

1 General Objectives

BABEL underpins its professional services activity and that of its customers by means of Information Systems, a basic support of internal operations in both commercial and management functions. The systems, programs, communication infrastructures, files, databases and archives used to process information are BABEL's core asset, so their damage or loss impacts its performance and can jeopardise the organisation's continuity and the satisfaction of the customers who choose BABEL.

The Quality, Environment and Information Security Policy lays the groundwork for defining and delimiting the objectives and responsibilities of the various technical and organisational actions required to secure customer satisfaction, the environmental culture and information security, complying at all times with the applicable legal framework and with directives, specific policies and defined procedures.

The Management Systems Committee, together with departmental heads and the information assets, must define the requirements needed to meet security policy provisions, identifying and prioritising the importance of the different elements of the activity performed so that the most important processes receive the most protection.

It is the responsibility of BABEL management and of the committee to promote and support the implementation of measures to minimise the potential risks to which the organisation is exposed, always considering the business's strategic objectives and the outreach and compliance of this Quality, Environment and Information Security Policy, and the supervision, implementation, development and maintenance of the integrated management system.

2 Statement of intent

BABEL management is cognizant of the importance of quality, the environment and information security in the company's service portfolio and the way they can deliver an optimum degree of competitiveness in the current market. It has therefore developed this Quality, Environment and Information Security Policy along with the corresponding standards to secure optimum results in these areas.

Management has sought to define the most suitable processes for the organisation to embark on an improvement drive with the conviction that it will produce a more efficient production process. The ultimate aim of the entire system that has been defined and rolled out is to provide our customers with the best service, improving our processes and scrupulously respecting their legally established rights.

For all these reasons, BABEL management wishes to expressly state its knowledge and approval of the policies developed in this document, which all staff must know and assume as part of their work.

In order to make all this possible, the resources required for the proper development of the terms established herein will be assigned both at project outset and throughout future maintenance.

Madrid, 26 February 2020.

3 Quality, Environment and Information Security Policy

BABEL is a Spanish company providing information and communication system and technology services. BABEL has been offering process consulting, computer technology, application development, technical support and graphic design services to its customers since the firm began in 2003.

Today BABEL is headquartered out of Madrid. You can consult the different delegations in the contact area of our web www.babel.es.

Providing the highest quality services at the most competitive possible price, while establishing relationships of full trust and commitment with customers, is an essential part of the company's starting premise. Giving employees a place to successfully develop their careers is another core part of the BABEL spirit.

The fundamental values that BABEL owns and promotes are:

- ❑ Professionalism and efficiency. The company gives customers a professional and effective service and these are the same qualities its staff must provide and in which they must progress.
The basis for delivering on BABEL commitments must be ongoing improvement in skills, procedures and tools, not volunteering or sustained overexertion.
- ❑ Initiative and proactivity. BABEL seeks and fosters initiative among staff so that everyone can bring innovative ideas and energy to the table, both in sales and project development and in the operation and organisation of the company itself.
All BABEL employees are expected to demonstrate a permanent attitude of staying ahead of problem curves and an ability to not only perform the work assigned to them but identify and proactively take on tasks that clinch project success.
- ❑ Hands-off supervision structure. BABEL encourages the delegation of decision-making capacity to the people closest to the problem. This powers a hands-off hierarchical structure which ensures that most of the work carried out is productive.
Maximising time billable to customers and minimising supervisory and administrative work is at the very heart of the BABEL business model.
- ❑ Total communication. Communications must flow smoothly both top-down and bottom-up so that each company member knows the purpose of their work and project, the strategy with their client and the company's progress at all times and can get their ideas, suggestions and complaints through to the appropriate parties.
- ❑ Ensure information confidentiality, integrity and availability. In keeping with the above, information exchange must be fluid and agile but always by means of secure and reliable channels to minimise possible leaks, in accordance with the nondisclosure clause all employees sign. Our suppliers, by contrast, only have access to the data they need to provide their services and always under BABEL supervision.
- ❑ Solidarity. BABEL is an open company and must be perceived as such by all employees. Staff have access to company ownership, with profit-sharing calculated on a global basis and not individually, by client or sector. There is no remuneration policy for personal business targets.

- ❑ Individual performance appraisal. Career progression depends on each person's effort and performance. All BABEL employees undergo an annual appraisal process which includes the opinions of line managers, colleagues and subordinates. The appraisal result determines the job category and pay for the following year, based on each employee's skills, efficiency and market value.

To secure maximum-quality service provisions, BABEL leverages an integrated quality, environment and information security system certified UNE-EN ISO 9001:2015, UNE-EN ISO 14001:2015 and ISO-IEC 27001:2013, by which it undertakes to:

- ❑ Punch above customer expectations in service delivery, improving the generation of long-term relationships of trust and commitment.
- ❑ Deliver on customer requirements and the legal, regulatory and contractual provisions applicable in each case.
- ❑ Ensure confidentiality, integrity and availability in processing customer information.
- ❑ Enhance and streamline BABEL's operational and management processes by analysing the results obtained, incorporating new work forms and methodologies and ensuring vocational training.
- ❑ Continually improve the effectiveness of the integrated quality, environment and information security management system implemented at the company.
- ❑ Comply with applicable environmental regulations.
- ❑ Identify and evaluate environmental impacts in order to implement measures to inform pollution prevention, leverage resource use and minimise waste generation.
- ❑ Manage waste appropriately to enable recycling where possible, prevent pollution and protect the environment.
- ❑ Implement controls and measures to protect assets against threats that could lead to security incidents.
- ❑ Periodically evaluate the risks affecting assets, based on defined criteria, to manage them efficiently and adopt appropriate measures and controls.

BABEL makes this quality, environment and information security policy a reference framework to establish and review its strategic and security objectives, based on the following principles:

- ❑ Customer loyalty is a direct outcome of their satisfaction, achieved by proactively identifying their needs, delivering on their requirements, exceeding their expectations and doing it all at a competitive cost.
- ❑ BABEL's core asset is its human capital and the organisation's medium- and long-term survival rests on creating a highly qualified, motivated team that leverages innovation and is committed to the joint project that is BABEL. This is secured through a demanding selection process suitable to BABEL and by training employees in line with the needs defined in the strategic plan that will be managed, planned and delivered according to the training plan or on-demand, depending on whether it is a specific need (project or command) or a generic requirement (career plan).
- ❑ As a company with proven expertise in the information systems field, BABEL knows the importance of security and information protection for good business performance, meeting targets and satisfying stakeholders. It therefore establishes an action framework to protect information and communications systems from deliberate and accidental internal and external threats to its three key pillars of confidentiality, integrity and availability.
- ❑ It is a priority for BABEL to make employees aware of the proper use of natural resources (mainly electricity) and correct waste segregation and treatment to minimise its environmental footprint and protect the environment.

- Ongoing organisational management improvement is achieved through effective action on quality and the environment and is the responsibility of the entire team that makes up the organisation.

BABEL is responsible for communicating and explaining the quality, environment and information security policy to all personnel, both its own and temporarily outsourced, so they know and understand it. BABEL undertakes to ensure that the policy is always available to anyone outside the organisation who wishes to access it.

Failure by staff to comply with these obligations may result in disciplinary action and the company seeking legal recourse. The organisation can apply administrative sanctions in addition to those provided for by law.

BABEL engages in the regular review of the quality, environment and information security policy for its correct adaptation over time and guarantees that, even if changes are made to it, the consistency of the implemented integrated quality, environment and information security system will remain unaltered.

THE MANAGEMENT.