

# **POL Management system policy**

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| <b>Company name</b>   | Zefi       |
| <b>Effective date</b> | 09/07/2025 |

## **Version history**

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## **Purpose**

The organization promotes production/service delivery policies that reconcile the needs for economic development and value creation inherent to business activities with the requirements for environmental protection, social responsibility and information and data security. It also undertakes to comply with applicable laws while encouraging the dissemination of a culture of respect for legal principles.

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## Field of Application

This policy outlines the commitment of Zefi's Top Management to the security, quality, and continuity of its operations, in alignment with the company's strategic direction. It applies to all information assets, business processes, employees, and technological infrastructure within ZEFI S.R.L. The policy provides the framework for establishing and reviewing information security objectives to protect the confidentiality, integrity, and availability of data, particularly customer data processed by the Zefi platform.

## Regulatory References

- ISO/IEC 27001:2022
- Applicable national and international laws and regulations concerning data protection and privacy.

## Terms and Definitions

- **Information security** : The preservation of confidentiality, integrity, and availability of information.
- **Confidentiality** : The property that information is not made available or disclosed to unauthorized individuals, entities, or processes.
- **Integrity** : The property of safeguarding the accuracy and completeness of information and assets.
- **Availability** : The property of being accessible and usable on demand by an authorized entity.
- **Nonconformity** : The non-fulfillment of a requirement.

## Roles and Responsibilities

- **Top Management** : Establishes and reviews this policy, ensures the protection of information assets, sets information security objectives, and demonstrates a commitment to fulfilling all applicable requirements and achieving continual improvement of the Information Security Management System (ISMS).

## Management System Commitment and Objectives

Zefi's Top Management establishes this Management System Policy as a declaration of its fundamental commitment to the security, quality, and continuity of its operations. This policy is appropriate to Zefi's purpose as an AI-powered platform for customer interaction analysis and supports its strategic direction. Top Management shall ensure this policy is reviewed annually, or upon significant changes to the organization's context, to maintain its suitability and effectiveness.

Top Management is committed to protecting the confidentiality, integrity, and availability of all information assets, with a particular focus on customer data processed by the Zefi platform. This commitment is central to building and maintaining the trust of clients, partners, and stakeholders. The principles guiding this policy are derived from a structured analysis of internal and external factors, as documented in the "Context analysis".

## Information Security Objectives

Top Management shall establish and maintain information security objectives that are consistent with the strategic goals of the organization. This policy provides the framework for setting these objectives.

- **Establishment** : Information security objectives shall be established at relevant functions and levels within the organization. They will be derived from the information security risk assessment process, as defined in the "PRO Risk management procedure", and will consider all applicable requirements.
- **Planning** : The achievement of these objectives shall be planned, documented, and monitored in accordance with the "PRO Objectives and planning for their achievement" procedure. Each objective will have a clear plan detailing resources, responsibilities, timelines, and evaluation metrics.
- **Measurement and Review** : The performance and effectiveness of the objectives shall be measured and monitored as described in the "PRO Measurement and monitoring procedure". Results shall be a key input for the periodic "PRO Management Review Process".

## Commitment to Fulfilling Requirements

Zefi is committed to identifying and fulfilling all applicable requirements related to its Management System. Top Management shall ensure that processes are in place to manage these obligations effectively. These requirements include:

- **Legal and Regulatory** : All mandatory laws and regulations applicable to ZEFI S.R.L.'s operations, products, and services, particularly concerning data protection and privacy for its European and international clients.
- **Contractual** : All binding obligations agreed upon with customers, suppliers, and partners.
- **Internal** : All policies, procedures, and controls defined within Zefi's Management System, including the "Code of conduct".

The assignment of specific duties for fulfilling these requirements is detailed in the "POL Information security roles and responsibilities policy".

## Commitment to Continual Improvement

Top Management is committed to the continual improvement of the Information Security Management System (ISMS) to enhance performance and adapt to evolving threats and opportunities. This commitment shall be demonstrated through:

- **Management Reviews** : Systematically reviewing the ISMS at planned intervals to ensure its ongoing suitability, adequacy, and effectiveness, as governed by the "PRO Management Review Process".
- **Audits and Assessments** : Planning and executing internal audits and risk assessments to verify compliance and identify areas for improvement, in line with the "PRO Internal audit management" and "PRO Risk management procedure".
- **Corrective Actions** : Identifying and addressing nonconformities, incidents, and weaknesses through a structured process defined in the "PRO Findings and events management procedure".

## Policy Communication and Availability

- **Documentation** : This policy shall be maintained as documented information and managed throughout its lifecycle according to the "PRO Documented information management procedure".
- **Internal Communication** : Top Management shall ensure this policy is communicated to and understood by all personnel and relevant contractors. This is achieved through initial onboarding, ongoing training, and awareness programs as detailed in the "PRO Human resources management procedure".
- **External Availability** : This policy shall be made available to relevant interested parties, such as clients, partners, and regulatory authorities, as deemed appropriate by Top Management, to provide assurance of Zefi's commitment to security and compliance.

## Archiving and Updates

This document shall be maintained as part of Zefi's documented information. It will be reviewed at least annually, or upon significant organizational or contextual changes, to ensure its continued suitability, adequacy, and effectiveness. Updates and historical versions are managed according to the "PRO Documented information management procedure".

## Reference Documents

- Context analysis
- PRO Risk management procedure
- PRO Objectives and planning for their achievement
- PRO Measurement and monitoring procedure
- PRO Management Review Process
- Code of conduct
- POL Information security roles and responsibilities policy
- PRO Internal audit management

- PRO Findings and events management procedure
- PRO Documented information management procedure
- PRO Human resources management procedure