



COMPANY POLICY

The Management of City Green Light S.r.l. is committed to implementing a policy appropriate to the company's objectives and context, focusing on full customer and stakeholder satisfaction, information security, environmental performance improvement, the commitment to preventing injuries and occupational diseases, the protection of human and labor rights, adherence to principles of ethics, legality, and transparency, and the commitment to continuous improvement of energy performance.

Additionally, all company areas are required to continuously and systematically improve the quality of the products/services offered, leveraging the best available technology, minimizing environmental impact, preventing pollution, enhancing health and safety performance, reducing risks, improving energy efficiency, protecting human and labor rights, and preventing and combating corruption.

The Management is committed to not providing or delivering products/services if work activities cannot be carried out in accordance with its policy principles. Furthermore, City Green Light S.r.l. aims to increase business potential in terms of employment and growth and to support initiatives aimed at mitigating climate change while respecting biodiversity, referencing the principles outlined in documents the company adheres to, such as those present in The EIB Statement of Environmental and Social Principles and Standards.

The Integrated Management System is based on the following elements:

- Commitment to the continuous improvement of the Integrated System;
- Commitment to providing safe and healthy working conditions to prevent injuries and occupational diseases, eliminating hazards, and reducing risks to health and safety in the workplace;
- Promotion of consultation, involvement, and conscious participation of workers and their representatives at all levels in the implementation of the Integrated System, including subcontractors working regularly with the company;
- Commitment to constantly updating and complying with current legislation and all other subscribed requirements, including those related to corporate social responsibility, corruption prevention, information security, workplace health and safety, energy efficiency, energy use, and energy consumption; this requirement is explicitly requested from key stakeholders;
- Continuous improvement of process management methods to achieve ever-better results and commitment to ensuring the availability of information and necessary resources to achieve objectives and targets;
- Strong collaboration and understanding with customers to properly assess and interpret their needs and operate optimally;
- Emphasis on resources and awareness of their importance within the corporate structure, prioritizing training and development of all personnel;
- Definition of procedures and instructions aimed at reducing waste and ensuring efficient energy use with the goal of energy savings and CO₂ emission reduction into the environment;
- Ongoing research that drives and projects the company workforce toward cutting-edge solutions and technologies that comply with health and safety standards and have a low environmental impact;
- Support for the procurement of energy-efficient products and services that contribute to improved energy performance;
- Continuous performance improvement through collaboration and coordination among corporate resources and the proper use of energy sources, designing and implementing solutions aimed at enhancing energy performance;
- Activation of programs to spread awareness and culture regarding corporate management system requirements, involving employees in energy use through appropriate communication, training, and information channels;
- Joint participation of workers and management in protecting human rights and prevention, complying with the requirements of the SA8000 standard and anti-corruption measures to identify and correct non-conformities and ensure compliance maintenance;
- Constant commitment to adapting to all requirements of the Social Responsibility standard and respecting relevant international instruments (ILO-UN, etc.);
- Commitment not to employ personnel who fall under the definition of "child" or "young worker" and/or a prohibition against supporting entities that use or encourage child labor;
- Promotion of dialogue and engagement with all internal and external stakeholders (public authorities, citizens,

CITY GREEN LIGHT S.R.L.

VICENZA, Via G. Zampieri 15 – 36100 | Tel. 0444.124.24.24
REA VI – 353810 | Cap. Soc. € 50.000.000 i.v. | Cod. Fisc e P. IVA 03785880240
info@citygreenlight.com | www.citygreenlight.com



associations, etc.), considering their demands, needs, and expectations, activating appropriate participation and communication tools to transparently report on company activities.

Regarding the information security management system, the Management aims to guarantee:

1. Confidentiality – ensuring that information is accessible only to authorized individuals and/or processes;
2. Integrity – safeguarding the consistency of information from unauthorized modifications;
3. Availability – ensuring easy access to necessary information;
4. Control – guaranteeing that data management processes and tools are secure and tested;
5. Authenticity – ensuring information originates from reliable sources;
6. Privacy – ensuring the protection and control of personal data.

City Green Light has also optimized its IT service management processes for information security in compliance with ISO 27001 standards, extending to ISO/IEC 27017 and ISO/IEC 27018 for the protection of information in cybersecurity and cloud computing services.

The need for this adaptation stems from responding to multiple internal and external requests, including the requirement to comply with GDPR regulations concerning the protection of customer and employee personal data.

Cloud Data Security and Management Standards Implemented:

- ISO/IEC 27018 (an extension of ISO 27001) regarding personal data management in cloud solutions such as IaaS, PaaS, and SaaS. Data management within our cloud services is subject to third-party evaluation in its technical, organizational, and contractual aspects;
- ISO/IEC 27017, which defines additional security controls and enhancements for cloud service providers, ensuring that these controls are integrated into the Information Management System.

The information assets of City Green Light S.r.l. that need protection consist of all data located at the Vicenza headquarters, including personal data and company know-how.

Due to the nature of its activities, City Green Light considers information security in cloud service management a fundamental factor for protecting its assets, customers, and business competitiveness.

A lack of appropriate security levels could result in damage to City Green Light S.r.l.'s activities, customer dissatisfaction, legal penalties for regulatory violations, and financial and reputational damage.

Anti-Corruption Commitment

In accordance with ISO 37001 standards, City Green Light S.r.l. strictly prohibits corruption in all forms, without exception, toward any public or private entity. Specifically, it is prohibited to:

- Offer, promise, give, pay, or authorize someone to give or pay, directly or indirectly, any undue economic advantage or benefit to a public official or private entity (Active Corruption);
- Accept or solicit a request, directly or indirectly, for an undue economic advantage or benefit from any entity (Passive Corruption).

City Green Light S.r.l. is also committed to the following objectives:

- Absolute prohibition of any form of corruption or attempted corruption;
- Strict compliance with current legislation on corruption prevention and control;
- Implementation of an ISO 37001:2016-compliant Anti-Corruption Management System as a safeguard against corruption and for continuous improvement;
- Encouraging the reporting of potential corrupt activities, providing employees and stakeholders with tools for reporting non-compliant behaviors and protecting whistleblowers from retaliation.

Commitment of the Management

The Integrated Management System for Quality, Environment, Health and Safety, Social Responsibility, Anti-Corruption, Information Security, and Energy Management follows international standards (ISO 9001, ISO 14001, ISO 45001, SA8000, ISO 37001, ISO/IEC 27001, ISO 50001) with the constant commitment of Management.

The Management is committed to:

- Implementing, supporting, and periodically verifying this Policy, and ensuring its dissemination to all individuals working for or on behalf of the company;
- Providing the necessary resources to ensure the effectiveness of management systems;
- Defining corporate objectives;
- Periodically reviewing the objectives and company policy to ensure its continued relevance.

This policy is reviewed as needed during Management Review meetings and is made available to stakeholders,



including publication on the company website.

Vicenza, 02/05/2024

General Management

A handwritten signature in black ink, which appears to read "Alessandro Cesente". The signature is fluid and cursive, written in a professional style.