

	INFORMATION SECURITY AND PRIVACY POLICY	Ref : ISPP-GRP-POL Date : 03/12/2024 Ver : 4.0 Page :1/2 Class : Public
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FIABILIS GROUP (FIABILIS) is a group of companies which, currently and within the framework of this Information Security and Privacy Information Management System, is made up of:

- ✓ FIABILIS HOLDING S.L., in Spain
- ✓ FIABILIS CONSULTING GROUP S.L., in Spain
- ✓ PRAEVENTIS ASESORES SOCIALES Y FISCALES S.L., in Spain
- ✓ FIABILIS CONSULTING GROUP POLSKA SP Z.o.o., in Poland
- ✓ FIABILIS CONSULTING GROUP FRANCE, in France
- ✓ FIABILIS GEIE, in France
- ✓ FIABILIS CONSULTING DEUTSCHLAND GmbH, in Deutschland
- ✓ FIABILIS CONSULTING GROUP BELGIUM SRL, in Belgium
- ✓ PRAEVENTIS BELGIUM SRL, in Belgium
- ✓ REDUCTIS SRL, in Belgium
- ✓ FIABILIS CONSULTING GROUP ITALIA SRL, in Italy
- ✓ G.P.N. LABOUR & PARTNERS . SOCIETA' TRA AVVOCATI , in Italy

They offer organisations quality services based on a wealth of experience that has been consolidated over the years and which is reflected in the confidence of all their clients. FIABILIS collaborates with the human resources departments of its clients, helping them to detect opportunities for savings and undue income in Social Security contributions. This increases the productivity of its clients through clear savings and measurable objectives; PRAEVENTIS works with the labour law department of its clients, helping them to improve their risks, and REDUCTIS works on the same opportunities as FIABILIS but only on SME market.

The Management of FIABILIS, in its desire to provide the best service to its customers, concerned about the IT Security of its assets and its Company, as well as that of its customers and interested parties, within the framework of a group, has decided to define, implement and certify an internationally recognized and approved Management System, based on the ISO/IEC 27001 and ISO/IEC 27701 reference standards for **The information systems that support the following services:**

- A. Audit in social insurance, social contributions, labour costs and all direct and indirect related taxes.**
- B. Social Security and labour consulting including administrative inspections. Working in all sectors, for both private sector and public sector employers**

according to the current statement of applicability (SOA) to the issued date of the certificate.

Information Security and Privacy Information Management System (IS & PIMS) is part of the continuous improvement strategy of FIABILIS (FIABILIS and PRAEVENTIS), providing a basis on which to structure its processes, optimizing them and improving their effectiveness and efficiency, making FIABILIS a safer and more competitive organization.

The management of FIABILIS needs and demands the fulfilment of operational processes so that, through the protection and analysis of data, it can manage its resources in an optimal way, as well as the fulfilment of all the requirements applicable to the quality of the service and the security of the information.

FIABILIS has determined that for all internal data, FIABILIS is Personally Identifiable Information (PII) Controllers and for client's data Fiabilis is PII Processor. Each role is subject of a separate set of controls. The IS & PIMS of FIABILIS has a risk-based approach as a fundamental element in the

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improvement of its efficiency, both in the context of its organization and in the processes identified for the delivery of the service.

The frame of reference for supporting our objectives is as follows:

The **MISSION** of our organisation is:

- The complete satisfaction of our clients' needs.
- The quality and reliability of the service provided
- Protection of FIABILIS' information assets in terms of confidentiality, integrity and availability.

And its **VALUES**:

- The seriousness, professionalism and dedication of the human team belonging to the organisation.
- Right-sized, integral, scalable, simple and cost-effective solutions for our organisation.

To this end, **GUIDELINES** are established:

- Compliance with legal, regulatory and normative requirements.
- Creativity, innovation and added value.
- Collaboration with suppliers and partners to provide solutions.
- Correct management of the IS & PIMS's risks, avoiding the degradation of the security of its assets.
- The permanent concern to protect the data entrusted by our clients
- Research and action on the causes of detected non-conformities, in order to prevent them and avoid their repetition.
- Continuous training of our staff.
- Continuous improvement and the spirit of self-improvement through compliance with the quality objectives established by the company.

Information security is part of a broader approach to corporate social responsibility, including environmental protection. We are committed to reducing the environmental impact of our information systems, particularly through the responsible use of technological and energy resources, as well as the sustainable management of IT equipment.

This management policy is disseminated, understood, implemented and kept up to date at all levels of the organisation and has the full commitment and support of the management of FIABILIS, which establishes, develops and applies it through the management system implemented.

In Madrid, 06/12/2024

Fiabilis Holding S.L. Administrators