

IT System Policy

Our approach to Information Technology (IT)

The F.I.L.A. Group is one of the leading global enterprises devoted to the research, design, manufacture, and sale of tools for creative expression. The Group designs, makes and packages tools and supports for drawing, colouring and painting, modelling, for use by children, youths and adults. Our product range includes more than 25 well-known brands and thousands of products sold on all continents.

We are engaged to a responsible behavior towards all our relevant stakeholders in operating business, combining respect of people, natural environment, and communities, and sustainability is therefore embedded with our Purpose, Vision, Mission, Values set out in our Ethics Code, and day-to-day operations.

This policy, together with our Ethics Code and the Corporate Governance Model, should be adopted by all Group companies and form part of the Group Organization, Management and Control Model, in accordance with the principles and objectives of the Organization, Management and Control Model as per Italian Legislative Decree 231/2001.

The Information Technology (IT) System (including technological resources - hardware, software, data, electronic documents, telematic networks - and human resources dedicated to their administration, management and use) represents a tool of primary importance for the achievement of the strategic and operational objectives of the F.I.L.A. Group in consideration of the criticality of the business processes that depend on it.

This Policy concerns the management and use of the information system in all its aspects.

To pursue our business objectives, information must meet certain requirements:

- **Confidentiality:** the information must be known only by those who have the relative right, respecting the principle of the least privilege ("need to know") based on the duties covered ("need to operate")
- **Integrity:** information must be accurate and complete, must respect company values and expectations, and must be protected from unauthorized changes and deletions. To meet this requirement, the information must be accurate, up-to-date and legible
- **Security:** the information must be maintained and kept secure from any possible external threat, either perpetrated physically (direct access to places or technologies where the information is stored and managed) or logically (Cyber Attacks of any kind), implementing the proper hardware infrastructure, configuration and software solutions able to provide proper and up-to date, state of the art, countermeasures.
- **Availability:** information must be available when required by company processes, in an efficient and effective manner
- **Effectiveness:** the information must be relevant and relevant to the business process and, at the same time, must be available promptly, without errors and provided in a way that can be used by the user
- **Efficiency:** information must be provided through the optimal use of resources both from the point of view of productivity and economy
- **Reliability:** the information must be appropriate, in order to allow top management to manage the company and ensure the correct decision making; in the same way, the information provided to the heads of the various Group companies and head of functions must allow them to carry out their functions, the obligations to produce the financial statements and all the reports and reports required by internal and external regulations.
- **Sinergy:** the information must be organized and provided to give a complete and cross-company picture of the business to Group Level Management. This must be gained through implementation of Management Systems with a Group Level scope and approach, wherever applicable. The same way, Group Level Management Systems must be maintained and developed ensuring the stability and reliability of information considering all inter- and cross-company interactions.

The management of the Group Information System is carried out by qualified personnel who, thanks to their experience, ability and reliability, provide a guarantee of full compliance with internal provisions and external regulations on the subject.

In order to manage the Information System adequately, an effective monitoring process is essential to facilitate the prompt identification and correction of any shortcomings relating to policies, processes and procedures. This can considerably reduce the frequency and / or severity of harmful events.

We direct our activities to comply with current legislation, with particular reference to applicable Codes regarding the protection of personal data in all the countries where we operate, not only in order to avoid the risk of company involvement, but above all to guarantee an adequate level of security of personal data of the Group and its information system.

We are committed to maintaining the highest possible ethical standards and to complying with all applicable laws in all countries in which we do business. We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

Scope of this Policy

This Policy applies to F.I.L.A. S.p.A., its subsidiaries, the entities in which it holds a majority interest, and the facilities that it manages. We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

Locally each company should adopt more stringent rules and procedures, as needed and in accordance with local laws and regulations. While conducting its management, coordination and supervision activities, F.I.L.A. S.p.A. respects management autonomy of each affiliate within its Group, managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the Values that permeate our actions, by promoting them in the communities where we operate. The purpose of this Policy is to provide guidance to F.I.L.A.'s directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives to ensure compliance with applicable regulation and our Values and Policies.

The F.I.L.A. Group is committed to a continuous improvement of its policies and its programs, facilitating the adoption at local level of all procedures, rules, and instructions needed to have the principles set in this Policy applicable and monitored, in order to make an impact. By adopting this Policy, we believe to contribute to a better condition of existing and of next generations, providing tools for a better quality of life.

General principles

In our strategies and operations, we activate internal organizational units that ensure the execution of processes aimed at:

- ensure users training and access to functions according to security criteria adhering to principles of sound and prudent management or in any case to Group IT Security Policy
- activate processes aimed at enhancing IT resources, intended as a lever for achieving the Group's objectives
- create a communication system of the needs or criticalities of the Information System with the aim of activating a process of continuous improvement
- implement controls aimed at assessing the company's ability to comply with internal policies
- promptly identify deviations (anomalies, malfunctions, differences with respect to what is known / approved / authorized)
- promote corrective actions.

F.I.L.A.'s Top Management has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with F.I.L.A. and the consistency of their behavior with the values embodied in this Policy.

This Policy is communicated within the organization and made available online to all stakeholders on the web site www.filagroup.it.

F.I.L.A. encourages anyone who becomes aware of facts or behaviors contrary to the Company's Code of Ethics, policies and internal rules, laws or regulations, to make a report in the utmost confidentiality. Assuring confidentiality of the whistleblower's identity, F.I.L.A. offers the following channels to file a report:



- E-mail: whistleblowing.fila@gmail.com
- Mail to: odv@fila.it Organismo di Vigilanza, F.I.L.A. Fabbrica Italiana Lapis ed Affini S.p.A. Via XXV Aprile, 5 20016 Pero (MI).

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GROUP CEO – Massimo Candela