

Ghella | Global

Information Security Policy

Information Security is a priority for us, since we are committed to protecting information from all forms of threat - internal or external, deliberate or accidental.

We adopt a structured and effective Information Security Management System based on a risk-driven approach and focused on the continuous improvement of performance in proactive management of risks.

This Policy represents the formal commitment of Company Management to operate in accordance with an Information Security Management System compliant with the requirements of ISO/IEC 27001:2022.

Our commitment to Information Security is demonstrated through clear and concrete action:

- ensuring that Information Security objectives are established in alignment with the Organisation's strategy;
- integrating the requirements of the Information Security Management System into the company's processes;
- ensuring the availability of the resources required to implement, maintain and continually improve the Information Security Management System;
- communicating and promoting, at all organisational levels, the importance of effective Information Security management and compliance with system requirements;
- ensuring that the Information Security Management System achieves its intended outcomes;
- guiding and supporting personnel so they can actively contribute to the effectiveness of the Information Security Management System;
- promoting continuous improvement of the Management System;
- supporting relevant management roles in demonstrating leadership in Information Security.

In line with these commitments, we have set the following general objectives:

- ensuring full compliance with legal, contractual, and local requirements at all times;
- ensuring the highest level of protection for information, including personally identifiable information (PII), safeguarding its confidentiality, integrity, and availability;
- ensuring the operational continuity of our core business, and minimising the occurrence of Information Security incidents;
- strengthening staff awareness and competence on Information Security matters;
- enhancing client satisfaction and loyalty by presenting ourselves as a reliable, competent partner that complies fully with applicable Information Security regulations.

This Policy applies to all Ghella operations worldwide; we therefore expect all our partners, suppliers, and subcontractors to fully comply with and support the principles set out herein.

We implement our Corporate Sustainability Plan by working towards measurable objectives whose coherence, transparency, and progress are monitored and guaranteed by our corporate governance structure.

Reports may be submitted through the channels specified in the Whistleblowing Policy and will be managed in accordance with that Policy.

The Policy is communicated to every new Ghella employee as part of the onboarding process and is available on the company intranet and our institutional website.

The Information Security Policy is reviewed annually during the Management System Review to ensure that it remains continuously aligned with Ghella's mission and vision.


Enrico Ghella

President and Chief Executive Officer, November 2025