with all applicable laws, regulations, and other mandatory requirements related to information security. This includes, but is not limited to, the protection of personal data, intellectual property, and contractual obligations with clients, suppliers, and other stakeholders.

9. MANAGEMENT COMMITMENT

Erre Company's management is committed to adopting this policy and contributing to the continuous improvement of the Information Security Management System by participating in the regular review of policies, controls, and the effectiveness of security measures.

10. HANDLING EXEMPTIONS AND EXCEPTIONS

Exemptions and exceptions to this Information Security Policy are permitted, subject to management approval, only in extraordinary and critical circumstances. All exceptions must be documented and reviewed regularly to verify the continued validity of the necessity that justified them.

11. CONFORMITY



This policy is continuously maintained in alignment with the applicable legislative, regulatory, and contractual requirements.

12. DISCIPLINARY ACTION

Any violation of the provisions contained in this document, or its annexes may result in the application of disciplinary measures and/or legal action, considering the potential negative impacts arising from negligent or intentional misconduct. Any infraction committed by employees, collaborators, or third parties acting on behalf of the organization will be considered a serious breach of contractual obligations and may be sanctioned in accordance with applicable laws, current employment contracts, and internal policies. Where necessary, the organization reserves the right to report such violations to the competent authorities, in compliance with local and international laws, to assess any civil or criminal implications.

13. VALIDITY, APPROVAL AND AMENDMENTS

This Information Security Policy is approved by management and is effective from the date of approval.

--- Fine del Documento ---

Moncalieri (TO) 3 February 2025 Erre Company s.r.l. CEO Rosario RADICE