



CORPORATE POLICY

The Management of MODO Network S.r.l. defines this Company Policy as a commitment to operational excellence, data protection, and the promotion of a fair and inclusive working environment, in compliance with **ISO 9001** and **ISO 27001** standards and **UNI/PdR 125:2022** guidelines.

We believe that inclusion, quality, and security are not merely declared values, but principles to be practiced every day through concrete actions and continuous training. We consider people to be our greatest asset: teamwork, cohesion, and diversity strengthen skills and enrich both solutions and customer approaches. Our commitment is an integral part of the company strategy, aligned with the values of integrity, passion, initiative, and essentiality.

1. Quality and Responsible Innovation (ISO 9001)

MODO Network is committed to ensuring the continuous improvement of processes and of the Company Management System through periodic assessments of business risks, enabling control and adaptation to managerial, environmental, business, and legal changes that may affect the company. In particular, our strategy evolves with a focus on:

- **Operational Excellence and the Value of Relationships:** We are committed to ensuring the full satisfaction of market needs and all interested parties, operating in strict compliance with applicable legal requirements and promoting the continuous growth of our team through training programs aimed at developing skills. We also strengthen valuable relationships with business partners and suppliers to ensure the highest quality standards for our customers.
- **Accessibility Act:** We are committed to designing and delivering accessible digital services that are partially compliant with accessibility technical specifications according to WCAG 2.1 Level AA parameters, with full compliance at WCAG 2.1 Level A and selective application of Level AA criteria based on a best-effort approach by MODO.
- **EU AI Act:** We adopt an ethical approach to the development and use of Artificial Intelligence, ensuring transparency, human oversight, and mitigation of discriminatory risks.

2. Information Security and Data Protection (ISO 27001)

We guarantee the protection of information from all threats, whether internal or external, intentional or accidental, in accordance with ISO/IEC 27001 and 27002 standards. Our pillars include:

- **Confidentiality, Integrity, and Availability:** Data is accessible only to authorized



individuals, its accuracy is ensured, and it is available whenever required.

- **GDPR Compliance:** We protect personal data in accordance with EU Regulation 679/16, integrating security into all phases of system design and development.
- **Access Management:** Every system access is subject to identification and authentication procedures differentiated according to role.
- **Vulnerability Management and Digital Awareness:** We ensure the effectiveness of our technological infrastructure through periodic vulnerability assessments and penetration tests, complemented by a continuous Cybersecurity training plan aimed at constantly improving awareness and skills across all personnel.

3. Diversity, Equity, Inclusion, and Gender Equality (UNI/PdR 125)

We promote a corporate culture based on respect and active listening, offering equal opportunities without discrimination. We adopt structured procedures to ensure:

- **Working Environment and Equal Opportunities:** We promote a culture based on respect, active listening, and inclusiveness, offering equal opportunities without discrimination based on gender, age, orientation, disability, or background. To counter unconscious bias, we ensure gender neutrality in recruitment, equal participation in training, fair access to career opportunities, and objective performance evaluations based on results. Aware of the risks of unconscious bias and stereotypes, we adopt structured procedures to guarantee equality and inclusion throughout every stage of the human resources lifecycle.
- **Pay Equity and Work-Life Balance:** We periodically monitor the gender pay gap to ensure fairness between equivalent roles. We support work-life balance and a culture of shared parenting, recognizing family responsibilities as a source of value and ensuring parental leave accessible to all.
- **Training, Communication, and Awareness Culture:** DEI training is an integral part of the annual development plan. We are committed to using inclusive and accessible language, avoiding gender stereotypes, valuing the contribution of minorities, and preventing all forms of harassment or abuse.
- **Value-Based Collaborations:** We select partners and suppliers based on their alignment with our values, encouraging them to adopt similar principles of inclusion and respect within their own working environments.

4. Regulatory Framework and International Commitments

MODO NETWORK is committed to complying with the following references, which form the foundation of our activities:



Scope	Legislative References and Standards
Management systems	ISO 9001, ISO/IEC 27001, UNI/PdR 125:2022
Data and technology	GDPR (Reg. UE 679/16), European Accessibility Act, EU AI Act
Human rights and labor	Agenda 2030 ONU (Goal 5); Global Compact and Women's UN Empowerment Principles; Universal Declaration of Human Rights; ILO Conventions on violence and harassment (June 2019); National Gender Equality Strategy 2021–2025; EU Gender Equality Strategy; United Nations conventions on women's rights, elimination of racial discrimination, children's rights, and rights of persons with disabilities;

6. Governance and Reporting Channels

Management assumes direct responsibility for implementing this policy by ensuring the necessary resources, appointing the Company Management System Manager (RSGA) and the Gender Equality Management System Manager (RSPG), and establishing a Steering Committee balanced by gender and functions, as well as dedicated confidential reporting channels. These measures ensure that all individuals can safely report, without fear of retaliation, any situation that is not aligned with the principles expressed herein.

This policy is subject to review at least annually or whenever significant organizational, regulatory, or contextual changes occur.

Management
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