1   General Objectives

BABEL underpins its professional services activity and that of its customers by means of Information Systems, a basic support of internal operations in both commercial and management functions. The systems, programs, communication infrastructures, files, databases and archives used to process information are BABEL's core asset, so their damage or loss impacts its performance and can jeopardise the organisation's continuity and the satisfaction of the customers who choose BABEL.

The Quality, Environmental, Information Security and Occupational Health and Safety Policy, hereinafter referred to as the CMSI SST(PRL) Policy, provides the basis for defining and delimiting the objectives and responsibilities for the various technical and organisational actions required to guarantee customer satisfaction, environmental culture, information security and occupational health, always in compliance with the applicable legal framework and the directives, specific policies and defined procedures.

The Management Systems Committee, together with departmental heads and the information assets, must define the requirements needed to meet security policy provisions, identifying and prioritising the importance of the different elements of the activity performed so that the most important processes receive the most protection.

It is the responsibility of BABEL management and of the committee to promote and support the implementation of measures to minimise the potential risks to which the organisation is exposed, always considering the business's strategic objectives and the outreach and compliance of this integrated Policy, and the supervision, implementation, development and maintenance of the integrated management system.

2 Statement of intent

BABEL management is cognizant of the importance of quality, the environment, information security and health and safety at work in the company's service portfolio and the way they can deliver an optimum degree of competitiveness in the current market. It has therefore developed this Integrated Policy CMSI-SST(PRL) along with the corresponding standards to secure optimum results in these areas.

Management has sought to define the most suitable processes for the organisation to embark on an improvement drive with the conviction that it will produce a more efficient production process. The ultimate aim of the entire system that has been defined and rolled out is to provide our customers with the best service, improving our processes and scrupulously respecting their legally established rights.

For all these reasons, BABEL management wishes to expressly state its knowledge and approval of the policies developed in this document, which all staff must know and assume as part of their work.

In order to make all this possible, the resources required for the proper development of the terms established herein will be assigned both at project outset and throughout future maintenance.

Madrid, 18th of February 2024.

3 Quality, Environment, Information Security and Health and Safety at work (OHS) Policy

BABEL is a Spanish company providing information and communication system and technology services. BABEL has been offering process consulting, computer technology, application development, technical support and graphic design services to its customers since the firm began in 2003.

Today BABEL is headquartered out of Madrid. You can consult the different delegations in the contact area of our web

Providing the highest quality services at the most competitive possible price, while establishing relationships of full trust and commitment with customers, is an essential part of the company's starting premise. Giving employees a place to successfully develop their careers is another core part of the BABEL spirit.

The fundamental values that BABEL owns and promotes are:

- ❑ Professionalism and efficiency. The company gives customers a professional and effective service and these are the same qualities its staff must provide and in which they must progress.

  The basis for delivering on BABEL commitments must be ongoing improvement in skills, procedures and tools, not volunteering or sustained overexertion.

- ❑ Initiative and proactivity. BABEL seeks and fosters initiative among staff so that everyone can bring innovative ideas and energy to the table, both in sales and project development and in the operation and organisation of the company itself.

  All BABEL employees are expected to demonstrate a permanent attitude of staying ahead of problem curves and an ability to not only perform the work assigned to them but identify and proactively take on tasks that clinch project success.

- ❑ Hands-off supervision structure. BABEL encourages the delegation of decision-making capacity to the people closest to the problem. This powers a hands-off hierarchical structure which ensures that most of the work carried out is productive.

  Maximising time billable to customers and minimising supervisory and administrative work is at the very heart of the BABEL business model.

- ❑ Total communication. Communications must flow smoothly both top-down and bottom-up so that each company member knows the purpose of their work and project, the strategy with their client and the company's progress at all times and can get their ideas, suggestions and complaints through to the appropriate parties.

- ❑ Ensure information confidentiality, integrity and availability. In keeping with the above, information exchange must be fluid and agile but always by means of secure and reliable channels to minimise possible leaks, in accordance with the nondisclosure clause all employees sign. Our suppliers, by contrast, only have access to the data they need to provide their services and always under BABEL supervision.

- ❑ Solidarity. BABEL is an open company and must be perceived as such by all employees. Staff have access to company ownership, with profit-sharing calculated on a global basis and not individually, by client or sector. There is no remuneration policy for personal business targets.

- ❑ <u>Individual performance appraisal</u>. Career progression depends on each person's effort and performance. All BABEL employees undergo an annual appraisal process which includes the opinions of line managers, colleagues and subordinates. The appraisal result determines the job category and pay for the following year, based on each employee's skills, efficiency and market value.

To secure maximum-quality service provisions, BABEL leverages an integrated quality, environment, information security and health and safety at work system certified UNE-EN ISO 9001:2015, UNE-EN ISO 14001:2015, ISO 45001:2018, ISO-IEC 27001:2013, and National Security Scheme (SNS), by which it undertakes to:

- ❑ Punch above customer expectations in service delivery, improving the generation of long-term relationships of trust and commitment.

