

INFORMATION SECURITY POLICY

CONTENTS

1. PURPOSE
2. DESCRIPTION
3. SCOPE OF APPLICATION
4. INFORMATION SECURITY POLICY
5. INFORMATION SECURITY POLICY RESPONSIBILITIES

PM Oil&Steel S.p.A a socio unico.
Soggetta a direzione e coordinamento
da parte di Manitex International Inc.

C.F./P.IVA 03520360961 Cap. Soc. i.v. 10.000.000.00€
Registro imprese di Modena R.E.A. n° 334223



1. PURPOSE

The purpose of this document is to outline the general principles of information security laid down by PM OIL&STEEL S.p.A. so as to implement an efficient and secure Information Security Management System.

2. DESCRIPTION

PM OIL&STEEL S.p.A. believes that the primary goal of information security is to protect data and information, along with the technological, physical, logical and organisational structure, so as to protect assets such as corporate know-how and the know-how of its Customers and Suppliers, as well as the natural persons whose common, judicial and sensitive data are processed.

The Information Security Policy defines and sets out the confidentiality of information and computer system integrity. It also manages all aspects related to it, including technical, management and business-related aspects, as well as data confidentiality and availability. The Information Security Policy is made up of a number of activities that include identifying critical issues, managing risks, systems and the network, as well as vulnerabilities and incidents, access control, privacy and compliance management, damage assessment, and any other aspect that may affect information security management.

This involves implementing and maintaining an information security management system in accordance with the following principles:

- a. Confidentiality: guaranteeing that information will only be accessed by authorised persons and/or in accordance with authorised procedures;
- b. Integrity: ensuring the consistency of information, with no unauthorised changes;
- c. Availability: guaranteeing that authorised users will have access to information and related IT infrastructure elements upon request;
- d. Control: guaranteeing that data are always managed using secure, tried and tested protocols and tools;
- e. Authenticity: continuous monitoring of information quality;
- f. Privacy: ensuring that common, judicial and sensitive data are protected and controlled.

Implementing an Information Security Management System guarantees:

- A strong corporate image
- Business continuity
- Customer satisfaction
- Compliance with applicable regulations and international security standards

This is why PM OIL&STEEL S.p.A. has developed an Information Security Management System in accordance with mandatory laws so that it can manage information security as part of its business activities.

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3. SCOPE OF APPLICATION

The Information Security Policy of PM OIL&STEEL S.p.A. applies to all personnel employed either by the company or third parties who are involved in information management and in all processes and resources involved in the design, implementation, start-up and delivery of the products and services.

4. INFORMATION SECURITY POLICY

The Information Security Policy of PM OIL&STEEL S.p.A. reflects the company's commitment towards its Customers and Third Parties to ensuring information security, as well as the security of the physical, logical and organisational tools used to process such information during all activities.

The Information Security Policy of PM OIL&STEEL S.p.A. is guided by the following principles:

- a. Ensuring that the company is fully aware of the information it manages and that critical issues are identified so that adequate protection can be more easily guaranteed.
- b. Ensuring security as a key element of networks, information systems, operations and access to information so as to prevent unauthorised processing or processing carried out without the required authorisation.
- c. Ensuring that the company and Third Parties will work together to process the information by implementing procedures aimed at maintaining adequate security.
- d. Ensuring that the company and any Third Parties involved in processing the information are aware of the fact that information security is essential.
- e. Ensuring that any anomalies and incidents, which may affect the company's information system and security levels, are detected promptly and handled properly by implementing efficient prevention, communication and response systems in order to minimise their impact on business operations.
- f. Ensuring that the company's headquarters and facilities are only accessed by authorised personnel, so as to keep the premises and assets secure.
- g. Ensuring compliance with legal requirements and the fulfilment of security obligations set out in contracts with Third Parties.
- h. Ensuring that information system anomalies, incidents and vulnerabilities are detected so as to maintain data and information security and availability.
- i. Ensuring corporate business continuity and disaster recovery by applying established security procedures.
- j. Ensuring that common, judicial and sensitive data, whether PM OIL&STEEL S.p.A. is acting as the Data Controller or as the Data Processor on behalf of third parties, is processed in compliance with the EU General Data Protection Regulation (GDPR) No. 679/2016.
- k. Ensuring that all employees, suppliers and Third Parties understand their role and the impact that their actions may have on information security.
- l. Ensuring that each Resource is properly trained, briefed and instructed with regard to information security management policies and procedures.

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The Information Security Policy of PM OIL&STEEL S.p.A. is constantly updated and checked to make sure that it is continuously improved, and is shared with the company, Third Parties and Customers by publishing it on the website.

5. INFORMATION SECURITY POLICY RESPONSIBILITIES

The Management is in charge of the Information Security Management System, in line with the company's evolving needs and market demand, and decides whether any action needs to be taken when faced with events such as:

- Major business developments;
- New threats other than those taken into account in risk analysis activities;
- Serious security incidents;
- Developments in the regulatory or legislative framework with regard to secure information processing.

San Cesario sul Panaro (Modena)
02/01/2023

The Management
Giovanni Tacconi

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