

COMMITMENT TO COMPLIANCE STATEMENT

1. Introduction

With this Statement Opiquad S.p.A. (hereinafter "Opiquad" or the "Company") formalises the Company's commitment to conducting its business in full compliance with applicable laws, the highest ethical standards and the integrity, security and transparency requirements. This Statement is addressed to vendors, customers, business partners, suppliers and anyone who has dealings with the Company.

2. Our commitment

Opiquad commits to:

2.1 Compliance with laws and business integrity

- comply with all laws and regulations applicable in every country where it operates, in Italy, in the European Union and in the United States;
- apply zero tolerance to any form of bribery or corruption, active or passive, involving public officials or private parties, consistent with the principles of Italian Legislative Decree 231/2001, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act;
- prevent and manage conflicts of interest of its personnel and representatives;
- compete fairly in compliance with antitrust law, refraining from anti-competitive agreements and bid rigging;
- comply with anti-money laundering, economic sanctions and export control regulations, screening counterparties and the destinations of products and services;
- keep accurate and complete books and records in accordance with applicable accounting standards, and provide vendors and customers with truthful information at every stage of the relationship.

2.2 Fair dealing with customers and vendors

- market its own and vendors' products and services truthfully and transparently, accurately representing features, prices, contractual terms and licensing conditions;
- comply with the rules of partner programmes and cloud solution provider programmes, including those on subscription management, acceptance of customer terms, use of incentives and marketing funds, and customer support;
- respect the intellectual property rights of vendors and third parties, never sell or activate software, licences or services outside authorised channels, and cooperate with licence compliance reviews;
- use vendors' trademarks, logos and materials only within the limits authorised.

2.3 Data protection and information security

- process personal data in accordance with Regulation (EU) 2016/679 (GDPR) and national legislation, with appropriate technical and organisational measures, and support customers in meeting their data protection obligations;
- maintain a certified Information Security Management System subject to independent audits, with cloud-specific controls;
- guarantee European digital sovereignty for data hosted on its infrastructure, transparency on processing locations and data portability;
- implement the requirements of the NIS2 Directive and the guidelines of the competent authorities on network and information system security;
- handle security incidents through formal procedures and promptly notify customers, vendors and authorities of data breaches as required by law.

2.4 People, human rights and the environment

- ensure decent, safe and non-discriminatory working conditions in compliance with labour law, the ILO fundamental Conventions and the UN Guiding Principles on Business and Human Rights; prohibit forced labour, child labour, harassment and discrimination;
- reduce the environmental impact of its activities through a certified Environmental Management System, energy-efficient data centres and its commitment to climate neutrality;
- promote a culture of integrity through regular staff training on compliance, security and data protection.

3. Certifications, qualifications and codes of conduct

Opiquad's commitment to compliance is verified by independent third-party bodies and evidenced by the following certifications, qualifications and memberships, maintained through periodic audits:

Area	Certification / Qualification	What it attests
Quality	ISO 9001:2015	Quality management system for the design, development and delivery of IT, cloud and connectivity services.
Information security	ISO/IEC 27001:2022 with ISO/IEC 27017 and ISO/IEC 27018 extensions	Information security management system, with specific controls for cloud services (27017) and for the protection of personal data in the cloud (27018).
Cloud security	CSA STAR Level 2	Cloud Security Alliance certification for IaaS and SaaS services, based on the Cloud Controls Matrix integrated with ISO/IEC 27001: over 190 controls verified across 17 security domains.
Data protection in the cloud	CISPE Code of Conduct and CISPE Sovereignty Label	Code of conduct approved under Art. 40 GDPR for cloud infrastructure providers, attesting GDPR compliance and transparency on data processing and location. Opiquad has been a member of CISPE (Cloud Infrastructure Services Providers in Europe) since 2022.
Digital sovereignty	Gaia-X Label Level 3	Highest level of conformity with the European Gaia-X framework: protection, transparency and immunity from non-European access to data.
Public sector	ACN Cloud Marketplace qualification (formerly AgID)	Eligibility of Opiquad's cloud services for procurement by Italian public administrations under the requirements of the National Cybersecurity Agency.
Environment	ISO 14001:2015	Environmental management system.
Energy efficiency	European Code of Conduct for Data Centres (Energy Efficiency)	Participation in the European Commission's voluntary code for reducing data centre energy consumption.
Climate neutrality	Climate Neutral Data Centre Pact	Signatory of the industry commitment to climate-neutral data centres by 2030.

4. Governance and controls

The commitment to compliance is supported by the following instruments adopted by the Board of Directors:

- Anti-Corruption Policy setting out rules of conduct, controls and sanctions for the prevention of corruption;
- certified management systems for quality, information security and the environment, with periodic management review and internal and external audits;
- a Compliance Officer, reporting to the Board of Directors, responsible for monitoring, training and handling reports;
- regular staff training and risk-based due diligence on business partners.

5. The same standard for partners and suppliers

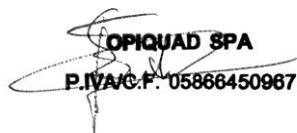
Opiquad requires its business partners, resellers, agents, subcontractors and suppliers to meet the same standard of integrity, legality, security and responsibility that it applies to itself. Partners and suppliers commit to:

- comply with applicable laws and with the principles of anti-corruption, fair competition, anti-money laundering and international trade compliance;
- protect human rights, working conditions, health and safety and the environment;
- protect personal data and confidential information with appropriate security measures and promptly report any incident;
- respect the intellectual property rights and licensing terms of Opiquad and its vendors;
- flow down the same obligations to their own supply chain and cooperate with verifications by Opiquad and its vendors.

Breach of these commitments constitutes a material default entitling Opiquad to suspend or terminate the contractual relationship and to exclude the partner or supplier from future business.

6. Signature

The Board of Directors of Opiquad S.p.A. confirms that the contents of this Statement reflect the policies, controls and certifications actually adopted by the Company as of the date of issue.



OPIQUAD SPA
P.IVA/C.F. 05866450967

The Board of Directors – Opiquad S.p.A.

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Società soggetta a direzione e coordinamento di **Opiquad Holding Srl**

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