- ❑ Deliver on customer requirements and the legal, regulatory and contractual provisions applicable in each case.

- ❑ Ensure confidentiality, integrity, availability, traceability and authenticity in processing customer information.

- ❑ Enhance and streamline BABEL's operational and management processes by analysing the results obtained, incorporating new work forms and methodologies and ensuring vocational training.

- ❑ Continually improve the effectiveness of the integrated system.

- ❑ Provide a reference framework for the establishment of the objectives of each of the systems.

- ❑ Comply with the applicable regulations in each of its areas and the relevant requirements of each management system.

- ❑ Identify and evaluate environmental impacts in order to implement measures to inform pollution prevention, leverage resource use and minimise waste generation.

- ❑ Manage waste appropriately to enable recycling where possible, prevent pollution and protect the environment.

- ❑ Implement controls and measures to protect assets against threats that could lead to security incidents.

- ❑ Assess the category of systems based on the 803 guidelines and criteria.

- ❑ Periodically evaluate the risks affecting assets, based on defined criteria, in order to manage them efficiently and adopt the appropriate measures/controls for them.

- ❑ Those responsible for each piece of information will be defined in the risk analysis where each asset is valued.

- ❑ Providing safe and healthy working conditions for our workers: Providing them with the necessary knowledge to be able to carry out their work in the right conditions.

- ❑ Informing and training workers on the risks inherent to their work and the measures to be adopted for their correct prevention, in order to enable the development of the prevention policy.

- ❑ To achieve a safe working environment by eliminating occupational hazards/risks and controlling and/or minimising risks that cannot be eliminated.

- ❑ Establish mechanisms for consultation and participation of workers and where workers' representatives are in place.

- ❑ Prevent work-related injuries and health impairment through actions that are appropriate to the purpose, size and context of BABEL and to the specific nature of the OSH risks and their OSH opportunities.

BABEL makes this integrated policy a reference framework to establish and review its strategic and security objectives, based on the following principles:

❑ Customer loyalty is a direct outcome of their satisfaction, achieved by proactively identifying their needs, delivering on their requirements, exceeding their expectations and doing it all at a competitive cost.

❑ BABEL's core asset is its human capital and the organisation's medium- and long-term survival rests on creating a highly qualified, motivated team that leverages innovation and is committed to the joint project that is BABEL. This is secured through a demanding selection process suitable to BABEL and by training employees in line with the needs defined in the strategic plan that will be managed, planned and delivered according to the training plan or on-demand, depending on whether it is a specific need (project or command) or a generic requirement (career plan).

❑ Make progress in the continuous improvement of occupational safety and health management as well as the prevention of harm and deterioration of health.

❑ As a company with proven expertise in the information systems field, BABEL knows the importance of security and information protection for good business performance, meeting targets and satisfying stakeholders. It therefore establishes an action framework to protect information and communications systems from deliberate and accidental internal and external threats to its three key pillars of confidentiality, integrity and availability.

❑ This securty is based on the principles of:

- Integral Security: Security will be understood as an integral process made up of all the technical, human, material and organizational elements related to the system. Maximum attention will be paid to the awareness of the people involved in the process and their hierarchical heads, so that neither ignorance, nor lack of organization and coordination, nor inadequate instructions, are sources of risk to safety.

- Risk Management: Risk analysis and management is an essential part of the security process and will be kept constantly updated, allowing to minimize risks to acceptable levels, by deploying security measures, which will establish a balance between the nature of the data and treatments, the risks to which they are exposed and the security measures.

- Prevention, reaction and recovery: BABEL has mechanisms to detect and prevent incidents and has the capacity to respond to them as quickly as possible.

- Lines of Defense: We have a protection strategy consisting of multiple layers of security and a department in charge of their maintenance.

- Periodic re-evaluation: Through internal and external audits.

- Differentiated function: There will be different roles within the Security System. It is documented in the SNS Policy.

❑ It is a priority for BABEL to make employees aware of the proper use of natural resources (mainly electricity) and correct waste segregation and treatment to minimise its environmental footprint and protect the environment.

❑ Ongoing organisational management improvement is achieved through effective action on quality and the environment and is the responsibility of the entire team that makes up the organisation.

BABEL is responsible for communicating and explaining the quality, environment, information security and health and safety at work policy to all personnel, both its own and temporarily outsourced, so they know and understand it. BABEL undertakes to ensure that the policy is always available to anyone outside the organisation who wishes to access it.

Failure by staff to comply with these obligations may result in disciplinary action and the company seeking legal recourse. The organisation can apply administrative sanctions in addition to those provided for by law. When conflicts of competence arise between the different people in charge, they will be resolved by the hierarchical superior

BABEL engages in the regular review of the quality, environment,information security and health and safety at work Policy for its correct adaptation over time and guarantees that, even if changes are made to it, the consistency of the implemented integrated quality, environment, information security and health and safety at work System will remain unaltered.

THE MANAGEMENT.